



EUROPEAN COMMISSION
Executive Agency for Small and Medium-sized Enterprises (EASME)

RECORD OF PERSONAL DATA PROCESSING ACTIVITY

Based on Article 31 of the Regulation (EU) 2018/1725¹ on the protection of natural persons with regards to the processing of personal data by the Union Institutions, bodies, offices and agencies and on the free movement of such data, each responsible EASME data controller has to maintain a record of the processing activities under his/her responsibility.

Record No: R-2020-04

Initial approval by Data Controller: *see date of Ares signature*

Previous Notification (if applicable): DPO-1-2012 **Update (s) (if applicable):** 02-2018

NAME OF THE PROCESSING ACTIVITY

Exit Survey

IDENTIFICATION OF THE DATA CONTROLLER

Executive Agency for Small and Medium-sized Enterprises (EASME), Head of Unit Administration, C.2, EASME HR team

GROUND FOR THIS RECORD (*select relevant ground*)

- Record of a new type of processing activity of personal data (before its implementation)
- Record of a processing activity of personal data that is already in place (ex-post)
- Change/Amendment/ Update of an already existing previous record (or previous notification to DPO)

DESCRIPTION OF THE PROCESSING ACTIVITY

The staff exit survey assesses the Agency's working environment and identifies areas of improvement through feedback from colleagues leaving the Agency.

The survey is composed of several parts, divided in different questions.

One part relates to the factors, which influenced the decision of leaving the Agency.

The second part concerns job satisfaction, relationship with hierarchy, communication, organisation, culture and working environment at unit and agency level.

In the last part of the survey, the staff member is asked if he/she wishes to be informed about future activities of the Agency and if the person wishes to become member of the future Alumni.

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 295/39 of 21.11.2018).

1. INFORMATION ON THE PROCESSING ACTIVITY of Exit Survey

This processing activity is performed in accordance with **Regulation (EU) No 2018/1725**² on the protection of individuals with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data.

1.1. The Data Controller is:

Head of Unit C.2 Administration at the Executive Agency for Small and Medium-sized Enterprises (EASME), Place Charles Rogier 16, B-1049 Brussels and can be contacted at: easme-hr@ec.europa.eu.

1.2. The following entity(ies) is/are acting as Processor(s): n/a

1.3. The legal basis for the processing based on Article 5(1) of Regulation (EU) No 2018/1725:

- (a) the processing is necessary for the **performance of a task carried out in the public interest** or in the exercise of official authority vested in the Union Institution or body³;
- (a2) the processing is necessary for the **management and functioning** of the Union Institutions or bodies (Recital (22) of Regulation 2018/1725) ;
- (b) the processing is necessary for **compliance with a legal obligation** to which the controller is subject;
- (c) the processing is necessary for the **performance of a contract** to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- (d) the data subject has given **consent** to the processing of his or her personal data for non mandatory data as participation at the exit survey is on voluntary basis;
- (e) the processing is necessary in order to protect the **vital interests** of the data subject or of another natural person.

1.4. The purpose(s) of this processing is/are to assess the Agency's working environment and to identify areas of improvement through feedback from colleagues leaving the Agency to analyse the reason why staff is leaving the Agency.

1.5. The categories of data subjects concerned by this processing are:
statutory EASME staff (Commission officials, Temporary, contract agents, SNE)

1.6. The following personal data are collected:

First name, Last name, Age, Unit/Sector, Function and Grade, termination of employment, future position, private e-mail address. In addition "soft data" relating to the evaluation of the data subject of the working environment at the Agency might be collected.

The above-mentioned personal data are **mandatory** for the purpose(s) outline above, unless indicated otherwise in the survey.

1.7 The recipients to whom the personal data will or might be disclosed are: authorised staff of the Agency's HR sector and Agency management. Results of one specific survey of a specific person will only be shared with the competent line management upon explicit request of the person

² [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 295/39 of 21.11.2018).

³ EASME Act of Establishment: Commission Implementing Decision C(2013/771/EU) of 17 December 2013 establishing the 'Executive Agency for Small and Medium-sized Enterprises' and repealing Decisions 2004/20/EC and 2007/372/EC .

(cf question on this purpose included in the survey). Results of the survey are summarized and anonymized before dissemination to Agency management. Anonymised information will also be used to define measures for improving Agency's policies and work.

1.8. Personal data will not be transferred to third countries or international organisations.

1.9. The processing of this personal data **will not include** automated decision-making (such as profiling).

1.10. The following technical and organisational security measures are in place to safeguard the processing of this personal data:

The survey will be launched through the EU survey application. Access to data and the survey is password protected.

1.11. The personal data concerned **will be kept for a maximum period of 18 months** from the moment a survey is completed by a staff member who leaves the Agency. Data will be manually deleted at the end of this period. The personal data may be further processed for historical, statistical or scientific purposes. The further retention time for this purpose will be 4 years.

1.12. Data Subjects are informed on the processing of their personal data via a **data protection notice on their rights :**

- to access their personal data held by a controller;
- to request their personal data held by a controller to be corrected;
- to obtain in some situations erasure of their personal data held by a controller, e.g. when data are held unlawfully (right to be forgotten);
- to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- **of recourse** at any time to the **EASME Data Protection Officer** at EASME-DPO@ec.europa.eu and to the **European Data Protection Supervisor** at <https://edps.europa.eu>.

Restrictions of data subject rights to access, rectification or deletion might be applied in case of IDOC/OLAF investigations.

Request from a data subject to exercise a right will be dealt within **one month**.

Any queries concerning the processing of personal data, have to be addressed to the Data Controller indicated above in 1.1. at easme-hr@ec.europa.eu.
