



## RECORD OF PROCESSING OPERATION ON

### Monitor and Improve wellbeing at the workplace

PART 1 – Article 31 Record (Publicly accessible)		
1.1	Reference number	DP.HR.22.01
1.2	Type of data	<p>Base data is the personal data that EEA provides to Worklife Barometer ApS.</p> <p>Transactional data are all the responses provided by individual staff members when completing the Howdy App survey questions.</p>
1.3	Data controller	
1.3.1	Name and contact of Controller of transactional data	Worklife Barometer ApS, contact person: Gunnar Braband, <a href="mailto:gbr@howdy.care">gbr@howdy.care</a>
1.3.2	Name and contact details of controller of base data	<p>Head of Group Human Resource Management (HRM)</p> <p><a href="mailto:personnel@eea.europa.eu">personnel@eea.europa.eu</a></p>
1.4	Processor	
1.4.1	Name and contact details of the processor of the base data (where applicable)	Worklife Barometer ApS, contact person: Gunnar Braband, <a href="mailto:gbr@howdy.care">gbr@howdy.care</a>
1.4.2	Name and contact details of the processor of the transactional data	<p>Processor of transactional data is Worklife Barometer ApS.</p> <p>Contact details:            Worklife Barometer ApS            Njalsgade 76,            2300 Copenhagen S            Phone no.: +45 888 777 00            Email: <a href="mailto:gdpr@howdy.care">gdpr@howdy.care</a>            Website: <a href="http://www.howdy.care">www.howdy.care</a></p>
1.5	Name and contact details of the DPO	<a href="mailto:DPO@eea.europa.eu">DPO@eea.europa.eu</a>
1.6	Purpose of the processing	As part of the wider well@work campaign, one element is to introduce ways to monitor one's own status of wellbeing as well as allow at organisational level to measure wellbeing at work. The purpose is to foster wellbeing at all levels of the organisation, to enable conversations at group/programme level based on data rather than subjective information and to prevent work-related stress. Overall aim is to

	<p>create a common understanding of health and wellbeing at work. In this regard, the EEA provides Worklife Barometer Aps with necessary personal data ('base data') to allow the monitoring of wellbeing at an aggregated level to the organisation. At an individual level, this offer is voluntary and allows to continuously track one's own wellbeing and hopefully detect signs of stress earlier or to get direct help from the Falck response team (i.e. the EEA medical advisor), should the wellbeing level drop significantly.</p> <p>The individual will give its consent upon registering with the Howdy application.</p> <p>At any time of the process the individual is in control of what info is reported.</p> <p><b>Process at individual level:</b></p> <p>Personal email invitation to join the app.</p> <p>Every 2 weeks 5 questions to answer in the app. Feedback through app on wellbeing score and trend. Should the results fall in the red zone (based on WHO standard) the Falck response team contacts the individual by phone/email for a 20min consultation, joint agreement between individual and consultant under what category of reason to open a case. Possible follow-up call.</p> <p>When results are in yellow zone the individual has the option to be contacted by the response team for a consultation.</p> <p>No contact with response team if results are in the green zone.</p> <p><b>At organisation level:</b></p> <p>At the beginning of the month Heads of Group (HoG) and Heads of Programme (HoP) can access through Howdy portal the respective report with aggregated data, provided that anonymity safeguards are respected.</p> <ul style="list-style-type: none"> <li>- Anonymity safeguard 1: a minimum of 5 responses per group (unit) must be recorded to provide any statistics. If less than 5 responses, reporting will roll-up to next hierarchical level.</li> </ul> <p>HoG/HoP/HRM can see status of the team, including the number of red cases, but no personal data.</p> <ul style="list-style-type: none"> <li>- Anonymity safeguard 2: a minimum of 10 responses per group must be recorded by the Falck response team to generate reasons why</li> </ul>
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		<p>these cases are in the red zone in the report to HoG/HoP/HRM.</p> <p>An individual jointly decides with health consultant whether the reasons discussed with the response team should be recorded.</p> <p>The Howdy portal provides guidance for conversations at team level and other helpful information around wellbeing and ways to improve.</p> <p>HR supports managers through advice, referral to stress counselling within EEA, coaching opportunities, training and learning opportunities at group level.</p>
1.7	<b>Description of categories of persons whose data the EEA processes and list of data categories</b>	<p>Categories of persons: EEA statutory staff and SNEs.</p> <p>Categories of data:</p> <ul style="list-style-type: none"> <li>- Base data: name, email, programme, group, manager or non-manager.</li> <li>- Transactional data: individual replies to the bi-weekly questions in the app and potential follow-up actions (consultation and joint agreement to open a case).</li> </ul> <p>The base data are the minimum required categories to make the application fulfil its purpose.</p>
1.8	<b>Time limit for keeping the data</b>	<p>Personal data is deleted when:</p> <ul style="list-style-type: none"> <li>- the relationship between EEA and Worklife Barometer ApS has ended; or when</li> <li>- an individual leaves the EEA (whichever comes first); or when</li> <li>- the individual withdraws consent.</li> </ul> <p>When data subjects withdraw their consent, Worklife Barometer ApS anonymises their answers and cases, so they cannot be traced back to them, but can be used for statistical purpose. Worklife Barometer ApS deletes the case notes (through their interactions with the Falck Response team) though.</p> <p>Error log entries are deleted 6 months after being created.</p> <p>Security log entries are deleted 12 months after being created.</p> <p>Technical support cases, i.e. cases where a EEA staff contacts Worklife Barometer ApS for technical assistance with the app or to update information, are deleted 12 months after being closed.</p>
1.9	<b>Recipients of the data</b>	<p>Base data will be shared with the following recipients:</p>

		<ul style="list-style-type: none"> <li>- HRM group staff members responsible for the processing operation</li> <li>- Worklife Barometer ApS</li> </ul> <p>Transactional data will be shared with the following recipients:</p> <ul style="list-style-type: none"> <li>- Falck response team, acting as processor for Worklife Barometer ApS, only when there is an ongoing case with a staff member. Falck will need to identify the case through a personal identifier to conduct the 20min consultation. Once the case is closed, no one can see the data.</li> <li>- Worklife Barometer ApS is providing Falck with the technical solution, e.g. servers and both have a data controller agreement in place.</li> <li>- EEA managers and HRM contact person will only have access to the aggregated transactional data (a minimum of 5 answers per group are required to ensure anonymity).</li> </ul> <p>Worklife Barometer ApS uses data processors (technical platform administrators) to store and process personal data on their behalf and in accordance with Worklife Barometer ApS's privacy policy (see attached) and applicable legislation. These data processors all act in accordance with the instructions received from Worklife Barometer ApS.</p>
<p><b>1.10</b></p>	<p><b>Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?</b></p>	<p>Howdy is hosted on servers located within the EU/EEA and thus personal data is generally processed within EU/EEA. No transactional data is transferred to third countries or international organisations.</p> <p>However, technical logs, reminder messages and/or technical error data related to base data may be transferred to third countries. In such a case Worklife Barometer ApS ensures that appropriate technical and organisational safeguards are in place, such as the standard contractual clauses as adopted and published by the EC.</p> <p>Data subjects have the right to obtain a copy of these clauses and safeguards.</p>
<p><b>1.11</b></p>	<p><b>General description of security measures</b></p>	<p>Worklife Barometer ApS does its own risk assessment and mitigating organisational and security measures. These are audited yearly as part of Worklife Barometer ApS's ISAE3000 audit statement.</p>

<p><b>1.12</b></p>	<p><b>Measures for providing additional information, including how data subjects may exercise their rights of access, rectification, data portability (where applicable), etc.</b></p>	<p>EEA staff has been briefed on Howdy during the <a href="#">kick-off meeting</a> and a separate info session will be organised for the launch of Howdy.</p> <p>With regard to base data, data subjects may exercise their rights by contacting the data controller by email at <a href="mailto:personnel@eea.europa.eu">personnel@eea.europa.eu</a>.</p> <p>With regard to transactional data, data subjects can exercise their data protection rights granted by contacting Worklife Barometer ApS at <a href="mailto:gdpr@howdy.care">gdpr@howdy.care</a></p> <p>Ph +45 888 777 00</p> <p><a href="http://www.howdy.care">www.howdy.care</a></p> <p>Additional information on the processing information may be obtained in the controller's privacy policy, as well as in the End user consent form attached to the app.</p> <p>If a user withdraws from the Howdy app, it will be processed as soon as possible.</p>
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