

Sova Assessment Limited Privacy Notice (Candidates)

This Privacy Notice is made available for the benefit of all candidates and individuals who upload personal data and other information to the online assessment tool and related services which are provided by Sova Assessment Limited (**Sova Assessment Tools**). The Sova Assessment Tools are provided on behalf of an employer, potential employer, or other client organization which has decided to use the Sova Assessment Tools (**Client Organization**) as part of a particular recruitment campaign or similar project.

For the purpose of this Privacy Notice, a candidate or individual refers to any person who is either seeking employment with a Client Organization or is in the process of going through a recruitment or development campaign or similar project.

Data Protection Legislation means the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 (DPA 2018), the Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR), and all other applicable UK data protection legislation in force from time to time together with (where the Client Organization is in the EU) the EU General Data Protection Regulation (EU GDPR) 2016/679) and all other EU data protection legislation in force from time to time.

The UK GDPR is very similar to the EU GDPR. In this procedure, reference to the sole "GDPR" means both the "UK GDPR" and the "EU GDPR".

1. INTRODUCTION

Sova Assessment is committed to acting in compliance with current Data Protection Legislation and therefore to protecting your privacy. This Privacy Notice sets out how we process data and includes:

- our status for the purposes of Data Protection Legislation.
- the scope and who the notice covers in terms of personal data.
- who we are and whom to contact.
- the personal data that we collect and hold about you.

- how we collect this data.
- how we store and use personal data.
- our legal basis for processing your personal data.
- information about transfers to third parties and international transfers.
- your rights as a data subject.

2. WE ACT AS DATA PROCESSOR ON BEHALF OF THE CLIENT ORGANIZATION

For the purpose of Data Protection Legislation, Sova Assessment acts as a data processor in relation to the processing of a candidate's personal data. This means that Sova processes your personal data on the instructions of the Client Organization (i.e. the employer or potential employer to whom you are connected) which has commissioned the use of the Sova Assessment Tools.

The Client Organization is the data controller for the purpose of Data Protection Legislation. Further information regarding the Client Organization's collection and processing of your personal data will be contained in the Client Organization's Privacy Notice.

3. SCOPE

This Privacy Notice is provided for the benefit of all candidates whose personal data is collected via self-input on the Sova Assessment Tools, where feedback is provided following completion of an online assessment, and/or following participation in any type of recruitment or development process or similar project. The scope also covers all candidates whose personal data is collected via the Client Organization (the employer or potential employer to whom you are connected) and provided to us, in line with the requirements of Data Protection Legislation.

4. WHO WE ARE AND WHO TO CONTACT

4.1 Who we are

We are Sova Assessment Limited, a company registered in England whose registered office is at Riverside House, 40-46 High Street, Maidstone, Kent, ME14 1JH, United Kingdom. We are online assessment specialists whose aim is to help employers make

accurate and informed decisions and ensure that assessments deliver the best possible experience for candidates.

We provide digital assessment solutions and talent management consultancy services alongside a range of bespoke training solutions.

4.2 Responsibilities

At Sova Assessment we have a Data Protection Manager who is responsible within our business for ensuring that this notice is made available to candidates prior to Sova Assessment collecting/processing their personal data.

Our Data Protection Manager can be contacted directly here (although we would recommend that you contact the Client Organization – as the data controller - in the first instance if you have any questions regarding your personal data):

- compliance@sovaassessment.com
- 0207 947 4330

Sova Assessment has contracted the services of Trust Keith Ltd to act as its Data Protection Officer (DPO). Accordingly, Sova Assessment will seek advice, guidance, and input from the DPO where necessary.

5. WHAT PERSONAL DATA WE PROCESS

The personal data we process on behalf of the Sova Client when you use the Sova Assessment Tools are listed below:

Personal data type:	Source:
Name and email address	You - when you complete an online assessment, where feedback is provided following completion of an online assessment and/or where you participate in any type of recruitment or development process or similar project.

	Data may also be collected from the Client Organization (the employer/potential employer to whom you are connected)
Username or similar identifier	Automatically generated from our online assessment platform
Contact number	You – following completion of an online assessment where feedback is provided to you. Data may also be collected from the Client Organization (the employer/potential employer to whom you are connected)
Age	You - when you complete an online assessment, where feedback is provided following completion of an online assessment and/or where you participate in any type of recruitment or development process or similar project. Data may also be collected from the Client Organization (the employer/potential employer to whom you are connected)
Your photograph	You may be asked for this by the Client Organization (the employer/potential employer to whom you are connected) when you participate in any type of recruitment or development process or similar project.

A video interview	You may be asked to take part in a video interview as part of the recruitment and/or development process or similar project.
Information gathered and entered into a CV	You may be asked for this by the Client Organization (the employer/potential employer to whom you are connected) when you participate in any type of recruitment or development process or similar project.
Information about any disability you have	<p>You - when you complete an online assessment, and/or where you participate in any type of recruitment or development process or similar project.</p> <p>Data may also be collected direct from the Client Organization (the employer/potential employer to whom you are connected)</p>
Details of your education and employment history	You - where you participate in any type of recruitment or development process or similar project. Data may also be collected from the Client Organization (the employer/potential employer to whom you are connected)
IP address	You - where you participate in any type of recruitment or development process or similar project.

6. OUR PROCESSING OF YOUR PERSONAL DATA

We process your personal data on behalf of the Client Organization that has commissioned the use of the Sova Assessment Tools (and related services) for the following purposes:

Personal data type:	Purpose:
Name, email address, telephone number, and username or similar identifier	<p>To administer a computer-generated invitation to you which will enable you to complete the online assessment.</p> <p>To provide you and/or the Client Organization (the employer/potential employer to whom you are connected) with an assessment report which displays your assessment outcomes.</p> <p>Where feedback is provided following completion of an online assessment, for the feedback session to be conducted with ourselves.</p> <p>Where you participate in any type of recruitment or development process or similar project to help the employer make accurate and informed decisions as part of this process.</p>
Age	We use this in anonymized form for research and development purposes only to produce psychometric norms and validity data and/or to help produce our psychometric manuals.
Your photograph	To help the Client Organization (employer/potential employer to whom you are connected) identify you when participating in any type of

	recruitment or development process or similar project.
A video interview	To use as part of the recruitment and/or development process or similar project to help the Client Organization (employer/potential employer to whom you are connected) make accurate and informed decisions.
Information gathered and entered into a CV	To use as part of the recruitment and/or development process or similar project to help the Client Organization (employer/potential employer to whom you are connected) make accurate and informed decisions.
Information about any disability you have	Where you require for reasonable adjustments to be made to enable you to complete the online assessment and/or participate in any type of recruitment or development process or similar project.
Details of your education and employment history	We use this in anonymized form for research and development purposes only to produce psychometric norms and validity data and/or to help produce our psychometric manuals.
Your IP address	For the functioning of our platform

7. OUR LEGAL BASIS FOR PROCESSING

We process your personal data only in accordance with the instructions included in the contract with the Client Organization. Our legal grounds for processing your data derive from those of the Client Organization (the employer/potential employer to whom you are connected) and include:

Legitimate interest

- to provide our online psychometric assessments and any other of our products and services.
- to help enable the Client Organization (the employer/potential employer to whom you are connected) to make accurate and informed decisions for their own recruitment and/or development purposes.
- to provide feedback on any assessment outcomes to you as the individual.
- to keep our records up to date.
- to conduct research and development to improve our products and services.

Performance of a contract

- to enable the performance of a contract (such as an existing contract of employment) or to take steps prior to the entering into of a contract (such as a potential new contract of employment for a new prospective recruit).

Consent:

- with respect to the processing of special category data (which we only process when the Client Organization requires us to do so).

Personal data type:	Legal basis for processing:
Name and email address	Legitimate interest Performance of a contract
Username or similar identifier	Legitimate interest
Contact number	Legitimate interest
Age	Legitimate interest
Your photograph	Legitimate interest
A video interview	Legitimate interest
Information gathered and entered into a CV	Legitimate interest
Information about any disability you have	Legitimate interest
Details of your education and employment history	Legitimate interest
Your IP address	Legitimate interest

8. SPECIAL CATEGORIES OF DATA

We process special category data from you on behalf of the Client Organization (the employer/potential employer to whom you are connected) only when you have consented. Such special category data is only that which is provided by you, the data subject, and is only processed by us where you have consented to this when agreeing to use the Sova Assessment Tools for the purposes of the Client Organization's recruitment campaign or project.

The special categories of personal data concerned are:

Personal data type:	Legal basis for processing:
Nationality Gender Ethnicity Race Plus any additional special categories of data that may be requested by the Client Organization (the employer to whom you are connected)	Legitimate interest Consent

9. CONSENT

Consent is required for Sova Assessment to process the special category data referred to above. Such consent is obtained by the Client Organization (the employer/potential employer to whom you are connected) at the point that you agree to the use of the Sova Assessment Tool prior to you entering any information to such tool.

You may withdraw consent to our processing of special category data at any time by contacting the Client Organization (the employer/potential employer to whom you are connected) to let them know that your consent is withdrawn. The process by which you should contact the Client Organization may be found in the Privacy Notice of the Client Organization.

10. DISCLOSURE

Sova Assessment may share your data with third parties and for the purposes set out below:

Subsidiaries of Sova Assessment

- any of our subsidiaries for research and development purposes, for example, to produce psychometric norms and validity data and/or to help produce our psychometric manuals. In this regard, data is only shared in anonymous or aggregate form.

Third parties (acting as sub-processors)

- associates who provide services on our behalf to enable us to deliver the Sova Assessment Tools (and related services).
- suppliers who provide IT, system administration, and platform services to us, as well as suppliers providing any other services connected to the service we provide.

As required by Data Protection Legislation, any sharing of personal data is subject to appropriate confidentiality obligations and safeguards as per the information below.

- Relevant contractual clauses are in operation to ensure third-party due diligence in relation to data security.
- Third-party processes are checked to ensure that appropriate safeguards are adopted.

11. INTERNATIONAL TRANSFERS OF DATA

Where personal data is transferred outside the UK and the EEA (which includes all EU countries plus Iceland, Liechtenstein, and Norway), we take all reasonably necessary measures to ensure that the protection offered by the GDPR will travel with the data and that your data is treated securely and in accordance with this Privacy Notice and the requirements of Data Protection Legislation. This means that when exporting data abroad, we will ensure adherence with one of the following measures:

- The non-UK/non-EU country's protections are deemed adequate by the EU.
- Relevant contractual clauses are in operation to ensure third-party due diligence in relation to data security.

- Third-party processes are checked to ensure that appropriate safeguards are adopted.
- Specific grounds for the transfer (derogations), such as the consent of the individual, are applicable.

12. RETENTION PERIOD

Sova Assessment will process personal data for as long as necessary to fulfill the purposes for which the data was collected as agreed with the Client Organization (the employer/potential employer to whom you are connected). For further information, please refer to the Client Organization's Privacy Notice.

Unless Sova is otherwise directed by the Client Organization, all candidate personal data collected in Sova's systems will be anonymized for Sova's purposes 6 months after it is submitted and the "digital key" to de-anonymize the personal data will be given to the Client Organization. The digital key will then be permanently erased within Sova's systems.

Once anonymized, data may continue to be used by Sova for developing new norms and developing Sova's software and services. This anonymized data may continue to be used indefinitely by Sova.

If you require further information about specific retention periods, please contact us (see section 4.2 for contact information).

13. AUTOMATED DECISION-MAKING

Automated decision-making means making decisions about you using no human involvement. The products and services that Sova Assessment provides to you on behalf of our clients (the employer/potential employer to whom you are connected) are usually not used in isolation in the recruitment or development process but rather are used to help employers make accurate and informed decisions.

Where a Client Organization (the employer/potential employer to whom you are connected) uses the Sova Assessment Tools in such a manner that a decision is taken in relation to you solely on the basis of your interaction with the Sova Assessment Tools, such use will either be on the basis that this is necessary for entering into or for

performance of a contract between the Client Organization and you or on the grounds of your explicit consent. In such cases, under Data Protection Legislation you have various rights in relation to such processing, including the right to object and the right to obtain human intervention on the part of the Client Organization, to express your point of view, and to contest the decision. Please contact the Client Organization (the employer/potential employer to whom you are connected) if you have any questions on the use of automated decision-making in this situation.

14. HOW WE KEEP YOUR DATA SECURE

Sova Assessment is committed to ensuring the security of your data. As the data processor, we ensure that all necessary steps are taken to protect against the potential loss, unauthorized disclosure of, or access to the personal data we process or use. Sova Assessment adopts the following safeguards to ensure the security of your data.

- Candidate data will be anonymized 6 months after it is submitted to Sova's systems, unless otherwise directed by the Client Organization to whom you are connected (please see section 12, above).
- Access to personal data is restricted to authorized individuals.
- Secure encryption policies are in operation.
- All the provisions of ISO 27001 certification.

15. YOUR RIGHTS AS A DATA SUBJECT

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.

- Right to restriction of processing – where certain conditions apply, you have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organization in certain situations.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling.
- Right to judicial review – in the event that we refuse your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in section 17 below.

You can exercise your right by contacting us at the following email address:
compliance@sovaassessment.com

All of the above requests will be forwarded on to the Client Organization, acting as a data controller, or to a third party, should there be a third party involved in the processing of your personal data (as stated in section 10 above).

16. CHANGES

We may update and alter this Privacy Notice from time to time. Any updates will be published on our website.

17. COMPLAINTS

In the event that you wish to make a complaint about how your personal data is being processed by Sova Assessment (or third parties as described in section 10 above) or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and with Sova Assessment's data protection representatives.

Sova Assessment has contracted the services of Trust Keith Ltd to act as its Data Protection Officer (DPO). Accordingly, Sova Assessment will seek advice, guidance, and input from the DPO where necessary.

The details for each of these contacts are:

Contact name	Supervisory authority	Data Protection Officer
Address line 1:	UK Information Commissioner's Office (ICO)	Trust Keith Ltd
Address line 2:	Wycliffe House, Water Lane, Wilmslow, Cheshire, England, SK9 5AF	20-22 Wenlock Road, London, England, N1 7GU
Email:	casework@ico.org.uk	compliance@sovaassessment.com

CHANGE HISTORY RECORD

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