



**RECORD**  
**of processing activity**  
**according to Article 31 Regulation 2018/1725**

**NAME of data processing:**

Pulse Survey Assessment for F4E Management.

**Last update: July 2020**

1) Controller(s) of data processing operation (Article 31.1(a))

- Controller: Organisational entity of Fusion for Energy (F4E)
  - Unit / Department **responsible** for the processing activity: Human Resources Unit
  - Contact: [HR-DataProtection@f4e.europa.eu](mailto:HR-DataProtection@f4e.europa.eu)
- Data Protection Officer (DPO): [DataProtectionOfficer@f4e.europa.eu](mailto:DataProtectionOfficer@f4e.europa.eu)

2) Who is actually conducting the processing? (Article 31.1(a))

The data is processed by F4E (responsible unit) itself:

The data is processed by a third party (e.g. contractor) (Art. 29 – Processor) :

Contact point at external third party (e.g. Privacy/Data Protection Officer):

F4E is contracting the Pulse Survey Assessment with the Greenhouse Group (hereinafter 'the Processor'), through a service contract between F4E and The Greenhouse Group (F4E\_D\_2HTW4B).

Contact point of Greenhouse group:

[info@greenhouse-group.com](mailto:info@greenhouse-group.com)

The Greenhouse Group is processing the Pulse Survey assessment through a sub-contractor (hereafter the Sub-Processor), the Leadership Circle LLC, with which F4E has not direct contract. Contact point for the Leadership Circle LLC:

[project-center@theleadershipcircle.com](mailto:project-center@theleadershipcircle.com)

### 3) Purpose and Description of the processing (Article 31.1(b))

*Why is the personal data being processed? Specify the underlying reason for the processing and what you intend to achieve. Describe, summarise the substance of the processing.*

*When you (later on) intend to further process the data for another purpose, please inform the Data Subject in advance.*

As a complement to the 360° exercise that is proposed by F4E, managers may also have the option to track their development goals and associated behaviors over a certain time, through mini-assessments. This process is called 'Pulse Survey Assessment'.

It is to be noted that the term 'manager' is used here in a broad meaning and may include staff members who have team coordination responsibilities without belonging necessarily to the category of middle management as defined in the Staff Regulations.

#### Description of the process:

The Pulse Survey Assessment consists of three assessments on one main development goal chosen by the manager (hereinafter 'the assessee') and conducted over an 8-month period:

- a baseline pulse survey, which serves a reference;
- a first pulse survey,
- a follow-up pulse survey.

These surveys are sent to 5 to 8 coworkers selected by the assessee. These contributors assess the assessee's current levels of performance in the goal area and on specific positive and negative behaviors associated with that goal. Contributors may also offer relevant comments about the assessee's pursuit of the goal and related behaviors.

After the baseline and first pulse surveys, results are included in a brief summary report sent to the assessee. The assessee can use this to chart his/her progress and determine which areas are in need of further development. All comments made by the contributors in the pulse surveys will remain exactly as written by the respondent in their feedback and no modifications to these comments will be made in the summary reports sent to the assessee.

The follow-up pulse survey is sent to the contributors to gauge the assessee's success in changing overall leadership performance. This modified pulse survey includes all items from the previous pulses, as well as five additional items from the The Leadership Circle Profile in general (the 360° questionnaire used by F4E) that reflect overall leadership effectiveness. Included in the follow-up pulse survey are two open-ended items designed to gather feedback on the leader's greatest leadership strength and challenge.

At the end of the process, a comprehensive summary report is then generated to highlight the final levels of performance, changes in performance over the past 3 to 4 months, and comparisons of current leadership effectiveness to baseline measures of leadership effectiveness. The map of progress is charted through time series tracking across assessments and summarizations of leadership strengths and challenges.

Participation in this exercise by the managers and the contributors is entirely voluntary and no negative consequences derive from either participating or not participating. In particular, it is **independent from the 360° assessment exercise** and participation to one exercise does not entail necessary participation to the other.

Furthermore, managers may revoke their consent and consequently stop the exercise at any time of the process, which will lead to no negative consequences whatsoever. Managers who want to take part in the Pulse Survey Assessment sign a specific consent form ([F4E\\_D\\_2MMWVC](#)). The consent regarding the Pulse Survey Assessment is without prejudice to future exercises, for which the consent will be requested again.

The external provider receives from F4E the list of managers participating to the Pulse Survey Assessment, who have beforehand provided the consent form duly completed. The external provider then sends an electronic link to the assessee, so that they can connect to the Pulse Survey Assessment. The assessee uploads the information concerning the contributors (full name, email addresses), who then receive an electronic link to complete the Pulse Survey Assessment. Once the external provider receives the surveys completed, it conducts the analysis and prepares the reports to the attention of the assessee.

#### 4) Lawfulness of the processing (Article 5(a)–(d)):

*Mention the legal bases which justifies the processing*

Processing necessary for:

- (a) performance of tasks in the public interest attributed by EU legislation (including management and functioning of F4E):
- [Council Decision of 27 March 2007 “establishing the European Joint Undertaking for ITER and the Development of Fusion Energy and conferring advantages upon it” - 2007/198/Euratom, as last amended by Council Decision of 22 February 2021 \(2021/281 Euratom\), O.J. L 62, 23.02.2021, p.8, in particular Article 6 thereof;](#)
  
  - [Statutes annexed to the Council Decision \(Euratom\) No 198/2007 “establishing the European Joint Undertaking for ITER and the Development of Fusion Energy and conferring advantages upon it”, as last amended on 22 February 2021, in particular Article 10 thereof;](#)
  
  - [Staff Regulations of Officials \(SR\) and the Conditions of Employment of Other Servants of the European Communities \(CEOS\), notably Article 24 on professional development;](#)
- (b) F4E Integrated Management System Standards ([F4E Integrated Management System Standards \(F4E D 24LQJM\)](#)) compliance with a *specific* legal obligation for F4E to process personal data....
- (c) necessary for the performance of a contract with the data subject or to prepare such a contract.....
- (d) Data subject has given consent (ex ante, freely given, specific, informed and unambiguous consent) .....

A [consent form](#) is signed by each participating manager before the start of the exercise. The form is then stored in the HR share drive electronically:

- Consent to take part in this exercise

## 5) Description of the data subjects (Article 31.1(c))

*Whose personal data is being processed?*

The different categories of persons potentially affected by the processing of personal data within the Pulse Survey assessment are:

- Assessee
- Contributors: those coworkers chosen by the manager to assess him/her in the framework of the Pulse Survey assessment.

6) Categories of personal data processed (Article 31.1(c))

*Please give details in relation to (a) and (b). In case data categories differ between different categories of data subjects, please explain as well.*

**a) General personal data:**

- full name, position, e- mail address, language and gender of the assessee;
- full name, gender, e-mail address of the contributors;

**In the consent Forms:**

Name, surname, date, signature, consent to take part in the exercise on a voluntary basis, individual summary survey reports.

**In the summary surveys reports:**

- assessment (including over time) by the contributors of the manager's levels of performance in the goal area and on specific positive and negative behaviors associated with that goal;
- opinions of the contributors about the manager's pursuit of the goal and related behaviors, with quantitative and qualitative questions-assessment of the assessee against one management goal chosen by the assessee, produced by the contributors.

**b) Sensitive data (Article 10)**

Processing of sensitive data is not foreseen or expected. However, it is not excluded that a contributor in the exercise introduces sensitive data in his/her qualitative comments.

7) Recipient(s) of the data (Article 31.1 (d)) – Who has access to the personal data?

*Recipients are all people to whom the personal data is disclosed ("need to know principle"). Not necessary to mention entities that may have access in the course of a particular investigation (e.g. OLAF, Court, EDPS).*

The exercise involves two processors in addition to F4E:

- F4E contractor: Greenhouse
- Sub-contractor of Greenhouse: the Leadership Circle LLC.

Leadership Circle LLC **collects the pulse surveys** on the managers who participate in the exercise through its own assessment tool (the Pulse Survey Assessment) and produce the individual summary reports.

**Consent forms:**

**External Processor:**

The Greenhouse Group (including Greenhouse Group coach in charge of administering the Pulse survey assessment for F4E), in line with their privacy notice.

**F4E recipients:**

- Director of F4E
- Process Owner: Head of HR Unit
- HR responsible officers for implementing the exercise

**Questionnaires:**

**External Processor:**

- **Emails** are collected to retain privacy so that only the email contact can access their surveys.
- **Names** are optional, and are not verified by the external processors. They are collected so that the reports can be labeled with the persons' correct name, and reports can be clearly identified as to whom they belong to. They are not used for any other purpose.

Both Leadership Circle LLC and Greenhouse Group have access to the data contained in the questionnaires completed by the managers concerned and by the contributors. The data in the questionnaires have no reference to the identity of the contributors. Contributors **ignore the identity** and the contents of the contributions made by others.

**Pulse survey assessment reports:**

**External Processor:**

- Leadership Circle LLC, in line with their privacy notice;
- The Greenhouse Group (including Greenhouse Group coach in charge of administering the 360° assessment for F4E), in line with their privacy notice;
- External Coach in case the assessee decides that s/he voluntarily wants to share the data with him/her for professional development purpose.

**F4E recipients:**

- Assessee: the manager who was assessed receives his/her own reports prepared by the external provider.

**Finally, and irrespective of the type of documents, the following recipients have access to the personal data processed:**

- IDM Manager, if necessary for support,
- ICT Officer responsible for the dedicated database, if necessary for technical support.
- Also, if appropriate and necessary for monitoring or inspection tasks, access may be given to: Head of Administration Department, DPO and Anti-Fraud & Ethics Officer, Head and/ or responsible officer of LSU, IAC, IDOC

**8) Transfers to third countries or International Organizations (Article 31.1 (e))**

*If the personal data is transferred outside the EU, this needs to be specifically mentioned, since it increases the risks of the processing operation (Article 47 ff.).*

Data is transferred to third countries or International Organizations recipients:

Yes.....

No .....

If yes, specify to which country/IO:

If yes, specify under which safeguards and add reference :

- Adequacy Decision (from the Commission).....
- Memorandum of Understanding between public authorities/bodies.....
- Standard Data Protection Clauses (from the EDPS/Commission).....
- Binding Corporate Rules.....
- Others, e.g. contractual/agreements (subject to authorisation by the EDPS).....

Reference: Not applicable.

9) Technical and organisational security measures (Articles 31.1(g) and 33)

*Please specify where the data is stored (paperwise and/or electronically) during and after the processing. Specify how it is protected ensuring “confidentiality, integrity and availability”. State in particular the “level of security ensured, appropriate to the risk”.*

Security measures are implemented to ensure integrity, confidentiality and availability of information. The default provisions include backups, centralized logging, software updates and continuous vulnerability assessment and follow-up. Specific provisions resulting from the characteristics of the information system may lead into the implementation of encryption, two factor authentication among others found relevant following a risk analysis.

10) Retention time (Article 4(e))

*How long is it necessary to retain the data and what is the justification for this retention period? If appropriate, differentiate between the categories of personal data. If the retention period is unknown, please indicate the criteria for determining it.*

Consent forms are retained by F4E for a period of two years following completion of the exercise provided there are no pending claims.

The exercise is considered completed when all pulse survey assessment reports are delivered. F4E will contact the external provider after a period of 2 years following the completion of the exercise to request the deletion of the data from their server unless F4E continues utilising the services of the same provider. In any case, the data shall be deleted by the external provider after a maximum of 5 years following completion of the exercise.

Fusion for Energy may continue to store Personal Data for a longer period, as may be



until such claims are finally resolved.

The data maybe kept for financial management purposes and the related retention periods are established in the dedicated [contract management record](#).

#### 11) Information/Transparency (Article 14-15)

*Information shall be given in a concise, transparent and easily accessible form, using clear and plain language.*

A Privacy Notice (F4E\_D\_2MPSJB) is published in the F4E intranet, providing staff members with the information required under Regulation 2018/1725 of 23 October 2018 “on the protection of individuals with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data”. O.J 21.11.2018, L295/39.

Declaration on confidentiality / data protection of the external processors are also published on F4E Net.

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