



European Committee  
of the Regions

## Record of processing activity – Working document

### 360 Feedback evaluation

#### PART 1 - Record

##### 1. General Information

Reference number	RE3-4
Last update	26/09/2024
Controller	European Committee of the Regions
Directorate	Directorate E
Unit	E.3 Working conditions and talent management
Contact details	feedbackcoordinator@cor.europa.eu
Joint controller	N/A
Joint controllership arrangement	N/A
DPO contact details	<a href="mailto:data.protection@cor.europa.eu">data.protection@cor.europa.eu</a>
Processor(s)	External provider pursuant to the framework contract in force - in the case at hand -> Performance Consultants
Data processing agreement	See current framework contract

##### 2. Purpose and description of the personal data processing

Purpose(s) of the personal data processing	<p>The 360 degree feedback constitutes an HR tool allowing managers to receive feedback from various sources (staff, peers, superiors, other stakeholders) concerning their behavioural strengths and weaknesses in a wide range of competency areas, on the basis of a survey sent and completed by themselves, as well as by a statistically representative sample of respondents (staff, peers, superiors, other stakeholders). It can help to increase the individuals' awareness of how their performance is viewed by their colleagues and how it compares with their own impression of their performance. The results of the 360 degree exercise shall contribute to the development of managerial skills by managers, and as a consequence to a positive and constructive working environment within their services.</p>
Categories of persons whose personal data are processed	<p>Description of the categories of persons</p> <ul style="list-style-type: none"><li>-Participants (members of the management team subject to evaluation: Heads of Unit, Directors and Deputy Directors [job holder]).</li><li>-Employees assigned to their services [staff].</li><li>-Other members of the management or other contributors external to the directorate and/or the institution with whom the manager concerned has regular contact as part of his/her duties [peers].</li></ul>

	<p>- Supervisor(s) of the manager concerned [superior]  - Persons involved in the processing of the data are: External provider pursuant to the framework contract in force</p>
Categories of personal data processed	<p>Personal data processed as part of the 360 degree feedback exercise are mainly:</p> <ol style="list-style-type: none"> <li>1) full name, position and e-mail address of the manager concerned;</li> <li>2) full name, category (staff, peers and or superior) and e-mail address of the contributors;</li> <li>3) assessment on the managerial skills and competencies of the manager concerned produced by the jobholder and by the contributors;</li> <li>4) opinions of the contributors reflected as open comments regarding the managerial skills of the participant.</li> </ol>
Recipients of the personal data	<ul style="list-style-type: none"> <li>• The external provider in charge of processing the data.</li> <li>• The participant in the 360 degree feedback exercise himself/herself</li> <li>• A certified coach, selected by the jobholder, receives a copy of the report for the one-to-one debrief</li> <li>• The coordinator of the exercise does not have access to the report, nor any other person except the jobholder and the coach s/he selected</li> </ul>
Transfers of personal data to a third country or an international organization	No
Retention period of the personal data	<p>The feedback data collected through the 360° tool is limited to 3 months after a completed operation. The individual 360° Leadership Feedback Report will be stored on the server of the external provider for 3 months only. The owner of the individual report is the concerned participant. The HR service within the CoR organising the exercise will not receive or store a copy of it. Once the participant has obtained the individual 360° report, the 360° report will be deleted automatically by the external provider after 3 months. Contrary to the collected feedback data, the data linked to the organization of the training, notably the list of participants, is collected and stored by the training service for a maximum period of 10 years, in order to trace who took part in the exercise and avoid unbalanced registrations to the different cycles (ensuring that not always the same applicants take part versus people who have never participate in the evaluation).</p>
General description of security measures, where possible	<p>The feedback data collected through the 360° tool will be deleted after 3 months after the delivering of the report. The individual 360° Leadership Feedback Report will be stored on the server of the external provider for 3 months. The owner of the individual report is the concerned participant and CoR Administration will not receive or store a copy of it.</p> <p>The data linked to the organization of the training, notably the list of participants, is kept by the training service for a maximum period of 10 years (equivalent to two 5-year cycles).</p>

Data protection notice

Published internally