

## RECORD OF PROCESSING ACTIVITY

### ASSESSMENT OF MANAGERIAL SKILLS

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

Controller: European Central Bank (ECB)

Organisational unit responsible for the processing activity: DG-HR

ECB 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*

☒ The data is processed by a third party (contractor) or the processing operation is conducted together with an external third party

Korn Ferry

Privacy statement: <https://www.kornferry.com/privacy>

#### 3. Purpose of the processing

Personal data are processed for the assessment of management skills, which aims to evaluate the managerial capabilities of candidates applying for ECB positions at management level.

The selection process for managerial roles at salary band I and above includes an assessment of leadership competencies as set out in the vacancy notice. This assessment is conducted by an external firm, Korn Ferry.

The assessment is designed to provide an insight into your competencies, traits, drivers, learning agility and risk factors. It consists of several components: an online self-assessment using the Korn Ferry Leadership assessment (psychological test); an online career history questionnaire, a behavioural interview; a self-presentation (I band only); a business case (J band and above).

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

*Whose personal data are being processed?*

- ☒ ECB staff
- ☐ Externals (agency staff, consultants, trainees or secondees)
- ☐ NCB or NCA counterparts (in the ESCB or SSM context)
- ☐ Visitors to the ECB, including conference participants and speakers
- ☐ Contractors providing goods or services
- ☐ Complainants, correspondents and enquirers
- ☐ Relatives of the data subject
- ☒ Other (please specify): External applicants who are not ECB staff.

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

(a) **General personal data:**

The personal data contains:

- ☒ Personal details (name, address etc)
- ☒ Education & Training details
- ☒ Employment details
- ☐ Financial details
- ☒ Family, lifestyle and social circumstances
- ☐ Goods or services provided
- ☐ Other (please give details):

**(b) Special categories of personal data**

Special categories of data may be processed by Korn Ferry but will not be referenced in the final assessment report that is shared with the ECB.

The personal data may reveal:

- ☒ Racial or ethnic origin
- ☒ Political opinions
- ☒ Religious or philosophical beliefs
- ☒ Trade union membership
- ☒ Genetic data, biometric data for the purpose of uniquely identifying a natural person or data concerning health
- ☒ Data regarding a natural person's sex life or sexual orientation

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

- ☒ Data subjects themselves
- ☐ Managers of data subjects
- ☒ Designated ECB staff members
- ☐ Designated NCB or NCA staff members in the ESCB or SSM context
- ☒ Other (please specify):
  - Employees of the external leadership assessment provider (Korn Ferry);
  - External observers to the selection procedure
  - External assessors serving in an advisory capacity under Article 1a.2.7.5 Staff Rules.

## 7. Transfers to/Access from third countries or an international organisation

Data are processed by third country entities:

- ☒ Yes, if the Korn Ferry helpdesk is contacted. The Korn Ferry helpdesk is 24/7 and can be contacted in case of IT issues (bugs, errors, forgotten a password, etc.). It has a “follow the sun” model globally, which means your data may be handled outside of the EU if/when you contact the Korn Ferry global help desk, dependant on the time of day and the sensitivity of the issue

Specify to which countries:

United Kingdom

Czech Republic

India

USA

Philippines

Specify under which safeguards:

☒ Adequacy Decision of the European Commission

☒ Standard Contractual Clauses

☐ Binding Corporate Rules

☐ Administrative arrangement containing enforceable and effective data subject rights

If the third country's legislation and/or practices impinge on the effectiveness of appropriate safeguards, the personal data can only be transferred to, accessed from or processed in such third country when sufficient 'supplementary measures' are taken to ensure an essentially equivalent level of protection to that guaranteed within the EEA. These supplementary measures are implemented on a case-by case basis and may be technical (such as encryption), organisational and/or contractual.

☐ No

## 8. Retention time

All reports are stored in the ECB document management system (DARWIN) and the retention period is aligned with the period of validity of the report. Confirmed leadership assessments are stored for a period of 3 years, while not confirmed reports are stored for a period of 1 year in accordance with the ECB-wide Filing and Retention Plan.

If the leadership assessment is conducted in the context of a recruitment campaign, the leadership assessment report will also be stored in the Darwin recruitment folder for that campaign for a period of 2 years in accordance with the ECB-wide Filing and Retention Plan.