



**PRIVACY NOTICE ON PERSONAL DATA PROTECTION REGARDING  
 360° Feedback Exercise**

The objective of this Notice is to inform you about the collection and processing of your personal data in line with the applicable Data Protection Regulation 2018/1725<sup>1</sup>.

**TABLE OF CONTENT**

1. ***Why does F4E process my personal data? Whose data is processed?***
2. ***What is the justification for the processing?***
3. ***Which data is F4E processing?***
4. ***Who has access to my data?***
5. ***How long does F4E store my data?***
6. ***Does F4E intend to transfer my data to third countries or International Organizations?***
7. ***What are my rights in relation to my data and how can I exercise them?***
8. ***Contact details of the Data Protection Officer***
9. ***Right of recourse***

**1. Why does F4E process my personal data?  
 Whose data is processed?**

The data processing concerns the 360° assessment exercise. The purpose of this procedure is twofold:

- Individual purpose: allow managers to receive feedback from various sources concerning their strengths and weaknesses in a wide range of competency areas;
- Collective purpose: provide a picture of F4E managerial culture.

The different categories of persons potentially affected by the processing of personal data within the 360 degree feedback are:

- Managers subject to evaluation, hereinafter the 'assessee': members of the Senior Management team, Middle Managers and Group Leaders whose group is composed of 4 persons or more and who

have at least 9 months seniority in the functions;

- Contributors: subordinates, peers, superiors and others (the last category corresponds to anyone, including outside F4E, it is chosen by the assessee and is optional).

**2. What is the justification for the processing?**

Processing of your data is necessary for the performance of F4E tasks on the basis of the F4E founding instrument and/or other legal instrument adopted on the basis thereof or for compliance with a specific legal obligation F4E is subject to.

It is based on:

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 10 February 2015 (2015/224 Euratom), O.J. L 37, 13.2.2015, 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 10 February 2015, in particular Article 10 thereof;

Staff Regulations of Officials (SR) and the Conditions of Employment of Other Servants of the European Communities (CEOS), in particular Article 24 of the Staff Regulations regarding professional development.

F4E Integrated Management System Standards (F4E\_D\_24LQJM) of 25/07/2012, standard n°4 on Human Resources and learning and development needs.

The Data Subject has given free and informed consent for the data processing by signing a consent form (one specific for Senior Management team (F4E\_D\_2L7AC2), one specific for other participants (F4E\_D\_2LTLMT)).

### 3. Which data is F4E processing?

#### a) General personal data:

- Full name, position, e-mail address, language and gender of the assessee;
- Full name, category (subordinates, peers, superiors, others), gender, e-mail address of the contributors;

#### In the consent Forms:

Name, surname, date, signature, consent to take part in the exercise on voluntary basis, results being used for statistical purposes, individual results accessed.

#### In the assessment report:

- Assessment on the managerial skills of the assessee produced by the manager himself / herself and by the contributors;
- Opinions of the contributors reflected as open comments or suggestions on the managerial competencies of the manager concerned;
- Individual outcome of the assessment (quantitatively and qualitatively). If there are less than 3 contributors in one of the category peers, subordinates and/or others, the results are not presented separately (to protect anonymity). This individual report also reflects the results by competency areas and by statements within the competency area. On this basis, the external

provider draws a series of operational conclusions (including, where appropriate, the highlighting of diverging perceptions for a single issue between categories of 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.

### 4. Who has access to my data?

In order to provide a clear and structured information, the recipients are listed for each type of processing.

The exercise involves two processors in addition to F4E:

- F4E contractor: The Greenhouse Group (see privacy statement attached in IDM);
- A sub-contractor of The Greenhouse Group: Leadership Circle LLC (see privacy statement attached in IDM).

Leadership Circle LLC collects the questionnaires on the managers who participate in the exercise through its own assessment tool and produces individual and group reports whereas The Greenhouse Group is responsible for individual and groups debriefings as well as the summary report to the attention of HR on trends for learning and development purpose.

#### Consent Forms:

#### External Processor:

- The Greenhouse Group (including The Greenhouse Group coach in charge of administering the 360° assessment for F4E), in line with their privacy notice;
- External Coach in case the manager decides that s/he voluntarily wants to share the data with him/her in order to make sure that the manager agreed to take part in the exercise.

#### F4E recipients:

- Director
- Head of HR
- 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 The 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, but they indicate the category of each respondent that makes the contributions (subordinates, peers, superiors or others). Contributors ignore the identity and the contents of the contributions made by others.

#### **Individual Reports:**

##### **External Processor:**

- Leadership Circle LLC, in line with their privacy notice;
- The Greenhouse Group (including The Greenhouse Group coach in charge of administering the 360° assessment for F4E), in line with their privacy notice;
- External Coach in case the manager 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 individual report prepared by the external provider.

#### **Group Reports (no personal data included):**

##### **External Processor:**

- Leadership Circle LLC, in line with their privacy notice;
- The Greenhouse Group (including The Greenhouse Group coach in charge of administering the 360° assessment for F4E), in line with their privacy notice;
- External coach: the data from the group reports may be used for coaching purposes by any external coach working for leadership development programme at F4E.

##### **F4E recipients:**

All F4E staff, so as to provide feedback on the exercise and foster a feedback culture.

#### **Report to HR on tendencies for Learning & Development purpose (no personal data included):**

This report is addressed to HR only and contains a summary of the tendencies following the 360° exercise, for Learning & Development purpose.

##### **F4E recipients:**

- F4E Learning & Development HR team
- Head of HR

#### **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: DPO and Anti-Fraud & Ethics Officer, Head and/ or responsible officer of LSU, IAC, IDOC.

#### **5. How long does F4E store my data?**

The electronic HR file containing 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 reports (individual, group and on learning and development) are delivered.

Group reports and Report to HR on Learning & Development contain no personal data and are therefore kept indefinitely so as to allow F4E to ensure comparison of managerial capability within the organisation over time and monitoring of Learning & Development strategy in that respect.

#### **6. Does F4E intend to transfer my data to third countries or International Organizations?**

No.

#### **7. What are my rights in relation to my data and how can I exercise them?**

You have the right to access your personal data, to correct any inaccurate or incomplete data, to request restriction or erasure, or to object to the processing, pursuant to Articles 14(3) and 17-23 of Regulation 2018/1725.

Any request to exercise one of those rights should be directed to the Controller ([HR-DataProtection@f4e.europa.eu](mailto:HR-DataProtection@f4e.europa.eu)). Where you wish to exercise your rights in the context of one or several

specific processing operations or files, please provide their description and reference(s) in your request.

Exceptions based on Article 25 of Regulation 2018/1725 may apply [See Governing Board Decision of 9 December 2019<sup>2</sup>]. In that case, the data subject shall be informed of the principal reasons for applying such restrictions.

#### 8. Contact details of the Data Protection Officer

You may contact the Data Protection Officer (DPO) of F4E (DataProtectionOfficer@f4e.europa.eu) with regard to issues related to the processing of your personal data under Regulation 2018/1725.

#### 9. Right of recourse

You have the right of recourse to the European Data Protection Supervisor ([EDPS@edps.europa.eu](mailto:EDPS@edps.europa.eu)), if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by F4E.

May 2020

*(Based on template version F4E\_D\_2CJF8A v1.9)*

---

<sup>1</sup> 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. This Privacy Notice is in line with Article 14 and 15 of that Regulation (Principle of Transparency).

<sup>2</sup> [O.J., 10.02.2020, L 37/18](#).