

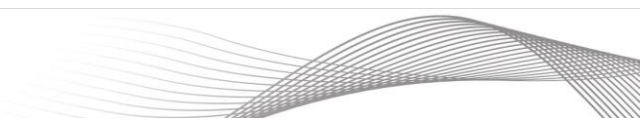
EDPS record of processing activity

Record of EDPS activities processing personal data, based on Article 31 of 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.

| Nr. | Item | Description |
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| | | Exit interviews |
| 1. | Last update of this record | 12.09.2022 |
| 2. | Reference number | 61 |
| 3. | Name and contact details of controller | European Data Protection Supervisor (EDPS) Postal address: Rue Wiertz 60, B-1047 Brussels Office address: Rue Montoyer 30, B-1000 Brussels Telephone: +32 2 283 19 00 Email: edps@edps.europa.eu Responsible department or role: EDPS HRBA Unit - edps-selections@edps.europa.eu . Contact form for enquiries on processing of personal data to be preferably used: https://edps.europa.eu/node/759 |
| 4. | Name and contact details of DPO | dpo@edps.europa.eu |
| 5. | Name and contact details of joint controller (where applicable) | Not applicable. |
| 6. | Name and contact details of processor (where applicable) | Not applicable. |



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| 7. | Short description and purpose of the processing | <p>The overall purpose of the processing is to get feedback on departing colleagues' working experience in the institution through exit interviews, and receive information concerning: (i) better understanding of turnover; (ii) reasoning and concerns of departing staff; (iii) staff satisfaction and management issues.</p> <p>Participation in exit interviews by departing staff members will be encouraged by the HRBA Head of Unit (HoU) but is not mandatory. Interviews are carried out on a voluntary basis by the HRBA HoU. In case the HRBA Head of Unit is not available or the departing staff member so prefers, the interviews can also be carried out by the Head of the HR Sector or by the HR Officer in charge of wellbeing in replacement of the HRBA HoU. In all cases, the HRBA Head of Unit will have access to the outcome of the exit interview afterwards.</p> <p>All exit interviews follow the same structure and will be conducted in a structured way, based on a standardised questionnaire ("form"), either orally or in writing. The form aims at verifying whether the interviewer covers the most important topics; documenting employer strengths, weaknesses and areas of opportunity; and creating a plan for future improvements.</p> <p>Oral discussion is the preferred means, but an electronic form will also be offered as an alternative to a face-to-face meeting.</p> <p>The data will be accessed only by the HRBA HoU and the person conducting the interview (if different). The HRBA HoU can decide whether to report to the Director on important outcomes or trends having a particular impact on the HR management. The report will be presenting data in aggregated form and in any case in a way that will limit the risk of possible re-identification of the data subject.</p> <p>The data and information gathered during the exit interviews shall be analysed, every 18 months, in a generalised report for senior management. The generalised report will not mention individual examples and will serve as a basis of further development of HR practices and policies (e.g., by reporting any behaviour that could damage the unit/the institution or the organisational reasons behind a decision to leave the institution).</p> |



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| | | <p>In addition, the HRBA HoU may process eventual feedbacks given by the departing staff member to the Member of the Staff Committee appointed to this role or his/her managers, which the latter may decide to share with the HRBA HoU upon the departing colleague's consent. Should this occur, the HRBA HoU will treat the information as confidential and only use it to improve current processes and/or practices (while not exposing the departing colleague).</p> |
| 8. | Description of categories of persons whose data the EDPS processes and list of data categories | <p>Exit interviews at the EDPS will be conducted with departing staff of the following categories: officials, temporary agents, contract agents and seconded national experts. Interviews will be held for the following types of departures:</p> <ul style="list-style-type: none"> • Mobility to another EU Institution/Agency/Body; • End of contract/end of secondment/resignation; • Temporary departures (i.e. secondments, leave on personal grounds and other temporary departures for a period longer than 6 months). • Retirement <p>The HRBA HoU collects the following categories of personal data for the purpose of this processing:</p> <ul style="list-style-type: none"> - Identification data of the staff member leaving the EDPS, including his/her full name, personnel number, previous grade and function. - Recruitment and contractual data: dates of start and end of the contracts, desired end of contract (i.e. in case of resignation), reasons for leaving (not compulsory), new destination of the staff member who moves to another EU institution or body or to another Member State, or to private business. - In case of potential conflict of interest: information on the future occupational activity that the staff member will take up, the expected starting date, employment duration and the position in the entity, whether the staff member will be an employee and /or shareholder in the entity and which pecuniary advantages s/he will receive, whether the entity has any (in)direct commercial, financial or contractual links with an EU institution/Agency/Body, whether the data subject |



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| | | during his/her employment at the EDPS had relations with the entity for which s/he intends to engage. |
| 9. | Time limit for keeping the data | <p>The paper or electronic documents drafted during or after the exit interviews, which are filed and kept a dedicated folder by the HRBA team, are kept for 6 months as of the date of the interview. After this period, the personal data processed will be destroyed.</p> <p>HRBA has interest in keeping part of the information shared during the exit interview, deprived from any reference to the interviewee's personal data or to other information that may lead to identifying the interviewees, also for a longer period (e.g. to identify possible specific trends or issues relating to staff departure). To do so a matrix on clusters of feedbacks (e.g. excessive work, weak relationship with management or colleagues, lacks of flexibility, etc.) will be created before the destruction of personal data collected during interviews</p> |
| 10. | Recipients of the data | The only persons that can access the data on behalf of the EDPS are the HRBA HoU and, in case the departing staff member so selects or the HRBA HoU is not available, the Head of the HR Sector or the HR Officer in charge of wellbeing conducting the interview. |
| 11. | Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards? | Not applicable. |
| 12. | General description of security measures, where possible. | <p>- Electronic file: The electronic forms are kept in the secured drive of the person responsible for the conduction of the interview and are erased, in accordance to the retention period, after creation of the relevant matrix/report on clusters of feedbacks.</p> <p>- Paper file: The paper forms are stored in a cupboard in a locked office to which only the person responsible for the conduction of the interview has access and are erased, in accordance to the retention period, after creation of the relevant matrix/report on clusters of feedbacks.</p> |
| 13. | For more information, including how to exercise your rights to access, | Data protection notice available internally. |



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| | rectification, object and data portability (where applicable), see the data protection notice: | |