

RECORD OF PROCESSING ACTIVITY

360° Multi-source feedback exercise tool

1. Controller(s) of data processing activities

Controller: European Central Bank (ECB)

Organisational unit responsible for the processing activity: European Central Bank (ECB)/ Directorate General Human Resources (DG HR)

Data Protection Officer (DPO): DPO@ecb.europa.eu

2. Who is actually conducting the processing activity?

- The data is processed by the ECB itself
The organisational unit conducting the processing activity is:
Directorate General Human Resources, Talent management Division
- The ECB is using Deloitte LLP as data processor and Profiling Online as sub-processor in the context of the leadership 360-degree feedback exercise.

3. Purpose of the processing

The purpose of the 360-degree feedback exercise is to support the individual professional development of leaders at the ECB by soliciting a 360-degree feedback on their competencies in line with the ECB's competency framework, and providing this to them in an individual development report.

4. Description of the categories of data subjects

Whose personal data are being processed?

- ECB staff
- Externals (agency staff, consultants, trainees or secondees)
- NCB or NCA counterparts (in the ESCB or SSM context)
- Visitors to the ECB, including conference participants and speakers
- Contractors providing goods or services
- Complainants, correspondents and enquirers
- Relatives of the data subject
- Other (please specify):

5. Description of the categories of personal data processed**(a) General personal data:**

The personal data contains:

- Personal details (name, address etc)
- Education & Training details
- Employment details
- Financial details
- Family, lifestyle and social circumstances
- Goods or services provided

- Other (please give details): Rating of specific behavioural competencies; open text comments regarding areas of strength/ weakness/ recommendations for improvement for the recipients of the feedback.

(b) Special categories of personal data

The personal data reveals:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic data, biometric data for the purpose of uniquely identifying a natural person or data concerning health
- Data regarding a natural person's sex life or sexual orientation

6. The categories of recipients to whom the personal data have been or will be disclosed, including the recipients of the data in Member States, third countries or international organisations

- Data subjects themselves
- Managers of data subjects
- Designated ECB staff members
- Designated NCB or NCA staff members in the ESCB or SSM context
- Other (please specify): selected employees of the services provider Deloitte and Profiling Online (feedback platform provider) who are involved in the 360-degree feedback exercise.

7. Transfers to/Access from third countries or an international organisation

Data are processed by third country entities:

Yes

Specify to which countries: Data are processed by Deloitte LLP and Profiling Online located in the United Kingdom, based on an [Adequacy Decision of the European Commission](#).

Specify under which safeguards:

Adequacy Decision of the European Commission

Standard Contractual Clauses

Binding Corporate Rules

Administrative arrangement containing enforceable and effective data subject rights

If the third country's legislation and/or practices impinge on the effectiveness of appropriate safeguards, the personal data can only be transferred to, accessed from or processed in such third country when sufficient 'supplementary measures' are taken to ensure an essentially equivalent level of protection to that guaranteed within the EEA. These supplementary measures are implemented on a case-by case basis and may be technical (such as encryption), organisational and/or contractual.

No

8. Retention time

The personal data are stored on the external provider's database for a maximum of 24 months and are deleted thereafter. Anonymised aggregate reports shall be retained for 10 years by the ECB.