

6 August 2026
EMA/183538/2026

European Medicines Agency's Data Protection Notice For the 360° assessment

This Data Protection Notice explains the most essential details of the processing of personal data by the European Medicines Agency (hereinafter 'EMA' or 'Agency') in the context of the collection and categorisation of responses to questionnaires in the 360° assessment exercise for managers.

It is essential to read and retain this data protection notice, together with any other notice we may provide on specific occasions when we are collecting or using personal data about you, so that you are aware of how and why we are using such data and what your rights are under Regulation (EU) 2018/1725¹ (hereinafter 'the EUDPR').

1. Who is responsible for processing your data?

1.1. Who is the data controller?

The European Medicines Agency ('EMA') is ultimately responsible to comply with your data protection rights and freedoms. On behalf of EMA, the Head of Administration and Corporate Management Division of EMA is appointed as a 'Data Controller' to ensure the lawful conduct of this processing operation.

You may contact the Internal Controller via the following email address: datacontroller.administration@ema.europa.eu

1.2. Who are the data processors?

The Agency may engage third parties to process data on behalf of the Agency.

The contact details of the data processors are the following:

Processor	Activity	Contact Details
Julhiet Sterwen	Coaching, consulting services and 360° feedback review mechanism services	3 rue des Graviers, 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	MS 365 services and	One Microsoft Place, South County

¹ Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC, OJ L 295, 21.11.2018, pp. 39–98 (link available [here](#))



Operations Limited	applications to support EMA's administrative tasks and reporting processes	Business Park, Carmanhall and Leopardstown, D18 P521, Dublin-Ireland https://www.microsoft.com/en-us/concern/privacyrequest-msa
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2. Purpose of this data 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 Framework².

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.

2.1. *Personal data concerned*

In this processing operation we process data directly collected from you as participant (external or internal to EMA) when you submit your answers in the questionnaire, but also data collected about you as a manager (reviewee) from the people answering the questionnaire (observers). Such data may include the following:

For the 360° assessment:

Identity data collected from reviewees: last name, first name, email address, language, nationality.
From observers: email address and language.

² EMA Competency Framework (link available [here](#))

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.

2.2. Legal basis of the processing

The activity is based on Article 5(1)(d) of the EUDPR, i.e. the data subject has given consent to the processing of his or her personal data for one or more specific purposes.

EMA performs the 360° feedback reviews in accordance with Articles 24a and 110(2) of the Staff Regulations³ and Articles 11 and 81 of the Conditions of Employment of Other Servants of the European Union.

Further, the following Commission decision offers practical guidance on the implementation of the initiative:

- C(2017) 6772 final giving to decentralised agencies and joint undertakings an ex-ante agreement regarding implementing rules on learning and development⁴.

3. How long do we keep your data?

Type of data	Retention Period
Feedback from the observers during their	2 years from the end of the year the assessment or

³ Regulation No 31 (EEC), 11 (EAEC), laying down the Staff Regulations of Officials and the Conditions of Employment of Other Servants of the European Economic Community and the European Atomic Energy Community, OJ P 045 14.6.1962, p. 1385 as amended (link available [here](#))

⁴ Commission Decision of 9.10.2017 C(2017) 6772 final, giving to decentralised agencies and joint undertakings an ex ante agreement regarding implementing rules on learning and development (link available [here](#))

participation and input in the questionnaire

until the reviewee requests its deletion

4. Who has access to your information and to whom is it disclosed?

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.

5. Your data protection rights

As data subject (i.e. the individual whose personal data is processed), you have a number of rights:

- **Right to be informed** – This Data Protection Notice provides information on how EMA collects and uses your personal data. Requests for other information regarding the processing may also be directed to the Internal Controller.
- **Right to access** – You have the right to access your personal data. You have the right to request and obtain a copy of the personal data processed by EMA.
- **Right to rectification** – You have the right to obtain - without undue delay - the rectification or completion of your personal if it is incorrect or incomplete.
- **Right to withdraw consent** – You have the right to withdraw your consent to the processing of your personal data. However, this will not affect the lawfulness of any processing carried out before consent is withdrawn.

The rights of the data subject can be exercised in accordance with the provisions of EUDPR. For anything that is not specifically provided for in this Data Protection Notice, please refer to the contents of the general EMA Data Protection and Privacy Policy, hosted at [Data protection and privacy at EMA | European Medicines Agency \(EMA\)](#)

6. Recourse

In case you have any questions regarding the processing of your personal data, or you think that the processing is unlawful or it is not in compliance with this Data Protection Notice or the general EMA Data Protection and Privacy Policy, please contact:

Internal Controller at datacontroller.administration@ema.europa.eu

EMA Data Protection Officer at dataprotection@ema.europa.eu.

Address	Postal Address	EMA Switch Board
European Medicines Agency Domenico Scarlattilaan 6 1083 HS Amsterdam The Netherlands	European Medicines Agency PO Box 71010 1008 BA Amsterdam The Netherlands	+31 (0)88 781 6000

You also have the right to lodge a complaint with the **European Data Protection Supervisor (EDPS)** at any time at the following address:

- Email: edps@edps.europa.eu
- Website: www.edps.europa.eu
- Further contact information: [Contact Us | European Data Protection Supervisor](#)