

Cappfinity Limited

Privacy Policy – Cappfinity VEE

Effective from: 1st October 2020

Cappfinity Limited respects your right to privacy. This Privacy Policy explains who we are, how we collect, share and use personal information about you, and how you can exercise your privacy rights. This Privacy Policy only applies to personal information that we collect through our website at <http://www.cappfinityvee.com> ("Website"). For personal information that we collect when you use or interact with our other services, please see the relevant privacy policies provided when you access each of these services.

If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided at the bottom of this Privacy Policy.

Quick links

We recommend that you read this Privacy Policy in full to ensure you are fully informed. However, if you only want to access a particular section of this Privacy Policy, then you can click on the relevant link below to jump to that section.

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What does Cappfinity Limited do?

Cappfinity Limited is an assessment technology company, headquartered in the United Kingdom but with operations globally. Our products and services are used by people and clients around the world to assess people for selection, development and transformation.

For more information about Cappfinity Limited, please see the "About" section of our Website at <http://www.cappfinity.com/about>

What personal information does Cappfinity Limited collect and why?

The personal information that we may collect about you broadly falls into the following categories:

- *Information that you provide voluntarily*

Certain parts of our Website may ask you to provide personal information voluntarily: for example, we may ask you to provide your contact details in order to register an account with us, to subscribe to marketing communications from us, and/or to submit enquiries to us. The personal information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your personal information.

Within Cappfinity assessments, some of the personal information that you provide may include sensitive personal information, such as health-related information or information about your race or ethnicity, which we need for providing adjustments to our assessments (in the case of relevant disability information), and for monitoring the statistical performance of our assessments in keeping with equality law.

Further, we may also request sensitive personal information when we have been instructed to do so by our client, who is the Data Controller, and Cappfinity is the Data Processor.

You may be invited to take part in a telephone or video interview, the answers you provide may be recorded and these recorded answers may be made available to an end-client such as a hiring employer. If you were to take part in a telephone or video interview as part of a process for a specific organisation (for example, but not limited to, a hiring employer), that organisation will be the Data Controller and Cappfinity will be the Data Processor. If you were to take part in a telephone or video interview as part of a Cappfinity process (for example, but not limited to, Cappfinity VEE or Jobmi), then Cappfinity will be the Data Controller.

- *Information that we collect automatically*

When you visit our Website, we may collect certain information automatically from your device. In some countries, including countries in the European Economic Area, this information may be considered personal information under applicable data protection laws.

Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how your device has interacted with our Website, including the pages accessed and links clicked.

Collecting this information enables us to better understand the visitors who come to our Website, where they come from, and what content on our Website is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our Website to our visitors.

Some of this information may be collected using cookies and similar tracking technology, as explained further under the heading "[Cookies and similar tracking technology](#)" below.

- Information that we obtain from third party sources

From time to time, we may receive personal information about you from third party sources (including clients who ask us to process your personal data on their behalf), but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

The types of information we collect from third parties include for example, your name and email address, and we use the information we receive from these third parties to deliver our service to you, providing you with a consistent user experience and ensuring that we can associate the right assessment data with the right person.

In general, we will use the personal information we collect from you only for the purposes described in this Privacy Policy or for purposes that we explain to you at the time we collect your personal information. However, we may also use your personal information for other purposes that are not incompatible with the purposes we have disclosed to you (such as archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes) if and where this is permitted by applicable data protection laws.

How does Cappfinity Limited process my personal information?

We may process your personal information as follows:

- your name, email address and password may be used to manage your account settings, link to your assessment data, and manage our communications with you;
- any personal information you provide in relation to a disability may be used to provide reasonable adjustments to any assessment that we provide to you;
- any personal information you provide in relation to gender, ethnicity, age, social background or sexual orientation may be used for aggregate level analysis only to compare differences between groups;
- any responses you provide explicitly in response to an assessment question may be processed using automated decision making in relation to the scoring of the assessment, and in relation to your progression in a selection and recruitment process, but your personal information in relation to name, email address, gender, ethnicity, age, social background or sexual orientation will never be used as part of automated decision making.

Automated decision-making

In some instances, our use of your personal information may result in automated decisions being taken (including profiling) that legally affect you or similarly significantly affect you.

Automated decisions mean that a decision concerning you is made automatically on the basis of a computer determination (using software algorithms), without our human review. For example, we use automated decisions to calculate scores on our assessments and to determine your progression through a selection and

recruitment process. We have implemented measures to safeguard the rights and interests of individuals whose personal information is subject to automated decision-making, including ensuring that it is only explicit assessment data (e.g. your responses to explicit assessment questions) that is used in automated decision making and never demographic personal information (e.g. your name, email address, gender, age, ethnicity, social background or sexual orientation).

When we make an automated decision about you, you have the right to contest the decision, to express your point of view, and to require a human review of the decision. You can exercise this right by contact us using the contact details provided under the "[How to contact us](#)" heading below.

Who does Cappfinity Limited share my personal information with?

We may disclose your personal information to the following categories of recipients:

- to our group companies, third party services providers and partners who provide data processing services to us (for example, to support the delivery of, provide functionality on, or help to enhance the security of our Website), or who otherwise process personal information for purposes that are described in this Privacy Policy or notified to you when we collect your personal information;
- to a Cappfinity client who is the Data Controller for your personal information, typically in a situation where you have opted to provide your personal information to this client as the Data Controller, by taking a Cappfinity assessment where Cappfinity is the Data Processor;
- to any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- to a potential buyer (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Policy;
- to any other person with your consent to the disclosure.

Legal basis for processing personal information (EEA visitors only)

If you are a visitor from the European Economic Area, our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person (e.g. to communicate with you about the status of your Cappfinity assessment).

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the “[How to contact us](#)” heading below.

Cookies and similar tracking technology

We use cookies and similar tracking technology (collectively, “Cookies”) to collect and use personal information about you. For further information about the types of Cookies we use, why, and how you can control Cookies, please see our Cookie Notice.

How does Cappfinity Limited keep my personal information secure?

We use appropriate technical and organisational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information. The measures we take to protect your personal information are provided for within our accreditation to ISO 27001 Information Security Management Systems.

International data transfers

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country.

Specifically, our Website servers are located in the United Kingdom, and our group companies and third party service providers and partners operate in the United Kingdom and the United States. This means that when we collect your personal information we may process it in any of these countries.

However, we have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Policy.

Data retention

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

Your data protection rights

You have the following data protection rights:

- If you wish to access, correct, update or request deletion of your personal information, you can do so at any time by contacting us using the contact details provided under the "[How to contact us](#)" heading below.
- In addition, if you are a resident of the European Union, you can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the "[How to contact us](#)" heading below.
- You have the right to opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the "[How to contact us](#)" heading below.
- Similarly, if we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. (Contact details for data protection authorities in the European Economic Area, Switzerland and certain non-European countries (including the US and Canada) are available [here](#).)

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

Updates to this Privacy Policy

We may update this Privacy Policy from time to time in response to changing legal, technical or business developments. When we update our Privacy Policy, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Policy changes if and where this is required by applicable data protection laws.

You can see when this Privacy Policy was last updated by checking the "effective from" date displayed at the top of this Privacy Policy.

How to contact us

If you have any questions or concerns about our use of your personal information, please contact our data protection officer using the following details: Email: dpo@cappfinity.com

The data controller of your personal information is the organization to which you are making your application. The data processor is Cappfinity Limited which is registered with the UK Information Commissioner's Office with registration number Z1879750.