

360 ASSESSMENT EXERCISE FOR MANAGERS

Record of processing activity	
Title	360 assessment exercise for managers
Name and contact details of controller	ENISA, Corporate Support Services, Human Resources (HR), HR-general@enisa.europa.eu.
Name and contact details of DPO	dataprotection@enisa.europa.eu
Name and contact details of Joint Controller	N/A
Name and contact details of processor	External contractor Hudson Solutions Belgium NVA, only for the specific 360 degrees assessment exercise and only for the participants officially invited to take part in the exercise (reviewees and reviewers). This service has been purchased by ENISA via a Purchase Order, subject to ENISA's general terms and conditions, and is a one-off exercise. The 360 assessment is conducted with the use of the data processor's web-based application (AQM), which is stored in Microsoft Azure infrastructure (sub-processor), under specific contract with the data processor and hosted within EU.
Purpose of the processing	<p>The purpose of this processing operation is to conduct a 360 degrees assessment exercise for managers (Executive Director, Heads of Units, Team Leaders, Heads of Sectors), which will allow the participants to evaluate their own performance, and for their performance to be, in turn, evaluated by their colleagues, manager, direct reports and others. The purpose of the exercise and subsequent data processing is to promote personal development and growth of the managerial team.</p> <p>There are 4 categories of staff members (reviewers) who are invited to contribute to the 360-assessment exercise for managers (reviewees):</p> <ul style="list-style-type: none"> - Manager: this category includes the direct hierarchical supervisor of the reviewee (1 person) - Colleagues: this category includes colleagues with whom the reviewee works directly and who report to the same direct hierarchical supervisor, as well as colleagues who work at the same level as the reviewee and may report to a different supervisor (6 to 8 people) - Direct reports: this category includes staff members who report to the reviewee (6 to 8 people) -Others: this category includes other staff members of ENISA with whom the reviewee works with, but who do not belong to any of the above categories. These may be internal "customers" or other staff members (6 to 8 respondents). <p>The process is as follows: The reviewee proposes a list of reviewers to ENISA's HR (based on the aforementioned categories). The proposed reviewers are invited to complete an assessment of the reviewee, as part of his/her 360- assessment exercise (participation for reviewers is voluntary). The conduction of the 360- assessment takes place in the dedicated platform provided by the data processor. The questionnaire includes both multiple choice questions (58 statements) and open-ended questions (3 open questions). At the end of the assessment period, the processor will produce aggregated assessment reports (without including individual assessments) for each of the reviewees. The individual assessments (conducted by reviewers) are kept by the processor and will be deleted as soon as possible, after having provided the aggregated reports to the ENISA's HR. Each reviewee receives a copy of his/her aggregated report (no individual</p>



	responses provided). The aggregated reports of all reviewees shall also be shared with the ENISA's Executive Director.
Description of data subjects	- Managers (Executive Director, Heads of Units, Team Leaders, Heads of Sectors) who are undertaking the 360 evaluation (reviewees). - Staff members (reviewers) who are invited to contribute to the 360-assessment exercise for managers (reviewees).
Description of data categories	<p>The following personal data are being processed:</p> <p>For the reviewees:</p> <ul style="list-style-type: none"> -General identification information: Name; unit; email address; position (only for the Heads of Unit/Team Leaders/Heads of Sector). -Individual assessments related to each reviewee provided by reviewers (processed only by the data processor). -Aggregated report from the 360-assessment exercise for each reviewee (processed by the data processor and ENISA's HR). <p>For the reviewers:</p> <ul style="list-style-type: none"> -Name; unit; email address – as provided in proposed lists by reviewees (processed by ENISA's HR and data processor). - Individual assessments provided by the reviewers for the reviewees, in which personal opinions of the reviewers are expressed (processed only by the data processor). <p>The final feedback received from the exercise (aggregated report) will be per reviewer category, not on the level of the individual reviewer. Hence, there are between 6-8 reviewers per category.</p> <p>Nevertheless, it should be mentioned that it cannot be entirely excluded that the aggregated reports could potentially contain identifiable information related to the reviewers. In addition, the category 'manager' consists of only one person and thus confidentiality cannot be guaranteed for this category.</p>
Time limits (for the erasure of data)	<p>The individual assessments will be deleted by the data processor as soon as possible after the aggregated reports are sent to the ENISA's HR.</p> <p>The aggregated reports will be deleted by ENISA's HR as soon as possible, upon completion of the overall exercise.</p>
Data recipients	<p>The recipients of the data will be as follows:</p> <p>For the reviewees:</p> <ul style="list-style-type: none"> - Designated ENISA's HR staff members that are responsible for managing the exercise – only for the general identification information and the aggregated reports. - Designated staff from Hudson Solutions (data processor) – access to all types of data (general identification, individual assessments, aggregated reports). - The Executive Director of ENISA – only for the general identification information and the aggregated reports. <p>For the reviewers:</p> <ul style="list-style-type: none"> - Designated ENISA's HR staff members that are responsible for managing the exercise – only access to the proposed list of reviewers per reviewee. - Designated staff from Hudson Solutions (data processor) – access to identification data and individual reports provided by each reviewer.
Transfers to third countries	The personal data are stored at rest within the EU (data processor's Microsoft Azure data centers in the Netherlands). No transfers of personal data outside the EU/EEA are in principle envisaged; the data processor has committed, under the contract with ENISA, to put in place all necessary safeguards for transfers under Chapter V GRPR.
Security measures - General description	Security policy of ENISA's internal systems; security measures of the data processor (and sub-processor) as mandated under specific contract with ENISA.
Privacy statement	Communicated to all ENISA staff members that participated in the exercise.