

# Propel International Privacy Policy

Last Revised: October 21, 2019

## 1. Introduction

Propel International LLC and subsidiary companies (together "**Propel International**", "**our**", "**we**" or "**us**") recognises the value that users of our Talent Portal (propeltalent.com) and website (propel-international.com) place on the privacy of their personal information. This Privacy Policy details the purposes for which we collect personal data, how we use your data, and how your data is stored.

## 2. What does this Privacy Policy cover?

This Privacy Policy explains how we collect and process personal information when we provide our talent assessment and reporting services ("**Services**"). We collect personal information about:

- Clients that purchase our Services (or the key contacts that work for our clients) ("**Clients**")
- Individuals that provide responses ("**Participate**") to any of our talent assessments ("**Assessments**") 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. How do we collect your data?

Most of the personal data that we hold is provided directly to us when you:

- Register to use our Website;
- Access our Talent Portal;
- Complete one of our Assessments;
- Subscribe to our newsletter;
- Enter a competition, promotion or survey;
- Report a problem with our Website or the Propel Talent Portal;
- Otherwise communicate with us.

Propel International may also receive your data indirectly from the following sources:

- Our Client (your employer or prospective employer) who is providing your details so that you can be invited to complete an assessment
- Other Talent Portal users who provide your name and contact details for the purposes of their own assessment (i.e. 360-degree feedback) questionnaires (see Section 10).

## 4. What data do we collect?

We collect the following personal information:

### 4.1 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, email address, 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 your login information, 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;
- Any phone number used to call our customer service number.

See Section 13 below for more information on our use of cookies and similar technologies.

#### **4.2 Information we collect from Participants when Participating in an Assessment or using the Propel Talent Portal**

Our clients may provide personal information about Participants who 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 our Talent Portal or in a paper-and-pencil format. When Participating in an Assessment or using the Talent Portal, 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 an 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 Section 5: 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.

#### **4.3 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 the EU General Data Protection Regulation (GDPR). This data is used for research purposes to help us monitor our assessments for fairness.

### **5. 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.

#### **5.1 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 log files and is used for aggregated and statistical reporting.

#### **5.2 Personal information about Participants when Participating in an Assessment or using the Propel Talent Portal**

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 personal data for research purposes. In such cases data is combined from large numbers of participants. For example, we may review performance on our assessments against gender, age and cultural background. This is considered best practice and allows us to monitor our Assessments for fairness in use.

We may also process your personal information for the purposes of using and refining Assessment tools, analysis, accounting, billing and audit, credit or other payment card verification, security, 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.

## **6. Profiling**

In certain circumstances we may process your personal data using automated decision-making, including profiling. In such circumstances, you will be made aware that profiling is taking place, and may be able to request that your data is not subject to automated decision making.

## **7. Legal basis 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:

- 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;
- To comply with our legal obligations;
- 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
- 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.

## **8. 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. If you do not wish to receive any marketing communications we may send to you from time to time, please let us know at any time by emailing us at [privacy@propel-international.com](mailto:privacy@propel-international.com).

## **9. 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:

- 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 to protect our rights, property, or safety or those of our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Propel International will not sell, rent, trade or otherwise supply to third parties any personal information obtained from clients or visitors to our websites.

Propel International may disclose your personal information to the following categories of recipient but remains responsible for their compliance with this Privacy Policy and GDPR:

- Our staff (including employees and external consultants), professional advisors and agents;
- Third party service providers which process your personal information on behalf of Propel International and who are bound by contractual obligations to keep your personal information confidential and appropriately secure;
- Purchasers, or potential purchasers, of all or part of our business (and their professional advisors)

Additionally, Propel International may be required to disclose your personal information to government authorities, regulatory agencies and law enforcement officials if mandated by law or if required for the protection of our legitimate interests in compliance with applicable laws.

## **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. Security & Data Protection**

The security of your personal information is of great importance to us. Propel International has industry-standard security measures designed to protect against the loss, misuse and/or alteration of the information under its control. These include:

- Secure computer storage facilities.
- Use of firewalls and other measures to prevent others from accessing confidential data or accessing Propel International's internal networks that store confidential data.
- All of our employees who have access to and are involved in the processing of personal data are required to respect the confidentiality of our visitors' data.

## **12. 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.

## **13. Cookies**

A Cookie is a small file which is stored on your computer's hard disk when you visit a website and will typically record a user's preferences. If you choose not to accept our cookies, some of the features of our website may not work as well as we intend. We collect non-personal information from your computer's web browser. The cookie placed on your computer by the website does not store your name, e-mail address or any other personal information about you. We use both session ID cookies and persistent cookies. A session ID cookie expires when you close your browser. We use session cookies to make it easier for you to navigate our website. A persistent cookie remains on your hard drive for an extended period of time. We set a persistent cookie to store your corporate logo, so that you may see it across pages. Your browser software can be set to reject cookies, including the cookie from our website. However, please note that if you reject our cookies, you will not be able to use this website

#### **14. 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.

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

We retain Participants' personal information for a 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).

#### **16. 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 and/or rectify information we hold about you;
- To request that your personal data is erased;
- 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: Propel International LLC - Registered in the emirate of Dubai, UAE No: 696739, Registered office: Unit 502, Bay Square 1, Business Bay, Dubai, UAE, or email us at [privacy@propel-international.com](mailto:privacy@propel-international.com).

#### **17. 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.

## 18. Contact Information

If you wish to contact us, please send an email to [privacy@propel-international.com](mailto:privacy@propel-international.com) or write to us at your local office using details below:

Propel International LLC - Registered in the state of Delaware, USA No. 5474247, Registered office: 616 Corporate Way, Suite 2-5900, NY 10989, United States of America

Propel International LLC - Registered in the emirate of Dubai, UAE No: 696739, Registered office: Unit 502, Building 01, Bay Square, Business Bay, Dubai, UAE

Propel Talent (UK) Ltd - Registered in England & Wales No. 7315078. Registered office: Suite 1400, 20-22 Wenlock Rd, London N1 7GU, United Kingdom

Propel International NZ - 6 Mitchelson Street, Ellerslie, Auckland, 1051 New Zealand

Propel International SP - Paseo de la Castellana 150, 4º dcha, 28046 Madrid, Spain

Propel International Australia - Level 19, 180 Lonsdale Street, Melbourne VIC 3000, Australia

Should you wish to report a complaint or if you feel that Propel International has not addressed your concern in a satisfactory manner, you may contact the Information Commissioner's Office. For further details please visit: <https://ico.org.uk/make-a-complaint/>