

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 Mentoring Activity (Headquarters and EU Delegations)
2	Update of the record (last modification date)	16/12/2020
3	Register reference number	2701
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 DGBAHR.4 Division Functional mailbox: TRAINING-HEADQUARTERS@eeas.europa.eu</p> <p>Processor: (current provider at year 2020) MentorcliQ, Inc. 595 S. Third Street, 2nd Floor Columbus, OH 43215, USA</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>
6	Purpose of the processing activity	<p>The purpose of the processing activity is to ensure the organisation and design of mentoring programs, match participants, train mentors/mentees, evaluate the matching and the mentoring experience as well as the milestones and goals. Reporting allows the administrators of the programme to measure the result of mentoring programs and to evaluate the satisfaction with the mentoring and with the mentor-mentee relationship.</p> <p>Mentoring is a process by which an experienced colleague mentors a newcomer or another colleague, supporting him / her in her development, passing on organisational knowledge and enhancing an esprit de corps. A main condition for a successful mentoring programme is the right matching between the mentor and his skills and experience and the mentee with his/her aspirations.</p> <p>MentorcliQ software helps on the organization and design of mentoring programs, match participants, train mentors/mentees, evaluate the matching and the mentoring experience as well as the milestones and goals. Reporting allows the administrators of the programme to measure the result of mentoring programs and to evaluate satisfaction with the mentoring experience and with the mentor-mentee relationship.</p> <p>Description: In order to optimize the mentoring experience the MentorcliQ Mentoring Platform, a US based service provider subcontracted by the EEAS Career, Learning and Development Division (BA.HR.4) gathers information during the registration process via the Platform. This is necessary to assign a mentor as well as to play the role of mentee.</p> <p>The processing of data relates to categories of information we may collect including contact details (such as name, email address), professional information (such as job title, job function), mentoring preferences, demographic data.</p>

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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].</p> <p>Lawfulness for the processing of a profile picture, data captured during the choices into a short optional visual questionnaire, optional demographic data as well as any information the participants in the mentoring programme (users of the platform) voluntarily contribute to the MentorcliQ Help Center forums is consent. The user has to acknowledge having read the information about how the data are processed, including the information about uploading a photo and filling in the visual questionnaire. When the user uploads the photo or answers the questionnaire, the consent will be registered. A separate privacy policy is available about the help forums (https://www.mentorcliq.com/privacy-policy).</p> <p>Legal references:</p> <ul style="list-style-type: none"> - Implementation Roadmap by the Task Forces Career Development and Gender and Equal Opportunities (28 June 2017 Report to the Secretary General) Intranet Reference: https://intranet.eeas.europa.eu/page/eeas-work/equal-opportunities-and-career-development/history - Article 24(a) of the Staff Regulations on further training and instruction. <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 staff (including officials, temporary agents, contract agents)
9	Categories of data - Data processed	<ul style="list-style-type: none"> - Name - Contact details - Job title - Location - Time zone - Entity (Directorate and Division) - Function group - Year joined EEAS - Language - Gender - Your list of competences (as individuated by you on the profile) - Profile picture (optional) - The responses to the visual questionnaire (optional, only the responses are stored, no analysis or conclusions are drawn) - Information provided to the help forums (optional) - Other data which help to find the right mentor (optional)
10	Recipients of data – Access to data	<p>Access to the personal data is provided to EEAS assigned staff responsible for organising, managing and following up the mentoring programme</p> <p>and the prospective and actual mentors/mentees according to the “need to know” principle. Such staff abide by statutory, and when required, additional confidentiality agreements.</p>

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11	Transfer to Third Countries or International Organizations (IOs) and suitable safeguards (if applicable)	<p>The current processor (2020: MentorcliQ) is seated in the U.S. and may store data in the cloud on U.S. servers. The processor and all U.S. based sub-processors were registered under the Privacy Shield and signed appropriate contractual clauses for the protection of personal data.</p> <p>To be noted, the contract with MentorcliQ was prepared before the Schrems II EUCJ judgement and included the provision that data should only be transferred to the U.S. to processors and subprocessors registered to the Privacy Shield. At the same time, the processor signed the Commission Standard Contractual Clauses and has to transfer all duties and tasks under these clauses to any subprocessors outside the EEA.</p> <p>Due to invalidation of the Privacy Shield as consequence of the Schrems II judgement the EEAS has duly modified the contract with the necessary amendment. (Modification sent to processor on 12 August 2020) It has been strengthened vis-a-vis the processor that the EEAS only accepts subprocessors who undertake the same data protection obligations as the contracted party (processor), i.e. MentorcliQ.</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	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 up to a maximum of 3 years from the date of recording.
13	Data Storage	Storage is implemented on an online platform. Data storage is only on folders with restricted access. Personal data processing is implemented primarily by electronic means.
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.</p> <p>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>MentorcliQ maintains physical, electronic and administrative safeguards to protect personal information from loss, misuse and unauthorized access, disclosure, alteration and destruction. MentorcliQ will take all reasonable steps to protect information in storage.</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:</p> <p>TRAINING-HEADQUARTERS@eeas.europa.eu</p>
16	Information to data subjects	Information is provided to the Data Subjects related to this Record in the Privacy Statement. The Privacy Statement or Data Protection Notice is accessible on the intranet of the EEAS and on the platform.

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