

# Privacy Policy

## 1. About us

Please read the following Privacy Policy to understand what personal information you provide us with, how this information is processed and the purposes for which such processing is undertaken by Thompson Dunn Ltd ("**Thompson Dunn**", "**our**", "**we**" or "**us**").

Thompson Dunn Ltd of 5 Church Walk, Highgate, London, N6 6QY, UK are data controllers with respect to personal information about you that we receive from you and/or from our clients. We may also act as a data processor of your personal information in certain circumstances, in which case we will process personal information only under the instructions of our clients.

## 2. Scope of this Privacy Policy

This Privacy Policy explains how we collect and process personal information when we provide our psychometric assessment and reporting services ("**Services**"). The sale and provision of such Services are governed by our Standard Terms and Conditions.

We collect personal information about:

- clients that purchase our Services (or the key contacts that work for our clients) ("**Clients**"); and
- individuals that provide responses ("**Participate**") in any of the psychometric assessments we use ("**Assessment**") at the request of a Client ("**Participants**").

This Privacy Policy applies to any individual about whom we process personal information in the course of providing our Services ("**you**" or the "**data subject**").

## 3. The personal information we process

You may give us information about you by filling in forms on our website at [www.thompsondunn.com](http://www.thompsondunn.com) ("**Website**"), by corresponding with us by phone, email or otherwise, or through the psychometric Assessment platforms we use ("**Assessment platforms**") – Decision Profile; Herrmann Brain Dominance Instrument; Occupational Personality Questionnaire; Myers-Briggs Type Indicator; & GMA Ability Tests - as you may be invited by us or our Client to complete an assessment ("**Assessment**").

You may provide personal information to us when you register to use our Website, use the Assessment platforms, complete an Assessment, subscribe to our information services, place an order on our site, post in discussion boards, enter a competition, promotion or survey, when you report a problem with our Website or the Assessment platforms or otherwise communicate with us.

### 3.1 Information we collect through our Website

The personal information we collect through our Website may include your name, occupation, company for which you work, business address, home address, email address and phone number and biographical information. If you contact us, we may also keep a record of that correspondence.

When you use our Website, we also automatically collect the following information through the use of cookies and similar technologies:

- technical information, including browser type and version, time-zone setting, browser plug-in types and versions, operating system and platform;
- traffic data, location data, weblogs and other communication data, required for our own billing and administration purposes;
- usage data, such as the source address that the page request is coming from, including your Internet protocol (IP), domain name, date and time of the page request, the referring website (if any) and other parameters in the URL (e.g. search criteria); and
- information about your visit, including: the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); pages you viewed or searched for; page response times; download errors; length of visits to certain pages; page interaction information (such as scrolling, clicks, and mouse-overs); methods used to browse away from the page; and any phone number used to call our customer service number.

See Section 11 below and our Cookie Policy for more information on our use of cookies and similar technologies.

### 3.2 Information we collect from Participants when Participating in an Assessment or using the Assessment platforms

Clients may provide personal information about Participants that have been nominated to undertake an Assessment. This information may include the Participant's name, email address and other contact details. Participants may also provide this information directly to us.

Participants may take part in Assessments through the Assessment platforms or in a paper-and-pencil format.

When Participating in an Assessment or using the Assessment platforms, we will ask the Participant to provide responses that may constitute personal information. We categorize such personal information as follows:

- **"Identification Data"** which means information such as your name, email address and other contact details.

You must provide Identification Data as this is required in order for us to administer the Assessment, provide the results to the Client who requested that the Assessment is made available to you for completion, and for the purposes set out in the section entitled *"For what purposes do we process information about you?"*

- **"Assessment Data"** which means your responses in Assessments; this may include, or may allow us to deduce, information such as:
  - motives;
  - talents;
  - aptitudes;

- competencies;
- interests; and
- behaviour in the workplace.

You will be required to provide a response to some (if not all) of the questions within the Assessments. If you do not provide a response to certain questions within the Assessment, you may not be able to proceed to the next section or it may affect your Assessment score.

- **"Research Data"** which means responses to questions about you and which will include information such as:
  - your gender;
  - your age;
  - your cultural background;
  - your qualifications;
  - your work experience; and
  - details regarding your employment, responsibilities and work.

You do not need to provide Research Data to us. This information is entirely voluntary (see below).

### 3.3 Special categories of personal data

Research Data may include personal data that reveals your racial or ethnic origin, which is classed as a "special category of personal data" under data protection law. Research Data does not form part of the Assessment and is only used for research purposes in order to monitor tests and questionnaires for fairness and to maintain a high standard of Assessment.

Where an Assessment asks you to provide Research Data, we will ask for your explicit consent to collect and process such information as this will help us to monitor our tests and questionnaires for fairness and maintain a high standard of Assessment. You do not have to provide Research Data to us; however, we will be grateful if you would complete all the questions as this will help us to monitor our tests and questionnaires for fairness and maintain a high standard of Assessment. Your ability to complete an Assessment will not be affected by your choice not to provide such Research Data, nor will this choice affect your Assessment results.

Any Research Data that we collect will be processed in accordance with this Privacy Policy and applicable data protection laws, and we shall ensure that it is treated securely.

From time to time, Participants may volunteer additional personal information about themselves to us, which may include special categories of personal data. For example, Participants may inform us about a health issue or disability which may impact the way in which they undertake the Assessment. We will obtain explicit consent before further processing any special categories of personal data that a Participant provides. With your consent, this information will be communicated to the Client requesting the Assessment whose responsibility it is to take any decisions regarding the impact on the Assessment process as a result of the information. Please note that without such consent, we may not be able to address the needs of individual Participants.

## **4. For what purposes do we process personal information about you?**

We are committed to keeping your personal information confidential and secure. The way in which we use your personal information will depend upon whether you are a Client or a Participant.

### **4.1 Personal information about Clients when using our Website or ordering services**

We will use personal information about Clients in the course of providing Services for the following purposes:

- to fulfil our obligations arising from any contracts entered into between you and us, and to provide you with the information, products and Services that you request from us and billing you for the products and services provided;
- to provide you with information about further Assessments, reports and services we offer that are similar to those that you have already purchased or enquired about;
- to notify you about changes to our service;
- to ensure that content from our site is presented in the most effective manner for you and for your computer.

Personal information provided by you in relation to each of your visits to our Website will be used:

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to better understand Website usage, including what areas of our Website users prefer;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer; and
- as part of our efforts to keep our site safe and secure.

This information is stored in secure servers and is used for aggregated and statistical reporting.

### **4.2 Personal information about Participants when Participating in an Assessment or using our Assessment platforms**

We process Identification Data and Assessment Data provided in relation to your Participation in Assessments for the purpose of providing Services to our Clients. This may include processing this data in order to:

- identify your Assessment and responses;
- assess your aptitudes and preferred working styles;
- produce Assessment reports for our Client who has made this Assessment available to you.

We may process Research Data for research purposes. We research responses to our Assessments in the light of areas such as gender, age and cultural background over the longer term; this is considered best practice and allows us to monitor our Assessments for fairness in use.

The Research Data that we collect goes through the process of aggregation and/or anonymization. The Research Data that is personally identifiable to you is not individually disclosed to any Client or any third parties.

If you complete the Assessment in a jurisdiction that prohibits completion of such Research Data, you should not complete those details to the extent such law prohibits doing so, though we would be grateful if other details were completed.

We may also process your personal information for the purposes of using and refining Assessment tools, analysis, administration, enforcing and defending legal rights, systems testing, maintenance and product development, customer relations, performing our obligations to Participants and Clients whether under contract or otherwise, and to help us in future dealings with you.

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

We may also provide a copy of the Assessment Data to our Clients for use by them for their own internal human resource management purposes.

Clients are entitled to use the personal information that we provide to them as part of our Services for their own purposes; however, such Clients are obliged to process such personal information in accordance with their own obligations under applicable data protection laws. You will have rights with respect to the manner in which our Clients process such personal information provided by us to them.

## **5. Profiling**

The Assessments we use are conducted, in part, on the basis of profiling, which means that they process your personal information using software that is able to process your responses to questions and provide estimates of different attributes including your personality, preferred behaviour, motivations, talents and abilities.

If you are a Participant, you should note that it is our Clients that make decisions on the basis of our Assessments. If you have any questions about how Assessment results will be used in their decision-making process, you should ask the Client (i.e. your employer or potential employer) for further information.

If you are a Client, it is your responsibility to ensure that your decision-making process - including how you interpret the Assessment results - complies with applicable laws.

## **6. Legal bases for processing your personal information**

We must have a legal basis to process your personal information. In most cases, the legal basis will be one of the following:

- a. to fulfil our contractual obligations to Clients; for example, to conduct the Assessments, to deliver Assessment results and to ensure that invoices are paid correctly;
- b. to comply with our legal obligations;
- c. to meet our legitimate interests; for example, to provide the Services, to conduct analysis that help us to improve our Services, to ensure that any complaints or concerns can be promptly dealt with, and to ensure our records are kept up to date and accurate; and

- d. Your consent, when we process any special categories of personal data about you. You have the right to withdraw your consent at any time by contacting us using the contact details below.

## 7. Marketing

We do not send marketing communications to Participants who are only registered as Participants; however, we may contact you if you have provided us with your contact details and are a Client or prospective Client of our Services.

## 8. To whom may we disclose information about you?

Information about Participants will be disclosed to our Clients in the context of the provision of Services to them in connection with the Assessment(s) undertaken. Individual responses may be disclosed to Clients, and an overall Assessment report will be provided to Clients, containing an overall Assessment score and additional comments about a Participant's performance.

To facilitate the Assessment process, information about you may also be passed to respective suppliers from time to time, which may include providers of:

- systems to facilitate the service such as email services and enquiry response services;
- cloud-based services;
- human resource and other Assessment services;
- web-based accounting systems; and
- professional advisors and auditors.

We may also pass anonymized and/or statistically aggregated data to our approved agents as described above, and to current or future potential Clients or research institutions. Because this information cannot identify you as an individual, it does not constitute personal information.

We may disclose your personal information to third parties:

- In the event that we sell any part of our business or assets of our business, in which case we may disclose your personal data to the prospective buyer of the business or assets. We may also disclose your personal data to a vendor of another business or assets that we are acquiring or to a joint venture or merger partner.
- If our assets are acquired by a third party, personal information held about our Clients and Participants will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Website Terms of Use or our applicable Standard Terms and Conditions and other agreements; or to protect our rights, property, or safety or those of our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

## **9. International data transfers**

Due to the international nature of internet-based Assessment and training services, we may from time to time appoint third parties to process data containing information about you on our behalf as a data processor, or store such information in, or transfer it to persons located in, countries outside of the European Economic Area ("EEA"). These countries may not have data protection laws equivalent to those which are in force in the EEA to protect your information. Where we transfer your information to such third-party data processors and/or third parties outside of the EEA, we shall ensure that they provide sufficient guarantees in respect of the technical and organizational security measures, and take reasonable steps to ensure their compliance with those measures in order to ensure your information is adequately protected in accordance with applicable data protection laws. For more information on the appropriate safeguards in place, please contact us at the details below.

## **10. Third-party contact details**

As part of our Assessment process, we may request or you may volunteer contact details of a third party; for example, someone who can answer questions about your work in order to generate a 360 feedback report. You should inform such third party that you intend to disclose this information and obtain their prior consent to giving us their contact details.

If we have contacted you as a result of your details being disclosed to us by a Participant in our Assessment process, we will use that information and any subsequent information you may submit to us in accordance with this Privacy Policy.

## **11. Electronic communications, website usage and cookies**

A cookie is a small information file that is sent to your computer and is stored on your hard drive. Our Website uses cookies to distinguish you from other users of our Website. This helps us to provide you with a better user experience when you use our Website. For detailed information on the cookies we use and the purposes for which we use them please see our Cookie Policy.

The transmission of information via the internet either by or to us can never be completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your data transmitted to or from us via our Website or by email. If you use electronic means in order to transfer personal information to us, any such transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

## **12. How do we protect information about you?**

When deciding how long to keep your personal information after our relationship with you has ended, we take into account our legal obligations and regulators' expectations. We may also retain records to investigate or defend potential legal claims.

## 13. For how long do we keep information about you?

We retain Participants' personal information (including test results) for a minimum period of 24 months, after which time we may anonymize the data and use it for research purposes. We will also anonymize data at the request of the Client or the Participant. If the Participant requests their data to be anonymized, we will first inform the Client who requested the Assessment be made available to the Participant.

We retain Clients' personal information for as long as we maintain a relationship with Clients, and then for a reasonable period of time that allows us to assist with any queries, requests or complaints regarding the Assessments and/or the Services, to commence or defend legal claims, and to comply with our regulatory obligations (including record retention obligations).

## 14. Your rights in relation to information about you

You are entitled to see the personal information that we hold about you. You may ask us to make any necessary changes to ensure that personal information about you is accurate and kept up to date. You will not have the right to make changes to the Assessment Data, however, as this would undermine the accuracy and value of the Assessment reports.

If you would like:

- any further information about the personal information that we collect, the purposes for which we collect it and how we protect it;
- a copy of the information we hold about you;
- to verify information we hold about you;
- to anonymize your personal information;
- to object to our use of your personal information;
- to restrict our use of your personal information; or
- to receive your personal information in a usable electronic format and transmit it to a third party (right to data portability),

then please write to us at: Thompson Dunn Ltd, 5 Church Walk, Highgate, London, N6 6QY, UK, or email us at [info@thompsondunn.com](mailto:info@thompsondunn.com). Please note that we will likely require additional information from you in order to honour your requests.

We hope that we will be able to satisfactorily deal with any issues you contact us about. However, you have the right to lodge a complaint with the Information Commissioner's Office, at <https://ico.org.uk/concerns>.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.



## **15. Changes to our Privacy Policy**

We may update this Privacy Policy from time to time. The updated Privacy Policy will be published on our Website and, where appropriate, notified to you by email. You should refer to the Privacy Policy from time to time in order to keep yourself up to date with regard to the way we process your personal information.

## **16. Contact Information**

If you wish to contact us, please send an email to [info@thompsondunn.com](mailto:info@thompsondunn.com) or write to us at Thompson Dunn Ltd, 5 Church Walk, Highgate, London, N6 6QY, UK.

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