

Introduction to the Data Protection Notice

Please read this Data Protection Notice (“Notice”) to continue. It sets out how and why your Employer and SHL collect your personal information. For any defined terms which are not defined on this page, please see the definitions included within the Notice.

Please read the entire Notice carefully.

I confirm I have read and understood this Notice.

I agree that SHL can contact me, including by email, in order to participate in future test trials, surveys and to provide further information relating to the assessment.

If you have questions about this Notice, please refer to [FAQ page](#).

Data Protection Notice

This Notice was last updated 14 May 2018.

1 Who we are

This Notice describes how;

- (1) your Employer/ potential new Employer (“**Employer**”); and
- (2) SHL Group Limited of The Pavilion, 1 Atwell Place, Thames Ditton, Surrey KT7 0NE, England (together, **SHL** or **we** or **us**)

respectively use your information collected through this online Assessment.

SHL will process and collect information about you when you complete an SHL assessment (“**Assessment**”) in accordance with this Notice. Some information is (“**Personal Information**”), personal information about you or from which we can identify you.

This Notice also covers us, and our affiliated group of companies, where we are data controller. Each group company is a data controller and we've listed them [here](#).

This Notice sets out the way the Employer and SHL use your information: **what is collected, how it is collected, how it is used, why it is used, who it is shared with and the rights to which you will be entitled.**

[Section 2](#) (Employer as the Data Controller) provides further information on **processing of your personal information by the Employer as the data controller.**

[Section 3](#) (SHL as the Data Controller) describes **processing of your Personal Information by SHL for our own purposes as data controller.**

[Section 4](#) (The Employer and SHL as the Data Controller) provides additional information **on who SHL and the Employer share your data with and an overview of your rights under data protection law.**

2 Employer as the Data Controller

SHL collects your Personal Information on behalf of your Employer. If you have a query as to the identity of the Employer, please contact the SHL Data Protection Officer (DPO) on dpo@shl.com or the contact details included at the end of this Notice

The **Employer will be the data controller** in respect of your Personal Information and the Employer will decide what data is collected, the purposes for which it is collected and who it is shared with. You will be able to exercise your rights directly against the Employer in respect of this Personal Information (see section 4 (The Employer and SHL as the Data Controller) for more information)).

The data collected

We collect and process the categories of data on behalf of the Employer as set out below. The categories of data which are collected about you vary depending on the type of Assessment and instructions we receive from the Employer. Not all the categories of data listed below may be collected about you. **If you require further information as to the extent of the data that is collected you should contact the Employer directly.**

What we collect

Information that you give us and the Employer when you complete an Assessment, including:

- i. “**Candidate Data**” which includes your:

- name;
- email address; and
- account log in details.

ii. **“Assessment Data”** which are your answers to the Assessment questions.

Using the **Candidate Data and Assessment Data**, we generate the (**“Results Data”**), which includes the results of your Assessment.

Additionally, we will collect information if provided to us by your Employer (“Employer Provided Data”). To the extent provided by your Employer to us, this will include:

- CV or resume information (including your employment history, educational background, skills, languages and hobbies);
- details of the role you are in, or applying for;
- your manager's rating of performance;
- confirmation whether you were hired; and
- performance appraisals.

What we do with the data

We use your Candidate Data, Assessment Data, Results Data, and Employer Provided Data (if provided) on behalf of the Employer to:

1. invite you to complete an Assessment on behalf of the Employer;
2. use the Results Data to compile a report given to the authorised representatives of the Employer (**“Assessment Report”**).
3. when instructed by the Employer, provide you with an Assessment Report;
4. provide our services to the Employer;
5. when instructed by the Employer, compare your Candidate Data, Assessment Data, Results Data and Employer Provided Data (if provided) with anonymised Benchmark Data (as defined below) to provide talent analytics services to the Employer so that the Employer can understand how your Personal Information compares to the market in the role you are in, or applying for; and
6. manage and administer our services.

Why this data is collected and how long it is retained by us

We hold and process your Candidate Data, Assessment Data, Results Data, along with Employer Provided Data, in accordance with the Employer's instructions. **The reasons why the Employer collects your Personal Information will vary** but generally, the Employer will instruct us to process your Personal Information because they have one or more of the following legitimate interests:

- I. to evaluate your suitability for a role you have applied for;
- II. to perform analytics on the characteristic profile required for the role;
- III. to evaluate your promotion opportunities or development requirements.

as part of an overall recruiting/development/promotion process. The Employer may also instruct us to process your Personal Information because you have provided consent or if it is necessary on reasonable request by a law enforcement or regulatory authority, body or agency or in the defence of a legal claims on behalf of the Employer.

We will keep your Personal Information **on behalf of the Employer** in accordance with the Employer's instructions. **The period of time that we are instructed to hold your Personal Information, varies from Employer to Employer.** We will not delete your Personal Information if

relevant to an investigation or a dispute. It will continue to be stored until those issues are fully resolved.

You should contact the Employer directly if you require more information on this section

Data Sharing

We will only share your Personal Information processed on behalf of the Employer with the Employer and on the Employer's instructions. The Employer may share your Personal Information with other third parties including its group companies and those parties listed at section 4. You should contact the Employer for more information on who they share your Personal Information with.

3 SHL as the Data Controller

When you complete an Assessment we will collect Personal Information about you for the purposes outlined below. We will be data controller in respect of this information and we will be responsible for your Personal Information including for what purposes your information is collected and used.

If you have any questions on the processing of your data by SHL as data controller you can contact the SHL Data Protection Officer (DPO) on dpo@shl.com or the contact details included at the end of this Notice

What we collect

1. Information that you or the Employer give us when you complete an Assessment: including your **Candidate Data**, **Assessment Data**, and your **Results Data** and your **Employer Provided Data** (if provided by Employer).
2. **OPTIONAL RESEARCH QUESTIONS** - At the beginning of an Assessment, we will ask you to answer a set of **optional** demographic research questions ("**Research Data**"). **Some of this demographic data collected will be of a sensitive nature and be classified as a special category of personal information** as such you will be required to provide us with your consent to process this information during the Assessment. **Providing this information is completely voluntary** – if you do not want to answer a question, simply select the "*Prefer not to answer*" option . If you choose not to answer these questions, it will not prevent you from taking the Assessment or affect the Assessment results in any way. We will store your Research Data in a de-identified format and only use it in an anonymised format for research purposes as further detailed below. Your Research Data will NOT be provided to the Employer. The questions ask you to provide certain types of demographic information for research purposes including your:
 - Gender;
 - Age;
 - First language;
 - Country of Origin;
 - Country of Residence;
 - Highest educational qualification achieved;
 - Highest education qualification you are working toward;
 - Level at current job;
 - Years of Employment Experience; and
 - Business function and Industry section you are currently working in.
 - Ethnicity.
3. **Technical Information** relating to the systems you used to take the Assessment including:

- browser types;
- operating systems;
- IP addresses;
- Date / time stamps.

4. We also collect your country of residence (**Country of Residence Information**).

How we use it

We **anonymise** a combination of your **Assessment Data, Results Data, Employer Provided Data** (if any) and **Research Data** for our own purposes. Once anonymised we use this data to:

1. ensure that our Assessments remain fair, objective and prevent unfair discrimination;
2. develop and improve the services and assessments we offer; and
3. create aggregate benchmark measurements against industry recognised differences for different groups, jobs and industries (**Benchmark Data**) to be used for the above purposes.

Only if you have provided us with your express consent, we use your name and email address, for our own purposes, to:

1. request that you participate in future test trials and surveys; and
2. request that you provide us with further information relating to the assessment to further our research and develop our assessment processes.

We use your **Technical Information** to primarily provide you or the Employer with service support and for our own purposes including to identify issues with the assessment and your experience of it.

We collect your Country of Residence Information because we have a legitimate interest to comply with legislation applicable to the SHL group, in particular US Trade Sanctions law. .

Why we use it

We anonymise your **Assessment Data**, your **Results Data**, your **Employer Provided Data**, **Research Data**, and **Candidate Data** because we have a legitimate interest to create Benchmark Data to develop and improve our services.

We use your **Technical Information** because we provide technical support to the Employer as well as individuals who reach out to us using our web help form and we have a legitimate business interest in understanding how our assessments are accessed, how they are used and any problems users have with them across multiple devices.

If you require further information regarding our legitimate interests as applied to your personal data, you may contact please contact the SHL Data Protection Officer (DPO) on dpo@shl.com or the contact details included at the end of this Notice

We will also process your Personal Information if it is necessary on reasonable request by a law enforcement or regulatory authority, body or agency or in the defence of a legal claims against us.

How long we keep it

We keep your **Assessment Data, Results Data, Employer Provided Data**, Candidate Data, and **Research Data**, for our own purposes in a de-identified form for a maximum of seven years. We will not delete your Personal Information if it is relevant to an investigation or a dispute. It will continue to be stored until those issues are fully resolved.

We keep your Technical Information and Country of Residence for seven years.

Where your Personal Information will be held

We store your Personal Information in data centres located in the United Kingdom.

Your Personal Information will be transferred to the United States or India where a limited number of personnel in our US and India offices, as well as our trusted third party vendors and service providers, will have access to Personal Information in order to provide their services. As the U.S. and India do not have equivalent data protection laws to those applicable in the EEA we have an Intragroup Agreement in place, signed by all SHL affiliates, which contains the European Union (EU) Standard Contractual Clauses (SCCs) which have been approved by the EU data protection authorities for the transfer of data outside the EEA, and our third party vendors and service providers are also required to sign up to SCCs in accordance with Article 46 of the General Data Protection Regulation. All SHL affiliates have the same technical, physical, and administrative security controls and are required to comply with our data protection policies and procedures, applicable laws, governing the collection and use of personal information.

We are happy to provide you with copies of the regulator-approved SCCs, which you can request from the SHL Data Protection Officer (DPO) on dpo@shl.com or the contact details included at the end of this Notice

When do we share Personal Information

We have set out the circumstances in which we will share your data with third parties below:

- We will share a combination of your Assessment Data, Results Data, Employer Provided Data and Research Data within our group companies when required to provide maintenance and support services and so that we can continue to improve the services we provide across the group.
- We will also share your information with our trusted third party service providers, including our survey tool provider, IT security provider and cloud hosting platform provider. Our service providers will be required to meet our standards on processing information and security.

4 The Employer and SHL as the Data Controller

Data Sharing

The Employer and SHL as data controller will share your data with the following third parties in the below circumstances:

- If we are discussing selling or transferring part or all of our business, Personal Information will be transferred to prospective purchasers under suitable terms as to confidentiality;
- If we are reorganised or sold, Personal Information will be transferred to a buyer who can continue to provide services to you;
- If we are required to by law, or under any regulatory code or practice we follow, or if we are asked by any public or regulatory authority – for example the Police;
- If we are defending a legal claim your Personal Information will be transferred as required in connection with defending such claim.

Data Subject Rights

We've listed the rights you have over your Personal Information and how you can use them below. These rights are subject to exemptions in applicable law and will only apply to certain types of information or processing. As described above, the Employer will be data controller so you should contact them directly if you want to exercise a right over data for which they are data controller.

For the Personal Information where we are data controller, you can exercise these rights by contacting the SHL Data Protection Officer (DPO) on dpo@shl.com or the contact details included at the end of this Notice

1. **The right to withdraw consent:** Where we or the Employer have obtained consent for some of the ways we use your information you can remove that consent at any time by contacting the Employer or the SHL Data Protection Officer (DPO) on dpo@shl.com or the contact details included at the end of this Notice
2. You can ask us to confirm if we are processing your Personal Information and, if we are, you can ask for access to that Personal Information as well as further details including why your data is being used and for what purposes.
3. You can ask to correct your Personal Information held by us and the Employer if it is wrong.
4. You can ask us and the Employer to delete your Personal Information
5. You can ask us and the Employer to restrict how we use your Personal Information.
6. You can ask us and the Employer to help you move certain Personal Information to other companies. To help with that you have a right to ask that we or the Employer provide your Personal Information in a machine readable format to another company.
7. You can ask us and the Employer to stop using your Personal Information, but only in certain cases. This applies where we are processing your personal information based on a legitimate interest (or those of a third party) and you can object to processing on this ground. However we will be entitled to continue processing your information based on our compelling legitimate interests.

You also have a right to make a complaint to a Supervisory Authority. Where we are the data controller you can contact the UK Information Commissioner's Office; or the local data protection regulator in your jurisdiction.

Where the Employer is the data controller, you can contact the regulator in the location where the Employer is based.

Questions or Complaints

Questions about the results of your assessment or the Employer's use of your Personal Information should be sent directly to the Employer at whose request you are taking the assessment.

If you have any questions about this Notice please contact the please contact the SHL Data Protection Officer (DPO) on dpo@shl.com or the contact details included at the end of this Notice.

Changes to the Notice

This Notice will be changed from time to time. If we change anything important about this Notice (the information we collect, how we use it or why) we will provide a prominent link to it for a reasonable length of time following the change.

If you would like to access previous versions of this Notice, please contact the SHL Data Protection Officer (DPO) on dpo@shl.com or the contact details included at the end of this Notice

Other policies

Security

We are committed to keeping your personal information safe. We have implemented physical, technical and administrative measures to help prevent unauthorised access or use of your information. For more information about the security measures we have please see our: [Security Policy](#).

Sanctions

SHL products and services are subject to US sanctions law. As a result, prohibited individuals, or those located in certain countries (Cuba, Iran, North Korea, Sudan and Syria), are not authorised to take assessments on our systems. Please contact us at dataquestions@shl.com with any questions.

SHL Data Protection Officer Contact Details:

Email: dpo@shl.com

Postal Address: Data Protection Officer, SHL Group Ltd, The Pavilion, 1 Atwell Place, Thames Ditton, Surrey, KT7 0NE, England.