



NOTIFICATION FORM

FOR DATA PROCESSING OPERATIONS

- To be filled out by the Data protection Officer -

Date of registration: 16.1.2014

Register No: HR14

1. Name of the data processing operation

Leadership Orientations Questionnaires (LOQ/HPMQ)

2. Data Controller

Programme or Group:	ADS1 – Human resource management
Function:	Training and career development coordinator
Contact person:	Mr Luis Pinto; Luis.Pinto@eea.europa.eu

3. Description of the processing operation

3.1. Area of activity in which the processing is carried out

The EEA is creating a leadership competency framework for all its leaders that describes the desirable behaviours across hierarchical level, the areas of expertise, cultural background and so on.

For the purpose of this project, EEA wishes to provide an effective and efficient assessment of leaders' preferences on the basis of a Leadership Orientations Questionnaire (LOQ). This is an online psychometric tool designed specifically for leadership assessment provided by the company Kenexa. The LOQ assesses an individual's natural preference (or capacity) for leadership and what motivates them for high performance, using two online questionnaires. The diagnostic helps identify whether an individual has a technical or general leadership preference which will be beneficial for the individual but also for the EEA in order to identify relevant career paths for each person.

The tool has an approximate completion time of 30-40 minutes and is available online. Following completion, individual developmental feedback and reports are provided. These describe the individual leaders' preference in various domains that can be mapped to the EEA competency framework.

The High Performance Motivations Questionnaire (HPMQ) is an online self-report questionnaire that assesses an individual's underpinning motivations which drive the long-term goals which

people have in the world of work. The tool has an approximate completion time of 20-30 minutes and is delivered online. A combined individual report is provided for each individual with the outcomes of both the LOQ and HPMQ assessments.

In addition, a group report will be provided which will reflect the total leadership team's current areas of strength, against the requirements of the EEA competency framework and external benchmarks for high performing leaders, as well as identifying potential areas of risk where particular competencies are under-represented.

Following the delivery of the individual reports, it is foreseen to follow-up with supportive coaching session to aid the interested leader in understanding their report, it's relevance to their performance and possible responses or courses of action which may be appropriate for them and their careers.

3.2. Modalities for the processing operation

<input checked="" type="checkbox"/> Manual processing <i>(please describe)</i>	The EEA training and career development coordinator within the Human Resource Management Group will provide a list of staff members with their name, function and email address to the external service provider for enabling him to send individual electronic invitation to access the online tool.
<input checked="" type="checkbox"/> Automated processing <i>(please describe)</i>	The data subject will enter his/her personal data directly in the online tool. The individual responses to the questionnaires will then be assessed and benchmarked on the basis of the methodology developed by the external service provider Kenexa.

3.3. Are the Personal data processed by an entity external to EEA ('processor')

<input checked="" type="checkbox"/>	Yes, see EEA Master Agreement signed on 9.1.2014 with Kenexa an IBM Company, in particular Article 15.15 thereof.
<input type="checkbox"/>	No

4. Lawfulness and purpose of the processing

4.1. Legal basis

Master Agreement entered into between the EEA and Kenexa an IBM Company on 9.1.2014. There is no restriction under Article 20 of Regulation (EC) No 45/2001. The processing operation is not subject to Article 27 of Regulation (EC) No 45/2001.

4.2. Grounds for lawfulness

The data processing is considered lawful because:

- it is necessary for the performance and the support of a task carried out in the public interest on the basis of Regulation (EC) No 401/2009 or in the legitimate exercise of official authority vested in the EEA (Article 5(a) of Regulation (EC) No 45/2001, and
- the data subject has unambiguously given his or her consent (Article 5(d) of Regulation (EC) No 45/2001).

4.3. Purpose of the processing

As described under 4.1 above.

Each data subject may choose to use the recommendations specified in the individual developmental feedback report to feed into his/her career development cycle (CDC).

5. Features of the processing operation

5.1. Categories of data subjects concerned

Staff members currently employed at the EEA holding a management function as Head of Programme or Head of Group or holding an advisory function as Senior Adviser.

5.2. Categories of data

Basic administrative data related to the staff member such as his/her name, function (Head of Programme/Head of Group/Senior adviser), email address

Information and data entered by the staff member in response to the questionnaires (LOQ, HPMQ).

6. Retention practice of personal data

The personal data will be retained for the duration of the EEA Master Agreement with Kenexa (i.e. a period of maximum 6 months which may not exceed 30.6.2014). Upon completion of the agreement, the data will be destroyed.

7. Personal data processed for historical, statistical or scientific purposes

Purpose	Categories of data	Storage media
<input type="checkbox"/> Historical	Not applicable	<input type="checkbox"/> Anonymous <input type="checkbox"/> Encrypted
<input type="checkbox"/> Statistical	Not applicable	<input type="checkbox"/> Anonymous <input type="checkbox"/> Encrypted
<input type="checkbox"/> Scientific	Not applicable	<input type="checkbox"/> Anonymous <input type="checkbox"/> Encrypted

8. Recipients or categories of recipients to whom the data might be disclosed

A limited number of authorised persons of Kenexa who will analyse and draw the individual developmental feedback reports.

The group level report, containing aggregated anonymous data, will be provided to the EEA training and career development coordinator.

9. Proposed transfer of personal data to third countries or international organisations

Yes

No transfer of personal data to third countries or international organisation

10. Information given to the data subjects

See the privacy statement attached as annex 1 to this notification.

11. Procedures to enable data subjects to exercise their rights

This is built in the LOQ and HPMQ questionnaires: each data subject can directly check his/her personal data on-line. Data subjects have a right to access their personal data and may request to update and rectify them at any time.

12. Time limits for blocking and erasure of the different categories of personal data

The data controller will respond to justified legitimate request from a data subject immediately and instruct the data processor accordingly.

Categories of data	Blocking	Erasure
Any data asked for	Usually immediately but at maximum within 5 working days	Usually immediately but at maximum within 5 working days