

## DATA PROTECTION NOTICE

### *CMS 2.2 - Change Management Interviews*

As Eurojust collects and further processes personal data, it is subject to *Regulation (EU) 2018/1725 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* ('the Regulation').

The following information is provided as per Article 15 of the Regulation.

#### **1. Context of the processing activity and Controller**

In the context of the new Case management system project as part of the organizational change management efforts, the contractor (Business Elements (BE)) will conduct interviews with Eurojust staff members following an ADKAR (Awareness, Desire, Knowledge, Ability, Reinforcement) assessment. These interviews are designed to gather qualitative insights to support and guide the change process, ensuring that any interventions are effectively aligned with individual and team readiness. The data collected during these interviews may include personal opinions, experiences, and perceptions relevant to the change initiative.

The Head of DMU is the data controller and can be contacted via the following email address: [dcj@eurojust.europa.eu](mailto:dcj@eurojust.europa.eu). The contractor BE is the data processor and will be processing personal data according to the contract "**Services related to Microsoft products for the new Content Management System CMS- Phase 2.2.**". The contact information of BE is the following: **Insight Technology Solutions Belgium Inc, Belgian branch of Insight Direct USA Inc, Romeinsesteenweg 468, 1853 Grimbergen, Belgium, VAT registration number BE 0464.228.241.**

#### **2. What personal information do we collect, for what purpose, under which legal bases and through which technical means?**

##### ***Purpose of the processing***

The purpose of processing personal data through these interviews is to support the effective implementation of organizational change initiatives by assessing individual and group readiness across the ADKAR model dimensions. The insights gathered help identify barriers, measure progress, and tailor communication and support strategies to ensure successful adoption and sustainability of change. This processing enables evidence-based decision-making and targeted interventions to facilitate smooth transitions within the organization.

EU Survey ( [EUSurvey - Data Processing Agreement](#) and [EUSurvey - Terms of Service](#) ) will be used with the anonymous module enabled to ensure user contributions remain anonymous. In this setup, EU Survey will not record IP addresses, and survey creators or authors will have no way to identify individual respondents. However, to deliver its services, the EU Survey platform will collect certain technical information, such as traffic statistics and analytics. The use of a personal or professional device to fulfil the surveys will be entirely optional, and users will be encouraged to consult the EU Survey Privacy Statement (<https://ec.europa.eu/eusurvey/home/privacystatement>) for more detailed information.

### ***Types of personal data***

Personal data collected and processed during Change Management activities will strictly follow the data minimization principle, aiming to collect the strictly necessary information. In this respect, the data processed of the targeted group of Eurojust staff members/postholders from the National Desks/relevant administrative units/offices (having experience in using the Case Management System) may involve the following personal data: email address, name, surname and personal data (e.g. opinions/views) *stemming from the answers to the open questions of the interview.*

### ***Legal basis***

The legal basis for the processing activities is Article 5(1)(a) of Regulation (EU) 2018/1725, more specifically Article 23(1) of Regulation (EU) 2018/1727.

### ***Technical means***

All communications will be done via email and the interviews will be conducted in person and via EU Survey. There will be no audio or video recording of the interviews. In addition, the results of the interview will be stored in Eurojust's secure Document Management System (DMS) within a restricted folder.

### **3. Who has access to your personal data and to whom is it disclosed?**

The data provided by the data subjects during the interviews will be accessible by the contractor (BE) as Data Processor as well as by Eurojust authorised staff members directly involved in the new CMS project. The access will be granted on the need to know basis.

The results of the interviews as well as any outcome (in both cases aggregated data) will be presented to the management team.

### **4. How do we protect and safeguard your information?**

All IT tools at Eurojust are developed according to a standard set of security and are thoroughly tested accordingly, to ensure robustness and reliability.

### **5. How can you verify, modify or delete your information?**

You have the right to access your personal data and to relevant information concerning how we use your personal data. You have the right to request rectification of your personal data. You have the right to ask that we delete your personal data or restrict its use. Where applicable, you have the right to object to our processing of your personal data, on grounds relating to your particular situation. Where applicable, you have the right to your data portability. We will consider your request, take a decision, and communicate it to you. For more information, please see Articles 14 to 21, 23 and 24 of Regulation (EU) 2018/1725. Please note that in some cases restrictions under Article 25 of Regulation (EU) 2018/1725 may apply (see College Decision 2020-04 of 15 July 2020 on internal rules concerning restrictions of certain data subjects' rights in relation to the processing of personal data in the framework of activities carried out by Eurojust, available in the Eurojust website [here](#)).

To exercise your rights, please contact [dcj@eurojust.europa.eu](mailto:dcj@eurojust.europa.eu)



**EUROJUST**

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## **6. How long do we keep your personal data?**

Survey responses will only be retained from the moment it is collected from the data subjects via the distributed form, in-person interviews or EU Survey for no longer than 5 years in order for Eurojust to be able to analyse the data, and prepare the aggregated results as well as change management plans in the context of the new CMS project. After such a period, the stored data that had previously been collected is erased both from Eurojust and the contractor systems.

## **7. Contact information**

In case of queries regarding the processing of personal data you may also contact the Data Protection Officer of the Eurojust ([dpo@eurojust.europa.eu](mailto:dpo@eurojust.europa.eu)).

## **8. Recourse**

You have the right to lodge a complaint to the European Data Protection Supervisor via the email [edps@edps.europa.eu](mailto:edps@edps.europa.eu) or [https://edps.europa.eu/data-protection/our-role-supervisor/complaints\\_en](https://edps.europa.eu/data-protection/our-role-supervisor/complaints_en) if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data.