

**for customers, candidates and assessment participants:
Data Protection and Information Security Policy of Informed Assessment
Ltd v4 18 FEB 2018**

Introduction

This document has been designed to assist your understanding of the generic data protection and information security policy of Informed Assessment Ltd.

For what purposes do we process information?

Informed Assessment Ltd of MBL House, 16 Edward Court, Altrincham Business Park, George Richards Way, Altrincham, Cheshire WA14 5GL is a data processor acting only in response to the instructions of its customers, who act as data controllers when seeking the assessment of candidates or participants for the purposes of recruitment, personal or team development. We also engage assessment exercise publishers who act as data sub-processors when providing the assessments and platforms which we use under licence.

Our customers may be a training provider, careers coach, HR services provider, employer or potential employer, or very occasionally a personal customer engaging us to support their personal development.

How is permission obtained and by whom?

As Informed Assessment acts as a data processor, our approach is based on the principle that informed consent has been gained by the customer from the candidate or participant on whom the assessment is sought.

What information do we process?

All of the candidate, participant and customer information provided to us will be treated in accordance with this Privacy Policy, and other relevant UK Acts and regulations currently in force.

About customers

We act as a data controller for customer information only to support the delivery of our business services, primarily for invoicing purposes. We invoice customers using contact information, telephone numbers, postal addresses and email addresses. The vast majority of our customers are corporate, not personal users, and we do not hold any credit card or other sensitive financial information.

About candidates and participants

We process information about candidates and participants which is necessary for the purposes of the provision of psychometric and related assessment and

reporting services. The sale and provision of these services is governed by our standard terms and conditions.

How do we receive this information?

From customers

Customers may request an assessment through email or telephone. Orders are confirmed by email, and accompanied by Terms & Conditions if a new customer or whenever these are updated.

Customers may request information through an Enquiry Form on our website. If so, the information given to us when using our website may include the customer's name, phone number, email address, and, only if using the office location finder facility and postcode.

With regards to visits to our website, we may in future automatically collect technical, traffic and usage data.

If a customer contacts us, we may keep a record of that correspondence.

From candidates or participants

Candidates or participants may provide personal information to us when they participate in an assessment organised by a customer. This could be through:

- Giving us information directly by corresponding with us if they have any queries about an assessment, are reporting a problem, or are requesting feedback or are sending an email to us
- Giving us information indirectly by completing one of the assessments of our sub-processors.

If a candidate contacts us, we may keep a record of that correspondence.

What type of information do we receive?

From customers

Customers may provide personal information about candidates in relation to assessments in which they would like them to participate. This typically includes name, email address, telephone number and other contact information.

In addition, our customers may occasionally provide us with:

- Employer-provided data – this may include resume information or a CV, for the specific purpose of identifying relevant or appropriate assessments.

From candidates or participants

Our customers, or we, may also ask candidates if they have any adjustment requirements. Our customers, or we, may request certification of any conditions so that we can best respond to candidate needs and so that our customers can also make any necessary arrangements for any onsite assessment process.

Candidates or participants may take part in assessments through the online platforms of our assessment sub-processors, or in a paper-and-pencil format at an assessment event.

When they participate in assessments through our sub-processors, they are an independent user of their systems and are filling in their own information.

They can find out about how they use their data through their own privacy policies which will be made available to them when logging in / registering and / or before being asked to complete any assessments.

When they complete an assessment with one of our sub-processors, their responses may constitute personal data. We categorise such data as follows:

- Candidate Identification data – such as name, email address and other contact details
- Assessment data – which means responses in assessments, which may include motives, talents, aptitudes, competencies, interests and observed behaviour in structured work-sample or other similar simulated assessments
- Research data – which means responses to gender, age, cultural background, qualifications, work experience or details regarding work-related responsibilities or periods of employment.

Identification Data needs to be provided to help Informed Assessment coordinate assessments, and for the assessment sub-processors to administer the assessments.

Research Data may include sensitive personal data (as defined in the UK Act or other current and relevant legislation or regulations). Research Data does not form part of the assessment and is only used for research purposes in appropriately aggregated and anonymised forms by the assessment sub-processors so that they can monitor their tests and questionnaires for fairness and maintain a high standard of assessment.

When an assessment sub-processor asks a candidate or participant to provide Research Data, they will be asked for explicit consent to collect and process such information in a data protection notice and further information is provided at the point at which such information may be provided by them. They have the opportunity to refuse or omit such Research Data. Their ability to complete an

assessment will not be affected by their choice not to provide such research data, and nor will this choice affect their assessment results.

Informed Assessment does not initiate the processing of Research Data for research purposes, though our assessment sub-processors will analyse and assess areas such as gender, race and cultural background over the longer term in aggregated or anonymised forms. This is considered best practice and allows for assessments to be monitored for fairness in use.

From website users

A cookie is a small bit of information that is sent to the user's computer and is stored on its hard drive. Our website uses cookies to distinguish between users of our website. This helps to provide a better user experience when using our website.

Withdrawal of permission by a candidate or a participant previously supplied on the basis of informed consent

Candidates and participants are under no obligation to begin or to complete assessments in these circumstances. They are reminded of this on our briefing emails. They need not accept an invitation to complete an assessment, or they can click-out of a partially-completed assessment at any time.

If they do not wish to begin or to complete assessments, we ask them to advise both their contact point in the sponsoring organisation and Informed Assessment.

How do we process information?

From customers

We will use information given to us in the course of providing services to a corporate or a personal customer for the following reasons:

- To carry out our service obligations and to bill for products and services provided
- To provide information about further assessment services that are similar to those which have been already purchased or enquired about
- To notify of changes to our services.

Personal information provided in relation to visits to our website may be used to better understand our website usage and to improve our website.

From candidates or participants participating in an assessment

We process Candidate Identification Data and Assessment Data provided in relation to participation in assessments (online or face-to-face if we are attending or supporting assessment or development centres) for the purposes of providing services to our customers.

This may include processing this Assessment Data in order to:

- Assess aptitudes, motives, competencies, strengths or preferred working styles
- Produce assessment reports for our customers who have requested that this assessment be made available on or about candidates or participants.

Customers are entitled to use the personal information that we provide to them as part of our services for their own purposes.

The assessment reports and services which we provide to our customers may be used by them for purposes which may include the selection and development of individuals in an employment or human resources context.

Candidate Assessment Data will not be shared by Informed Assessment with other customers / customers who did not sponsor the original assessment.

We may also provide copies of Assessment Data to our customers, subject to licensing conditions, for use by their own internal human resource departments or line managers. However, such customers are obliged to process such personal information in accordance with their own obligations under the UK Act, other data protection laws and other current regulations (as applicable) and our own terms and conditions. Candidates and participants have rights with respect to the manner in which our customers process such personal information provided to them by us.

Our assessment sub-processors may also process candidate or participant personal information for the purposes of using and refining their assessment tools.

How do we use information?

About customers

We do not engage in indiscriminate email or postal mailshots. However, we may occasionally contact customers or potential customers of our services if they have provided us with contact details, or if we have important organisational information to share with them about Informed Assessment.

If customers do not wish to receive any marketing communications from us, which would only ever be occasionally sent by us, though, they can let us know at any time by emailing stewart.wright@informedassessment.co.uk

About candidates or participants undertaking an assessment

Information about candidates or participants will be disclosed to our customers in the context of provision of services to them and in connection with assessment(s) in which they have participated.

To facilitate the assessment process, information may also be passed to other associates, suppliers and organisations which could include:

- Providers of systems such as email services or enquiry response services
- Cloud-based services
- Human resource and other assessment service providers
- Accounting, auditing or professional advisory services.

Informed Assessment does not send marketing communications to candidates or participants in any circumstances, unless they wish to enter, at their own choice or request, into a customer relationship with us.

We never sell or pass on candidate or participant information to third parties who might use data to sell any products or services.

Third-party contact details supplied by candidates or participants

As part of our assessment services, we may request that candidates or participants volunteer contact details of a third-party, for example, someone who can answer questions about their work in order to generate a 360-degree feedback report.

We advise candidates or participants to inform any such third party that they intend to disclose this information and to obtain their prior consent to such disclosure.

If we then contacted those third-parties as a result of their details being disclosed to us by a participant in our assessment process, we confirm that we will use that information and any subsequent information submitted in accordance with this Policy.

Third-party contact details to support our business processes

We may also disclose personal (customer or candidate / participant) information to third parties in the event of:

- Our working as a business partner alongside other Consultants or organisations who are directly involved in the same project
- The sale of any part of our business or assets of our business, in which case we may disclose personal data to the prospective buyer of the business or its assets, or to a joint venture or merger partner
- Our assets being acquired by a third party, at which point, personal information on customers or candidates / participants will be one of the transferred assets

- Our being under a duty to disclose or share personal data in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions of service and other agreements, or to protect our rights, property or safety of those of our customers or others.

How is information transmitted?

The vast majority of contact from customers, candidates or participants communication is via email, and the vast majority of assessment results are sent by email as well.

The transmission of information via the internet either by us or to us can never be completely secure. Although we do our best to protect personal information, we cannot guarantee the security of your data transmitted to or from us via email or via the website. If you use electronic means to in order to transfer personal data to us, any such transmission is at your own risk. Once we have received your information, we will use procedures and security features to prevent unauthorised access. We can also apply password protections to standard documents sent by us upon request.

How is information protected?

By Informed Assessment

We are committed to keeping personal information confidential and secure.

We take appropriate steps in the form of technical, administrative and physical security controls to protect personal information. Any sensitive personal data will be treated securely by Informed Assessment in accordance with this Privacy Policy, the UK Act and other current and relevant legislation or regulations.

Personal data flows have been mapped and an assessment undertaken covering the risks of data breach and / or loss to laptop-based personal data, mobile phone-based personal data and printed materials involving personal data, with remedial actions, activities and policies.

The key aspects of this are as follows:

- Use of Windows 10 PRO laptop technology with firewall and security settings enabled, Norton Internet Security enabled, with encryption enabled, high-strength passwords for initial access and for re-opening the laptop if left idle, and for any particularly sensitive folders
- Secure One Drive cloud-based back-up
- Use of business iPhone including the latest security updates and password protections

- Different deletion / shredding policies as appropriate reflecting the different types of data held and the different formats of these (including emails and any paper documents)
- Security policies when travelling or when the office is unattended
- Security policies covering the use of any Flash drives when exchanging data within the office
- Policies covering the secure destruction of hard-drives for laptops / PCs at the end of their service periods.

By assessment sub-processors

We primarily use SHL Talent Measurement and Saville Assessment, as noted above. Part of our due diligence process with them has included the capture of information regarding their data security accreditations and related data security policies and processes so that we can gain assurances as to how they protect data.

How long and in what way is candidate and participant data kept?

By Informed Assessment on its systems

We will generally keep candidate and participant data on our systems in a secure manner for as long as is necessary for the purposes (referred to above) for which we process that information. This is to allow us to fulfil legal, accounting or statutory requirements, and which also enable us to support any ongoing longer-term personal development, at a service sponsor's request, for a period of up to 3 years.

We may however destroy, delete or anonymise information within this period as we consider appropriate from time to time and depending upon the nature or context of the assessment, or upon request from a customer, who, as data controller, sponsored the assessment process.

By assessment sub-processors

Our assessment sub-processors have their own policies for keeping candidate and participant data, including assessment results and reports. These may be amended or developed by them as they see fit.

We work primarily with two assessment sub-processors, namely SHL Talent Measurement and Saville Assessment.

Informed Assessment has the authority to request deletion of candidate or participant data.

From May 2018, we will be requesting SHL Talent Measurement to delete candidate test reports and results older than 24 months and before it is 36

months' old. Saville Assessment automatically anonymise candidate data after 2 years.

How can personal data be amended?

By customers on their data held on Informed Assessment's systems

This can be undertaken by request to stewart.wright@informedassessment.co.uk

By candidates and participants on their data held on Informed Assessment's systems

In relation to amendments to their identification data (see the definition in the section above), this can be undertaken by request to stewart.wright@informedassessment.co.uk

This of course does not apply to Assessment Data as defined above.

By candidates and participants on their data held on assessment sub-processor systems

Candidates should also be able to make amendments to their identification data (see the definition in the section above) held by our assessment sub-processors, either by themselves on the sub-processor platform, or upon request in the event of any problems, depending upon and subject to how long they hold data and in what format, in accordance with the data retention or anonymisation policies outlined above.

This of course does not apply to Assessment Data as defined above.

How can the processing of personal data be paused or restricted?

On or by candidates and participants

This depends on which assessments are being undertaken, in what sequence these are being undertaken and which outputs are being used.

While completing a sequence of different assessments on an assessment sub-processor's system, a candidate or participant can take a break, pause or log-out of the system as each element or individual assessment is completed as part of a longer sequence.

Some untimed assessments can be paused or left part of the way through and data is retained by the system at the time when the exercise is resumed.

If an assessment has been completed and scored, and a tailored summary or report is in the process of being prepared by Informed Assessment, this tailored report-writing process by Informed Assessment, or the forwarding of results by

Informed Assessment can be paused, restricted or cancelled prior to submission by Informed Assessment to the customer.

The customer's instructions relating to the forwarding of completed results to be applied by Informed Assessment can be changed or restricted at the customer's request.

Pausing or restricting the processing of personal data would not apply when:

- A candidate or a participant is part of the way through a timed assessment such as an ability test
- A candidate or a participant has actually completed the particular assessment online, as the system would automatically score the output and make it available for download / access to Informed Assessment
- A tailored report or summary has been written and submitted by Informed Assessment to the customer.

How can personal data be deleted?

By customers on their data held on Informed Assessment's systems

This can be undertaken by request to stewart.wright@informedassessment.co.uk

By customers on their candidate data held on assessment sub-processor systems

If the data has not already been deleted or anonymised already by the assessment sub-processors in line with their policies as noted above, this can be undertaken by request to stewart.wright@informedassessment.co.uk

By candidates and participants on their own data held on Informed Assessment's systems

If the data has not already been deleted or anonymised already by the assessment sub-processors in line with their policies as noted above, this can be undertaken by request to stewart.wright@informedassessment.co.uk

By candidates and participants on their own data held on assessment sub-processor systems

If candidates or participants wish to exercise any of their rights in relation to personal data, we advise them to contact us in the first instance so that we can facilitate this process for them.

Access to the information held

By customers on their data held on Informed Assessment's systems

This can be undertaken by request to stewart.wright@informedassessment.co.uk

By candidates and participants on their data held on Informed Assessment's systems or on assessment sub-processor systems

Candidates and participants are entitled to know what personal information that we hold about them, and / or which our assessment sub-processors hold about them.

If they would like to verify the information that Informed Assessment or the assessment sub-processor(s) hold(s) about them, they are advised to contact Stewart Wright, Director via stewart.wright@informedassessment.co.uk

Changes to our Data Protection and Privacy Policy

We may update this Data Protection and Privacy Policy from time to time. The updated Privacy Policy will be published on our website, or, in the event of any access problems, by contacting Stewart.wright@informedassessment.co.uk

You should refer to the Policy from time to time in order to keep yourself up to date with the regards to the way that we process personal information.

Contact information

If you wish to contact us, please email Stewart Wright, Director at stewart.wright@informedassessment.co.uk