



EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

6 August 2026
EMA/183540/2026

Records of data processing activity for the 360° assessment (public)

1.	Last update of this record, version number:	6 August 2026		
2.	Reference number:	A-079		
3.	Name and contact details of controller:	European Medicines Agency Internally: the Head of Administration and Corporate Management Division Contact: datacontroller.administration@ema.europa.eu		
4.	Name and contact details of DPO:	dataprotection@ema.europa.eu		
5.	Name and contact details of joint controller (where applicable)	N/A		
6.	Name and contact details of processor (where applicable)	Processor	Activity	Contact Details
		Julhiet Sterwen	Coaching, consulting services and 360° feedback review mechanism services	3 rue des Gravieres, 92200, Neuilly-sur-Seine-France rgpd@julhiet-sterwen.com
		PerformanSE	Collection and categorisation of answers to questionnaires, consulting services	4 rue Marcel Paul, 44000, Nantes-France dpo@performanse.com
		Microsoft Ireland Operations Limited	MS 365 services and applications to support EMA's administrative tasks and reporting processes	One Microsoft Place, South County Business Park, Carmanhall and Leopardstown, D18 P521, Dublin-Ireland https://www.microsoft.com/en-us/concern/privacyrequest-msa
7.	Purpose of the processing	The purpose of this data processing activity is that through the 360° feedback reviews, managers will be able to raise their self-awareness about their management strengths and areas for further development, to understand the expectations of their		



		staff and identify the points on which they can continue to learn and develop. More concretely these feedback reviews help managers to: • collect perceptions from a wide range of people who interact with them professionally: managers, peers, direct reports, third parties; • compare their self-perception and the perception of others on several professional competencies and behaviours; • identify and recognise strengths and areas for development; and • get valuable insights for the creation of a professional development plan. The questionnaire is designed for EMA staff members holding managerial positions, based on behavioural competences set out in the EMA's competency model. Participation in the 360° assessments is voluntary for managers. This activity is intended solely for professional growth and is distinct from any form of formal appraisal.
8.	Description of categories of persons whose data EMA processes and list of data categories	<u>Categories of persons</u> Staff members holding managerial positions (reviewees) and participants (external or internal to EMA/observers) in the questionnaires. <u>Categories of data</u> For the 360° assessment: Identity data collected from reviewees: last name, first name, email address, language, nationality, data collected about the reviewees from the observers. From observers: email address and language. Statistics data (optional, collected from reviewees only): age, level of education, situation, function, sector of activity, level of managerial responsibilities. Data specific to the software: answers to 360° questionnaires. Data related to consent: consent and date when consent was provided, possible withdrawal of consent and its date. For the debriefing sessions and coaching (managers): last name, first name and email address. To safeguard the confidentiality of participants and prevent the identification of individual respondents, a minimum threshold of three (3) responses is required for a category of observers

		to be displayed in the report. This threshold applies to peers, team members, and third parties or the reviewee. Responses relating to these categories are processed exclusively in aggregated form. Where the minimum threshold is not met, the relevant category will not be displayed separately; the data will instead be incorporated into the aggregated 'Others' scores category. Under no circumstances will it be possible for a participating manager to infer or identify how an individual observer within these categories has responded. By contrast, the manager category is the only category for which a single response may be included in the report. As a result, responses within this category are not anonymised. Free-text comments provided at the end of the questionnaire are subject to a manual review by PerformanSe before being included in the report. This review aims to ensure that comments do not contain personal data enabling the identification of participants, inappropriate or offensive content. This measure is implemented in accordance with the principles of respect and dignity at work, as well as the confidential and developmental purpose of the exercise. Free-text comments are included in the report without attribution to specific observer categories.					
9.	Time limit for keeping the data	<table><tr><th>Type of data</th><th>Retention Period</th></tr><tr><td>Feedback from the observers during their participation and input in the questionnaire</td><td>2 years from the end of the year the assessment or until the reviewees requests its deletion</td></tr></table>	Type of data	Retention Period	Feedback from the observers during their participation and input in the questionnaire	2 years from the end of the year the assessment or until the reviewees requests its deletion	
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10.	Recipients of the data	The data collected will be processed exclusively by the processors. The aggregated outcome of the 360° assessment for participating managers will be accessible to managers and authorised staff in the Administration and Corporate Management Division.					
11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	N/A					
12.	General description of security measures, where possible.	The measures refer to the processors that are implementing the procedure: Hosting of personal data in France, on servers secured by a professional hosting company. ISO 27001 certification and implementation of an Information Security Management System within PerformanSe.					

		Encryption of user passwords using an algorithm compliant with state-of-the-art encryption technologies. Encryption of data at rest using an algorithm compliant with state-of-the-art encryption technologies. Partitioning of personal data between all data controllers using the software architecture of the solution. Encryption in TLS V1.2 technology of personal data when they transit between the workstation of the data subject and the hosted servers and when they transit between the workstation of the data recipient of the controller and the hosted servers. Signature of a confidentiality agreement by employees who have access to personal data for technical purposes. Annual security and intrusion audit on all platforms. Implementation of a data breach management procedure guaranteeing information to the data controller when a data breach is detected. Testing procedure for data recovery solution in less than 8 working hours. Securing of personal data stored in archives used for recovery. Double authentication for all user accounts of new clients (implemented on request for existing clients). Provision for data controllers of automatic mechanisms facilitating compliance (automatic deletion of data, choice of legal basis) and the exercise of the data subjects' rights (data deletion request link, consent withdrawal link if applicable). Logging of connections and user actions carried out on the platform in transaction journals (logs) kept on the servers for 6 months.
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the Data Protection Notice:	Details concerning the processing of your personal data are available on the Agency's website at: Data protection and privacy at EMA European Medicines Agency (EMA) and in the specific Data Protection Notice DPN-360 Assessment-Public