

## Cappfinity Limited Global Privacy Notice

Effective Date: 13/03/2024

Version number: 3.0

### Introduction

Cappfinity Limited (“Cappfinity”) (referred to as “We, “Our” or “Us”), is committed to protecting the privacy and security of your personal data. We have developed this privacy notice to inform you of the data we collect, what we do with your data, what we do to keep it secure as well as the Rights you have over your personal data.

This privacy notice also applied to other websites, products and service owned and managed by Cappfinity:

- Strengths Profile (<https://www.strengthsprofile.com/>)
- Preparation Hub (<https://hub.preparationplus.com/>)

This Privacy Notice is intended to inform individuals about how your personal data is processed, where Cappfinity is the data controller. This means we determine the type of personal data collected and for which purposes.

Cappfinity also acts as a data processor, where other organisations use our products and services. If you are using any of our systems via another organisation (such as your employer, or part of a recruitment process), you should consult their Privacy Notice for all information regarding how your personal data is processed. We have however included some information on this Privacy Notice which will assist with your understanding of what personal data is processed by us, as a data processor.

As we are based and headquartered in the United Kingdom (UK), we are registered with the Information Commissioners Office (the ICO) with registration number Z1879750.

You contact our head office using the following details:

Post:

2230-2235 Regents Court  
The Crescent  
Birmingham Business Park  
Birmingham  
B37 7YE  
United Kingdom

Phone: +44 (0)121 726 5900

Email: [hello@cappfinity.com](mailto:hello@cappfinity.com)

We have offices in the UK, USA, Ireland and Australia and details to these offices can be found [here](#).

We have a dedicated data protection team who can also be contacted via [dpo@cappfinity.com](mailto:dpo@cappfinity.com) who can help with data protection matters.

We have appointed an external data protection officer (DPO) and their details are as follows:

Evalian Limited  
West Lodge  
Leylands Business Park  
Colden Common  
Hampshire  
SO21 1TH  
United Kingdom

Phone: +44 (0)333 050 0111

Website: [www.evalian.co.uk](http://www.evalian.co.uk)

As we have an establishment in Ireland we are not required to formally appoint an EU GDPR Representative, but EU GDPR matters are dealt with and handled by our data protection team based in the UK.

## **About Us**

Cappfinity is an online assessment technology organisation that offers its products and services to organisations across the globe. Its products and services are used by people and clients around the world to assess people for selection, development and transformation for job/hiring selection purposes. More information to our company and history can be found on our website [www.cappfinity.com](http://www.cappfinity.com)

## **Lawful Basis for Data Processing**

The UK GDPR and EU GDPR require Cappfinity to identify appropriate lawful bases to process personal data. As mentioned above we process personal data as both a controller and a processor. The lawful basis we rely on as a data controller are detailed below with brief examples for when they may apply:

Consent	For opting into marketing communications, newsletters, competitions etc
Contractual Obligation	To take steps into entering and concluding contracts of employment
Legal Obligation	Where needed for tax reasons such as UK HMRC purposes
Vital Interests	To ensure we know about medical conditions of our employees or onsite visitors should they require medical attention

Legitimate Interests	To help answer any questions or concerns that may be sent to us from individuals who we may have no prior existing relationship with
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As a data processor we process personal data in line with the lawful basis determined by the data controller. This could be consent which the data controller has collected in order to ensure we as a data processor can process data on the data controller's behalf.

Consents where needed are recorded and gathered within the platforms where the consent is given.

## Personal Data Collected

Due to the nature of our business and data processing activities we collect and process various categories of personal data from various data subjects. The below gives examples of different categories of personal data collected and processed across our different products:

<u>Product Name</u>	<u>Product Description</u>	<u>Personal data</u>
Altitude	A flexible, immersive and Data-driven leadership assessment and development that is strengths-based.	Name, Email Address, Phone Number, Department  (optional) Line Manager's name and email address.
ATS *.cappats.com	Software application that enables electronic handling of candidates with regards to recruitment or hiring needs. Our ATS can allow for assessments to be taken (such as Numerical Reasoning, Verbal Reasoning etc.), can allows to CVs to be uploaded.	Dependent on client requirements, examples of data can include: personal details, right to work information, diversity and inclusion, educational experience, work history/work experience.  For more information, please email dpo@cappfinity.com
Capptivate	Capptivate is a digital assessment, blending behaviour and cognitive assessments to provide a rich, immersive candidate experience and identify the best-aligned, diverse applicants ready to take to the next stage.	Name, Email Address, Assessment score  Optional – Gender, Demographics – Ethnicity, Disability, Age, Socio-Economic Status
Dashboards	Dashboards provide aggregated assessment trends, such as the number of completions and completion rates. This allows employers to identify whether any changes are required to their processes to deliver the outcomes they need.	Name and Email Address

Events	Events is used in conjunction with Virtual Assessment Centre, which can include live activities with candidates and assessors in the same 'video room' or asynchronous exercises where a candidate completes and assessment themselves.	<p>Builder: Name, Email Address</p> <p>Participation: Name, Email Address, scores, notes about attendee, Reasonable Adjustment requirement.</p> <p>Admin: Name, Email Address</p>
InPerspective	Inperspective is a strengths-based 360 tool which provides insight into an employee's strengths, weaknesses, competencies, and potential.	<p>Admin – Name and Email Address</p> <p>Target user (candidate) – Name, Email Address (Optional - Gender, Demographics – Ethnicity, Disability, Age, Socio-Economic Status)</p> <p>Reviewer – Name, Email Address, Relationship to Target User, Question responses of Target User.</p> <p>Report Viewer – Name and Email Address</p>
Insights	Insights allows the clients to access information about their candidates, filter and rank candidates, and make decisions based on the information available to them.	Name and Email Address
Koru	The Koru7 impact skills assessment is designed to measure the 7 soft skills that employers are looking for in their best-fit hires.	<p>Name, Email, Assessment scores</p> <p>(optional) Gender, Demographics – Race, Ethnicity.</p>
Online Reports (Manager Reports)	Feedback reports can be provided after a user has completed an online assessment.	Name and Email Address
Preparation Plus	Preparation Plus is an online portal that provides guidance and technical support to help candidates prepare for Cappfinity Assessment and Development activities	<p>Name and Email Address</p> <p>Dependent on client requirements, Demographic questions can also be asked.</p> <p>For more information, please email <a href="mailto:dpo@cappfinity.com">dpo@cappfinity.com</a></p>



Scheduler	Scheduler is used to organise and administer assessment centres. Scores captured as part of this process can be uploaded to facilitate wash-up conversations.	Name and Email Address
Screening Tool	Screening Tool is used in conjunction with Capptivate Assessments that require any elements to be scored by a person. For the applicable assessments, the question responses that require manual scoring are sent to the screening tool, where users of the tool can view and score the responses.	Assessment Candidate: Name, Email, Job Title, Business Area, Image (video recording), Assessment  Users of Screening Tool: Name and Email address
Simulate	An immersive digital job simulation. Provides candidates with an authentic experience of the job by presenting different real-life scenarios.	Name, Email Address, Assessment score, Image (Video recording)  Optional – Gender, Demographics – Ethnicity, Disability, Age, Socio-Economic Status
Skills Discovery Tool	Company-wide survey that enables organisations to assess the skill distribution within their workforce. The tool provides individuals with insight about their skills, strengths and potential which informs conversations with their manager and self-led career development and decisions. A report of 80 skills with development advice gets shared. Company Admins have access to a dashboard (via the visualise product) to view where all employees have taken the tool, what their skill scores are across the 80 skills and any other skills clusters or demographics agreed with the client (in accordance with the demographics collected at the start of the tool).	Employee: Name, Email address, Password. (Or could be using SSO).  Optional Demographic information (dependent on client requirements).  Company Admin (for Visualise): Name, Email Address
SLVR	Users are given a headset which has our virtual reality software pre-installed on it. Each user is either given a username and password or is asked to create one. Users are not monitored in person using this software. Data is captured on how they use the software, this includes time spent in the software and which levels they have completed. This data is shared back with the client. The experience is generally bespoke for different clients.	Name, Email Address, and Organisation  (Optional – Date of Birth, Gender)

Snapshot	A flexible, user-friendly video interview platform	Name, Email Address, Assessment score, Image (Video recording)  Optional – Gender, Demographics – Ethnicity, Disability, Age, Socio-Economic Status
Strengths Profile	Online Self-Assessment Tool that allows users to identify their realised strengths, unrealised strengths, learned behaviours and weaknesses for personal development.	Free Profile (Consumer): Name, Email Address, Country  Purchase Strengths Profile (Consumer): Name, Email Address, Home Address  Completing a Strengths Profile (Business): Name, Email Address, Country  Optional Demographic questions can be answered – such as but not limited to, race/ethnicity, age, gender, etc.
Tempo	Tempo is an inclusive and predictive pre interview assessment. With client specific interface (branding). Identifies and tests 8 strengths that align to success in a role. Selects and assesses business-critical soft skills at the onset of sourcing. Measures the personal trait that deliver performance at work.	Assessment scores, Work History, Name, Email Address  Optional – Gender, Demographics – Ethnicity, Disability, Age, Socio-Economic Status
VEE (Virtual Experience and Engagement)	A platform to prepare, upskill and level the playing field for all candidate. It gives students self-insights into individual strengths, learning styles, work preferences and values and allows for the development of 5 VEE strengths and competencies through a series of challenges with supporting worksheets for development. Gives Learners an opportunity to practice work simulation to increase confidence and preparation before completing a live employer evaluation.	Name and Email Address

Visualize	It is a client-facing application that provides access to ThoughtSpot visualisations in a controlled environment. Visualize provides aggregated assessment trends, such as the number of completions and completion rates, as well as integrity dashboards. This allows employers to identify specific performance metrics from their assessment processes related to their organisational objectives (e.g. diversity, integrity, candidate experience).	Name, Email Address
Virtual Reality Assessment and development	In combination with an in-person assessor or coach we put users through a virtual reality experience. Their behaviour in this experience is evaluated by the assessor or coach. This drives the creation of a feedback report or debrief interview. All data collected is done in external documents and there are no log-ins.	No PII is captured

Recruitment: Please refer to our recruitment privacy notice [here](#)

Websites: 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.

## **Collection of Special Category Personal Data**

There may also be instances of where we would collect and process special category personal data for our own purposes as a data controller. Typically, these would include information pertaining to health, race/ethnicity, and sexual orientation. Examples of when we would process special category personal data include:

Health (mental and physical)	Employee purposes e.g. reasonable adjustments
Race/Ethnicity	EDI (Equality, Diversity and Inclusion) purposes
Sexual Orientation	EDI (Equality, Diversity and Inclusion) purposes

Where we process and collect special category personal data we ensure the relevant special condition(s) is applied and documented where needed (e.g. in our Records of Processing Activities).

We may at times as part of assessment data processing on behalf of data controllers, process special category data (e.g. race/ethnicity and health). These may be required in order to help them make any reasonable adjustments where needed. This information may also be used anonymously for analytics and research purposes.

If during an assessment you have any questions or concerns in relation to the personal data collected and processed you can contact us using our details above.

## **How We Use Personal Data**

We may use personal data for various activities which can include the following activities:

- For own internal records e.g. invoices, refunds etc.
- To monitor website usage
- To process job applications
- Administer profiles for candidates on our platforms
- Action any data subject right requests
- Communicate with relevant data controllers any communications received from a data subject including (but not limited to) data subject right requests
- Shared services e.g. Finance and HR
- Process an order for a product or other service
- Process payments
- CCTV recordings in our offices
- Seek your views or comments on the services we provide
- Notify you of changes to our services
- Handle an enquiry or complaint you have made
- Sending marketing communications and other company updates

The above list is non-exhaustive and representative. For more information to how we use personal data for specific activities you can contact us as detailed above.

## **Call Recordings**

Some of our assessments may be taken either over the telephone or by a video conferencing system (e.g. Zoom or Teams) and some of these calls may be recorded. The calls are recorded and the answers to questions may be shared with our end-client who may be hiring for a specific vacancy. The end-client will be a data controller in that instance and we would act as the data processor. These call recordings will be kept in line with the data controllers retention period.

For our own recruitment practices, we do not record our phone calls.

For more information to these call recordings you can contact us using our details above.

## **Recruitment and Criminal Data Processing**

As mentioned above we have a recruitment privacy notice which details how we process personal data in line with our recruitment activities. We advertise roles which may also require the need for background checks, which can involve criminal conviction data. This should not deter anyone from applying for any job roles with us as we review any criminal conviction data on a case-by-case basis. Cappfinity does not have official authority to conduct these checks and so we will utilise appropriate



third parties in the relevant territories who have official authority to do conduct these checks on our behalf.

For more information to this you can contact us using our details above and also view our recruitment notice on our website.

## **Children's Data**

Our services are not specifically designed for children under the age of 16. If we do become aware of anyone using our services who may be under 16 we will take all reasonable steps to ensure we do not process their data any further and will communicate this to them directly.

## **Data Sharing**

Due to the nature of our business there may be at times we are required to share data with other departments or members of our group organisation. Examples of this can include for recruitment purposes, HR shared services, erasure requests and any questions or concerns regarding data protection received from other departments.

We are also required to share data with data controllers where we are acting as their data processors. This may involve (as examples) instances of where we have directly received any questions or complaints or erasure requests from any data controller clients.

Please note there may also be instances where we may need to share data with a competent law enforcement body, regulatory body, government agency, court, or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation or (ii) to exercise, establish or defend our legal rights.

## **International Data Transfers**

As mentioned above there may be instances where we may need to transfer your data outside the UK. We may need to share your data with other Cappfinity entities or companies who are in the European Economic Area (The EU member states, Norway, Iceland, and Liechtenstein), in an adequate listed country or in other third countries who may not have similar data protection laws to the UK. If we need to transfer your information outside the UK, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this notice.

## **Sub Processors**

There may be at times where we would need to utilise the help of third party vendors for various services, who may also process personal data of our client data controllers. A list of relevant sub-

processors is available at all times and can be found [here](#). We review and update this list as required and also ensure our agreements with these vendors cover the relevant data protection clauses.

## **Marketing Communications**

We would like to send you marketing news and updates regarding our company, products and services should you like to receive them. In order to send you these communications we require your consent, and you can always change your preferences (i.e. opt out) by clicking on the relevant unsubscribe link at the bottom of the email. You also have the ability to opt out by contacting us over phone should you chose to do so.

## **Cookies**

We use cookies on our websites and platforms. More information to cookies can be found in our cookie notices or cookie statements where applicable. You can also change your consent via the relevant cookie notice.

We use Hotjar for Strengths Profile only in order to better understand our users' needs and to optimise this service and experience. Hotjar is a technology service that helps us better understand our users' experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don't like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users' behaviour and their devices. This includes a device's IP address (processed during your session and stored in a de-identified form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), and the preferred language used to display our website. Hotjar stored this information on our behalf in a pseudonymised user profile. Hotjar is contractually forbidden to sell any of the data collected on our behalf.

For further details, please see the '[about Hotjar](#)' section of Hotjar's support site.

## **Automated Decision-Making**

Our platforms use algorithms to produce scores and feedback based on the answers you have provided to various questions. We do not utilise or rely on artificial intelligence ("AI") to carry out our services. The results from assessments are also used to produce reports as part of the assessment to help highlight strengths, weaknesses, and other areas of interest to you.

These assessment results and reports are carried out by non-human means and carried out electronically, however if you would like to discuss the results or to see if these results can be produced by non-automated means, you can contact us using our details above.

## **Data Retention**

We regularly review our data retention practices to ensure we only retain personal data for as long as necessary in line with our data processing activities. We have created data retention policies and accompanying data retention schedules to help document relevant retention periods.

As a data controller we will retain personal data for as long as necessary in line with various requirements, such as for example, best practice recommendations (e.g. ICO recommendations), relevant guidelines (e.g. ACAS guidance) or for as long as mandated under specific legislation (e.g. HMRC requirements). We will also determine appropriate retention periods based on our legitimate interests where identified.

As a data processor we will retain personal data for as long as required as set by our client data controllers. Where the data controller has determined the relevant retention period we will be sure to document this and notify them in advance before the deletion is carried out, normally within 30 days.

When data is needed to be deleted we will either delete manually or anonymise it if deletion is not possible.

## **What Happens If Our Business Changes Hands?**

We may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of our business. Any personal data that you have provided will, where it is relevant to any part of our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will be permitted to use that data only for the purposes for which it was originally collected by us, which can include marketing consents.

## **Data Security**

As a global organisation we take data security seriously, and we are ISO 27001 certified. We review this annually and copies of certifications can be made available upon request.

Our websites use HTTPS encryption (also referred to as SSL or TLS) on every one of its login interfaces. Our HTTPS implementation uses industry standard algorithms and certificates.

We host our product infrastructure with multi-tenant, outsourced infrastructure providers. The physical and environmental security controls are audited for SOC 2 Type III and ISO 27001 compliance, among other certifications, as per <https://learn.microsoft.com/en-us/azure/compliance/> and <https://aws.amazon.com/compliance/>.

If we become aware of any loss, misuse, alteration of personal data we will work closely with our IT team, DPO and other parties as necessary to investigate the incident at hand. We have the relevant procedure and policies in place to investigate, mitigate and report (when needed to relevant parties) such instances.

## **Data Protection Rights**

If you are based in the UK or EEA you have several Rights in relation to how an organisation processes your personal data. The Rights are as follows:

- Right to be informed
- Right to access data
- Right to rectification
- Right to erasure
- Right to restrict processing
- Right to objection
- Right to portability
- Right not to subject to automated decision making and profiling

If you would like to exercise any of the above Rights you can do so by sending us a written request to our email address mentioned above.

Please also note that if we receive a Rights request as a data processor, we will forward the request to the client controller who may then contact you directly for additional information or to confirm if the Right is exercised or not.

## **Concerns and Complaints**

We understand you may have concerns and complaints in relation to this notice and in relation to how we process personal data. If you would like to contact us directly to talk to us about a concern or to raise a complaint, you can do so by using our contact details above.

You can also submit a complaint directly to the ICO via this link <https://ico.org.uk/make-a-complaint/>. If you are based elsewhere within the European Economic Area a list of supervisory authorities can be found [here](#).

## **Review and Updates**

We will review this notice and make changes to it from time to time. We recommend that you check this notice to see where changes have been made and to ensure you are able to review updated information at all times.