

# EEAS Personal Data Processing Record

Ref. Article 31 of Regulation (EU) 2018/1725 - Legal obligation for maintaining records

1	Title of the processing activity	EEAS Management Mentoring Activity Online via the Leadership Development Platform
2	Update of the record (last modification date)	16/12/2020
3	Register reference number	2341
4	Identity and contact details of the Data Controller Joint Controller (if applicable) Data Processor (if applicable)	<p>Data Controller: European External Action Service Rond Point Schuman 9A, 1046 Brussels, Belgium Data Controller contact entity: EEAS DGBA.HR.4 Division Functional mailbox: TRAINING-HEADQUARTERS@eeas.europa.eu</p> <p>Current provider (2020): Harvard Business School Publishing Registered address: 300 North Beacon Street, Watertown, MA 02472, United States Headquarters: Harvard Business Publishing 20 Guest Street, Suite 700, Brighton, MA 02135 USA Email: customerservice@harvardbusiness.org Phone: (800) 988-0886 or (617) 783-7500 EEA Offices for users located in the European Union: Harvard Business School Publishing Europe Ltd., Vernon House, 23 Sicilian Avenue, London WC1A 2QS, United Kingdom Email: Data.Protection@harvardbusiness.org Phone: +44 (0) 20 3470 0033 Harvard Business School Publishing France SAS, 23 Rue du Roule, 75001, Paris, France Email: Data.Protection@harvardbusiness.org</p> <p>EEAS Data Protection Officer: Emese Savoia-Keleti DATA-PROTECTION@eeas.europa.eu</p>
5	Identity and contact details of the Data Protection Officer	<p>EEAS Data Protection Officer (DPO): Emese Savoia-Keleti. SG.AFFGEN.DPO Functional Mailbox of the DPO: DATA-PROTECTION@eeas.europa.eu</p>

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6	Purpose of the processing activity	<p>The purpose of the processing activity is to provide access to an online platform where EEAS managers can develop their management and leadership skills.</p> <p>In order to give the possibility to EEAS managers to develop management and leadership skills, the EEAS has contracted Harvard ManageMentor an online leadership platform based in the US.</p> <p>It is necessary to ensure optimal management of talent, motivation of colleagues to improve sustained efficiency of the functioning of the EEAS by enhancing performance of the senior and middle management and giving them assistance in developing their skills.</p> <p>Making available a mentoring online platform for managerial capacity building “Online leadership development platform” is a service that the EEAS offers to managers, who voluntarily take up the opportunity to improve their skills.</p> <p>It is confirmed by the data controller that “Harvard ManageMentor” is not a compulsory training element, and managers are not obliged to take part.</p>
7	Legal basis and lawfulness	<p>Processing is necessary for the functioning and management of the EEAS [Article 5(1)(a) of Regulation (EU) 2018/1725]. Managers request to have access to the platform and thus for accessing the platform they agree to use HarvardManageMentor.</p> <p>Legal references:</p> <ul style="list-style-type: none"> <li>- Implementation of the “strategic Learning and Development framework”: <a href="https://intranet.eeas.europa.eu/system/files/Block_type_2_documents/Learning_and_Development_Framework_LEAD_EEAS_LAYOUT.pdf">https://intranet.eeas.europa.eu/system/files/Block_type_2_documents/Learning_and_Development_Framework_LEAD_EEAS_LAYOUT.pdf</a></li> <li>- Article 24(a) of the Staff Regulations on further training and instruction.</li> </ul> <p>Further legal reference: Council Decision of 26 July 2010 establishing the organisation and functioning of the EEAS (2010/427/EU)—OJ L 201, 3/8/2010, p. 30.</p>
8	Categories of individuals whose data is processed - Data subjects	EEAS management staff
9	Categories of data - Data processed	<ul style="list-style-type: none"> <li>- Name</li> <li>- Contact details</li> <li>- Username</li> <li>- Password</li> <li>- Nationality</li> <li>- Gender</li> <li>-Statutory link</li> <li>- Entity</li> <li>- Job function</li> <li>- Location</li> </ul>
10	Recipients of data – Access to data	Access to the personal data is provided to EEAS assigned staff responsible for organising, managing and following up the management mentoring activity. Such staff abide by statutory, and when required, additional confidentiality agreements.

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11	Transfer to Third Countries or International Organizations (IOs) and suitable safeguards (if applicable)	<p>The processor is seated in the U.S. with affiliates in the UK and France.</p> <p>The contract with Harvard Business Publishing for the Harvard ManageMentor was prepared before the Schrems II EUCJ judgement. It is part of a framework contract within which a licence was purchased at the end of the 2018. Harvard Business Publishing uses the Standard Contractual Clauses of the Commission (EC 2010 model) for transfers of data from the EEA.</p> <p>Privacy Policy: <a href="https://hbsp.harvard.edu/privacy-policy">https://hbsp.harvard.edu/privacy-policy</a></p> <p>Privacy policy – section on international transfers for EU users:</p> <p>HBP is a global business and we, or our service providers, may process, transfer, and store information about our users on servers located in a number of countries, including the United States and the European Economic Area (EEA). Since we are committed to protecting your information, we take steps to ensure that there are appropriate safeguards in place when we transfer that data. For data transferred from the EEA to HBP or its service providers outside the EEA, HBP relies on the EU Model Clauses (issued by the European Commission) to provide an adequate level of protection. To request a copy of these EU Model Clauses contact us as provided below.</p> <p>Except when necessary for the processing above, personal data is not intended to be transferred to a third country or an international organisation.</p>
12	Time limit for keeping the data - Retention period	<p>HR.4 only keeps personal data for the time necessary to fulfil the purpose of collection and processing for the mentoring activity. The Data shall be kept on the platform as long as the account is active and after that, Harvard Mentoring will keep the personal information for a reasonable period of time enabling to handle or respond to any complaints, queries or concerns relating to the account.</p>
13	Data Storage	<p>The collected personal data are stored on servers that abide by pertinent security rules</p>
14	General description of security measures	<p>Appropriate organisational and technical measures are ensured according to Article 33 of Reg. (EU) 2018/1725. The collected personal data are stored on servers that abide by pertinent security rules. Storage of data is only on folders with restricted access. Physical copies of personal data, if created, are stored in a properly secured manner. Measures are provided to prevent unauthorised entities from access, alteration, deletion, disclosure of data. Data is processed by assigned staff members. Access to specific files requires authorisation. General access to personal data is only possible to recipients with a UserID/Password.</p> <p>Details on the security of data by the service provider:</p> <p>BP maintains appropriate physical, technical and administrative security to help prevent the loss, misuse, unauthorized access, disclosure or modification of personal information.</p> <p>While we take these steps to protect your personal information as much as we reasonably can, no system or transmission of data over the Internet or any other public network, or any storage of data, can be guaranteed to be 100% secure.</p>
15	Rights of individuals	<p>Data Subjects have the right of access to their personal data and the right to correct your inaccurate, or incomplete personal data taking into account the purpose of the processing. The right of rectification can only apply to factual data processed. Under certain conditions, data subjects have the right to ask the deletion of their personal data or restrict their use as well as to object at any time to the processing of their personal data on grounds relating to their particular situation. The EEAS considers the request of individuals, take a decision and communicate it to the data subjects without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary. For more detailed legal references, Articles 14 to 21, 23 and 24 of Regulation (EU) 2018/1725 are indicated to the data subjects as further information. In specific cases, restrictions under Article 25 of the Regulation may apply. If data subjects wish to exercise their rights or have questions concerning the processing of their personal data, they may address them to the Data Controller via the functional mailbox: <a href="mailto:TRAINING-HEADQUARTERS@eeas.europa.eu">TRAINING-HEADQUARTERS@eeas.europa.eu</a></p>

16	Information to data subjects	Information is available on the platform.
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