



Data Protection Notice

REA Managers Feedback Exercise

In accordance with the Regulation (EU) 2018/1725 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data¹ ('the Regulation'), the European Research Executive Agency ('the Agency' or 'REA') collects your personal information only to the extent necessary to fulfil a precise purpose related to our tasks.

1. WHY DO WE COLLECT YOUR PERSONAL DATA?

The purpose of the processing is to allow REA Managers participating in this exercise ("Reviewees"), from a developmental perspective, to obtain feedback on their management and leadership skills and to help them develop their competencies.

The data will not be used in any form of evaluation (appraisal) process of the persons involved. REA staff conducting the reviews include the Director, Heads of Department, Heads of Unit, Deputy Heads of Unit and Heads of Sector as well as REA staff members selected by the Reviewees and invited to give their feedback ("Reviewers").

In the context of REA Learning and Development Strategy 2023 (chapter 4.1. on "Support managers and staff to work efficiently in the hybrid working environment") and in line with the Commission's policy on middle management, managerial excellence and subsequent continuous development of middle managers has been identified as strategic priority area.

2. WHO IS RESPONSIBLE FOR THIS PROCESS?

The controller is the European Research Executive Agency (REA), represented by its Director. For organisational reasons, the role of the data controller has been entrusted by the Director to the delegated controller and is exercised by REA Head of Unit "People and Workplace" (REA.D.2.). The data controller may be contacted via functional mailbox: REA-TRAINING@EC.EUROPA.EU

Processors:

To organise the development programme for its managers, REA uses a Framework Contract EPSO/EUSA/PO/2018/028- LOT2, Coaching for Managers & Teams, signed between the European School of Administration (EUSA) and the Greenhouse Group for the delivery of coaching/consultancy services for the staff in the European institutions, bodies and agencies. This contract includes an article on Processing of Personal Data for data protection (Article I.9). Under this framework service contract, the Agency will contract services directly from the Greenhouse Group for the development programme: "REA managers feedback exercise" for its management.

¹ Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC (OJ L 295 of 21.11.2018, p.39).

The Greenhouse Group (“the Contractor”): The Greenhouse Group, rue de la Montagne 54/56 (B3), 1000 Brussels, email: info@greenhouse-group.com

Performance Consultants (“the Subcontractor”) is a sub-processor to the Greenhouse Group for conducting surveys and assessment in the framework of managers feedback exercises. Performance Consultants (International) Ltd, 93 Ifield Road, London W10 9AS, UK.

3. WHAT IS THE LEGAL BASIS TO COLLECT YOUR DATA?

Article 5.1 (a) and (b) of the Regulation:

(a) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body;²

(b) processing is necessary for compliance with a legal obligation to which the controller is subject;

Other legal basis:

- Articles 24(a) and 110 of the Staff Regulations and Art. 11 and 81 of the Conditions of Employment of Other Servants of the European Union
- REA/SC(2017)1.5.2: [Steering Committee decision adopting implementing rules to the Staff Regulations on Learning and Development](#)
- C(2016) 3828 final: [Commission decision on implementation of the Learning and Development strategy of the European Commission](#)
- C(2016) 3855 final: [Annex to the Commission decision on training on the own initiative of the member of staff](#)
- C(2016) 3827 final: [Commission decision repealing existing rules on learning and development](#)
- Point 5.1.5 of the Commission's Learning and Development Strategy outlines the specific support for managers to help them growing in their role, in driving the policy of the Institution and in supporting the learning of their staff. One of the measures proposed is a system of staff feedback as a learning tool for middle and senior managers. The annual exercise was established following previous procedures completed in REA in 2018 and 2019.

4. WHICH PERSONAL DATA ARE COLLECTED?

² The legal basis under Article 5(1): **Council Regulation (EC) No 58/2003** of 19 December 2002 laying down the statute for executive agencies to be entrusted with certain tasks in the management of Community programmes, OJ L 11, 16.1.2003; **REA Establishment act: COMMISSION IMPLEMENTING DECISION (EU) 2021/173** of 12 February 2021 establishing the European Climate, Infrastructure and Environment Executive Agency, the European Health and Digital Executive Agency, the European Research Executive Agency, the European Innovation Council and SMEs Executive Agency, the European Research Council Executive Agency, and the European Education and Culture Executive Agency and repealing Implementing Decisions 2013/801/EU, 2013/771/EU, 2013/778/EU, 2013/779/EU, 2013/776/EU and 2013/770/EU, OJ L 50, 15.2.2021; **REA Delegation Act: COMMISSION DECISION C(2021)952** of 12.2.2021 delegating powers to the European Research Executive Agency with a view to the performance of tasks linked to the implementation of Union programmes in the field of Research and Innovation, Research of the Fund for Coal and Steel and Information Provision and Promotion Measures concerning Agricultural Products comprising, in particular, implementation of appropriations entered in the general budget of the Union.

For Reviewees and Reviewers:

- First name, surname, email address, telephone number, title, position, administrative entity and seniority in the function.

For Reviewees:

- Information provided by the Reviewees on their own perception of their competencies related to the Agency's leadership competency model;
- Information provided by Reviewers on their perception of the Reviewees' competencies related to the Agency's leadership competency model;
- Recommendations on training and on-the-job development activities matching development needs of Reviewees.

Additionally, the Reviewee receives the anonymous, amalgamated report of the feedback. In these individual reports, the free text comments provided by the Reviewers could potentially contain personal data leading to the identification of individual Reviewers or the recognition of a particular writing style. In addition, the Reviewee may become identifiable if they describe specific work situations known to their manager.

However, Reviewers will not be identified in the individual feedback reports received by the Reviewees or by the Coach.

For the Coach:

- Name, surname, telephone number, email address and title.

The processing of this personal data will not include automated decision-making (such as profiling).

5. WHO WILL HAVE ACCESS TO YOUR PERSONAL DATA?

a. WHO WILL HAVE ACCESS TO THE DATA WITHIN THE AGENCY?

Authorised REA HR staff will receive only group reports aggregated at Department and Agency level, without the possibility to identify an individual. The group report aggregates data of all Reviewees, to give a general idea of the feedback received by the group of Reviewees as a whole.

Reviewees receive their individual feedback report with an individual access code to enter their comments/evaluation. The Reviewee has access to her/his individual report only, provided by the external supplier. There is no obligation for the Reviewees to share the reports with anybody but the Coach.

b. WHO WILL HAVE ACCESS TO THE DATA OUTSIDE THE AGENCY?

The competent staff of the Contractor and its Subcontractor(s) receive and process your personal data (for both Reviewees and Reviewers).

This transmission is restricted to the information necessary for the legitimate performance of tasks within the competence of the recipient. The recipients of the data are reminded of their obligation not to use the data received for other purposes than the one for which they were transmitted. A certified Coach from the Subcontractor will receive the same individual report as a support for the feedback session.

The feedback by Reviewers is provided online and access is given only to persons who obtained an individual access code to enter their comments/evaluation. The Reviewee has access to her/his individual feedback report only, provided by the Contractor.

REA HR will not receive a copy of the individual feedback reports, neither the Reviewee nor the Reviewer.

REA HR will receive and kept a copy of the group reports; this report does not contain any personal data.

Your personal data may be transferred to UK solely to allow the Contractor and Subcontractor to carry out the assigned tasks on behalf of the controller that acts within its competence. These transfers are covered by an adequacy decision³ that ensures an adequate level of protection to the data subjects (Art 47(4)). Your personal data will not be transferred outside EU/EEA without an adequacy decision, or to international organisations.

In addition, your data may be disclosed to public authorities, which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law and shall not be regarded as recipient (such as the European Court of Justice, OLAF, EPPO, etc.). The processing of those data by those public authorities shall comply with the applicable data protection rules according to the purpose of the processing.

6. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

The data collected for the launch and completion of the managers' feedback questionnaire are kept by the external Contractor or its Sub-contractor after the completed questionnaire completion and then deleted after the individual reports are generated and given to the participating managers.

Once the Reviewees have obtained the individual feedback reports, an anonymous group report is created for the exercise. All the individual these reports will be deleted automatically by the Contractor or its Subcontractor after 12 months.

In accordance with Article II.9 of the EPSO/EUSA/PO/2018/028 - Lot 2: "The duration of processing of personal data by the Contractor will not exceed the period referred to in Article II.24.2. Upon expiry of this period, the Contractor shall, at the choice of the controller, return, without any undue delay in a commonly agreed format, all personal data processed on behalf of the controller and the copies thereof or shall effectively delete all personal data unless Union or national law requires a longer storage of personal data".

For checks and audits:

The Contractor keeps all original documents stored on any appropriate medium, including digitised originals if authorised under national law, for a period of five years starting from the payment of the balance of the last specific contract issued under the framework contract (EPSO/EUSA/PO/2018/028 – Lot 2.).

REA applies the principles and retention periods indicated in the Common Retention List (CRL) of the Commission (SEC (2019) 900/2) by analogy. Files documenting the organisation of the exercise, namely the names of who has expressed interest in participating and who was selected in which year for previous exercises and the anonymous aggregated group report of the exercise, will be retained by REA HR for 5 years (CRL 12.3.4.) to allow the preparation of similar exercises in following years.

7. WHAT ARE YOUR RIGHTS?

You may have access to your personal data and may exercise your right of information / access / rectification / erasure / restriction / data portability / objection / withdrawal of consent by contacting the data controller at: rea-training@ec.europa.eu

³ [Adequacy decisions \(europa.eu\)](https://european-council.europa.eu/media/en/press-articles/2020/07/adequacy-decisions-europa.eu)

Any request from a data subject to exercise a right will be dealt within one month from receipt of the request. This period may be extended pursuant to Article 14(3) of Regulation (EU) 2018/1725.

Your right to information, access, rectification, erasure, restriction or objection to processing, communication of a personal data breach or due to confidentiality of electronic communications may be restricted only under certain specific conditions as set out in the applicable [Restriction Decision](#) in accordance with Article 25 of Regulation (EU) 2018/1725.

8. CONTACT INFORMATION

In case you have any questions about the collection/processing of your personal data, you may contact the data controller who is responsible for this processing activity by using the following email address: REA-TRAINING@ec.europa.eu

In addition, you may also contact:

REA Data Protection Officer (DPO): REA-DATA-PROTECTION-OFFICER@ec.europa.eu

In case of conflict, complaints can be addressed to the European Data Protection Supervisor: EDPS@edps.europa.eu.