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ECB-PUBLIC  
UPDATABLE

## RECORD OF PROCESSING ACTIVITY

360° Multi-source feedback exercise tool

### 1. Controller(s) of data processing activities

Controller: European Central Bank (ECB)

Contact details:

*European Central Bank*

*Sonnemannstrasse 22*

*60314 Frankfurt am Main*

*Germany*

*E-mail: [info@ecb.europa.eu](mailto:info@ecb.europa.eu)*

Organisational unit responsible for the processing activity: Directorate General Human Resources (DG-HR)

Data Protection Officer (DPO): [DPO@ecb.europa.eu](mailto: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 (DG-HR)

The data is processed by a third party (contractor) or the processing activity is conducted together with an external third party: Cubiks

### 3. Purpose of the processing

The MSF is to support the individual professional development of managers by soliciting a 360° assessment of and feedback on defined behaviours within the ECB's competency and values framework and providing this to the participating staff members.

For further details please read the [EDPS Prior Checking Opinion](#).

### 4. Description of the categories of data subjects

- ECB employee(s)

### 5. Description of the categories of personal data processed

#### (a) General personal data:

The personal data contains:

- Personal details (name, address etc)
- Employment details
- Other (please give details):
- *Rating of specific behavioral competencies*
  - *Open text comments regarding areas of strength/ weakness/ recommendations for improvement for the recipients of the feedback*

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

- Data subjects themselves
- Designated ECB staff members

Other (please specify):

*The identification data of the data subjects shall only be disclosed to the data processor i.e. the administrators at Cubiks assigned to this project.*

## **7. Retention time**

The personal data is stored on the external provider's database for a maximum of 4 years, commencing on the date of the completion of the assessment.

Anonymised aggregate reports shall be retained for 10 years by the ECB.