

Cappfinity Global Privacy Notice

Last Reviewed Date: 17 August 2026

Version number: 4.1

Introduction

Cappfinity is a global talent technology company that helps employers identify, assess, develop, and deploy talent through a combination of psychology, data, and technology. Founded on the belief that people perform best when they are doing what they are good at and what they enjoy, Cappfinity supports organisations across recruitment, talent management, leadership development, and skills-based workforce planning.

Working with employers worldwide, Cappfinity provides assessment and talent solutions that help organisations understand individuals' skills, behaviours, motivations, and potential. Through its platforms and services, Cappfinity enables fair, evidence-based talent decisions while creating engaging and authentic experiences for candidates, employees, and clients.

More information about our company and history can be found on our website www.cappfinity.com

As we are headquartered in the United Kingdom (UK), we are registered with the Information Commissioner's Office (the ICO) with registration reference Z1879750.

This Notice describes the following:

- How your employer/prospective employer ("Employer"), and
- How Cappfinity Limited ("Cappfinity") (referred to as "We, "Our" or "Us")

uses your personal data collected through our products and services, or via other interactions with you. This Notice will also explain how the Employer and Cappfinity process your personal data, what personal data is collected, how it's used, why it's used, who it is shared with and what rights you have in respect of your personal data.

This Notice also applies to other websites, products and services owned and managed by Cappfinity:

- Preparation Hub (<https://hub.preparationplus.com/>)

The Employer as the Data Controller

Cappfinity collects your personal data on behalf of the Employer, who is the data controller in respect of your personal data. The Employer determines which assessments you take, what personal data is collected, the purposes of processing your personal data, who it's shared with and how long it is kept for. You can exercise your data protection rights directly to the Employer where this personal data is concerned by reviewing the Employer's Privacy Notice.

Personal Data Processed

To help you understand what personal data the Employer might collect when using our products to process your personal data, we have categorised each of our services below with the types of information commonly collected.

Please note these lists are not exhaustive, for more detailed information on the personal data processed by your employer/prospective employer, you should consult their own Privacy Notice.

➤ Candidate Assessments

- Full name
- Email address
- Account login information
- Job title/business area
- Your answers to the assessment questions set by the Employer
- Results data, this being the reported results of your assessment with scoring, however, the Employer may request this
- Video interviews
- Demographic information, such as age, gender, race/ethnicity, sexual orientation and country of residence
- Reasonable adjustment information which might include health data

➤ Applicant Tracking System (ATS)

- Full name and contact details
- Right to work information
- Employment history/qualifications
- Diversity/inclusion information
- Reasonable adjustment information
- Copies of identity documents
- CVs

➤ Proctoring Information

To help identify/prevent any deception when taking assessments online, we might collect and use the following information to pass on to your Employer:

- Use of copy/paste, or print screen function
- Moving to other websites during the assessment
- Pausing the time during an assessment
- Screen recordings if suspicious behaviour is noticed
- Detection of other people when completing an assessment
- Detection of the use of Artificial Intelligence (AI) through browsers or other devices during an assessment.

Websites: IP address, device type, unique device identification numbers, browser type, 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.

Employer Data Sharing

We will only share your Personal Information processed on behalf of the Employer with the Employer, and on the Employer’s instructions. Contact the Employer or see their Privacy Notice for more information about who they share your Personal Information with.

How we use Personal Data as a Processor

We will use your personal data for various activities on behalf of The Employer, which includes but is not limited to:

- Inviting you to complete an assessment
- Using your results data to compile a report for The Employer
- Evaluating your suitability for a role
- Providing our services to The Employer
- Comparing your assessment data and results data with Benchmark Data to provide talent analytics services to The Employer.
- Manage and administer our services.

The above list is non-exhaustive and representative. You should contact The Employer if you require more information about how and why your personal data is used.

Lawful Basis for Data Processing

The UK GDPR and EU GDPR require Cappfinity to identify appropriate lawful bases to process personal data.

As a data processor, we process personal data in line with the lawful basis determined by the Employer (data controller). If the Employer is relying on consent, we might facilitate the Employer’s collection of consent from you via our platforms.

The lawful basis we rely on as a data controller is detailed below, with brief examples for when they may apply:

Consent	For opting into marketing communications, newsletters, competitions, etc To process equality and diversity information about you, for our own analytical and validity purposes/to improve our assessments.
Contractual Obligation	To provide our Services to you
Legitimate Interests	To answer any questions or concerns that may be sent to us from individuals with whom we may have no prior existing relationship.

Automated Decision-Making

As part of the talent assessment and recruitment services we provide, Cappfinity may use automated processing to assess candidate responses and generate assessment results. These tools help organisations make fair, consistent, and evidence-based talent decisions by evaluating skills, behaviours, and other job-relevant criteria. Automated scoring methods are developed and overseen by qualified professionals and are designed to support objective assessment processes.

Where personal data is used in automated decision-making, Cappfinity is committed to ensuring transparency, fairness, and appropriate human oversight. Individuals will be informed when automated assessment processes are used and, where applicable, will be provided with information about how those processes affect them. Candidates may also have the right to request human review of an automated decision, to express their point of view, or to contest the outcome, in accordance with applicable data protection laws.

Cappfinity regularly reviews and validates its assessment methodologies to promote accuracy, fairness, and the avoidance of unlawful bias. Our assessment solutions are developed using established psychological and professional standards and are subject to ongoing monitoring and evaluation.

Where a client uses Cappfinity assessment results as part of its recruitment or talent processes, the client will make the final decision regarding an individual's application progression or development. Additional information about any specific automated decision-making activity and the safeguards that apply will be provided at the point of data collection or assessment.

We do not utilise or rely on artificial intelligence ("AI") to carry out our services.

These assessment results and reports are carried out electronically. If you would like to discuss or query the results, you can contact us using our details at the end of this Notice.

Data Sharing

We use organisations (sub-processors) when providing our services to you and The Employer; this means they will process your personal data on our behalf. Our third-party providers are carefully selected, going through a robust due diligence process to ensure they provide the same level of protection to personal data as we do – please see the Sub-Processor Notice on www.cappfinity.com

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

Your Personal Data may be accessed and/or processed outside of the UK. This is because some of the organisations we use to provide our services are based outside the UK.

We have taken appropriate steps to ensure that the Personal Data processed outside the UK has an essentially equivalent level of protection to that guaranteed in the UK. We do this by ensuring that:

- Your Personal Data is only processed in a country which the Secretary of State has confirmed has an adequate level of protection (an adequacy regulation, this includes certifying to the EU-US Data Privacy Framework (DPF), with the UK extension), or
- We enter into an International Data Transfer Agreement ("IDTA") with the receiving organisation and adopt supplementary measures, where necessary.

Marketing Communications

From time to time, with your consent, we may use your information to contact you with details about our products and services which we feel may be of interest to you. You have the right at any time to stop us from contacting you for marketing purposes. If you wish to exercise these rights, you can do so by following the 'unsubscribe' link on any emails received or contacting us using the contact details below.

Cookies

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

Data Retention

We have comprehensive data retention policies and accompanying data retention schedules, to help ensure personal data is not kept for longer than necessary. 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.

As a data processor, we will retain personal data for a period set by The Employer and ensure this is facilitated appropriately.

Data Security

As a global organisation, we take data security seriously and have implemented robust technical and organisational security measures to keep your personal data secure. We are ISO 27001 certified and review this annually, copies of certifications can be made available upon request. We are also Cyber Essentials Plus certified and review this annually, copies of certifications can be made available on request.

Our websites use HTTPS encryption (also referred to as SSL or TLS) on every one of their 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, or alteration of personal data, we will work closely with our IT team, Data Protection Officer (DPO) and other parties as necessary to investigate the incident and efficiently minimise the risk posed. We have comprehensive procedures 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** – You have the right to know what personal data we collect about you, how we use it, for what purpose and in accordance with which lawful basis, who we share it with and how long we keep it. We use our privacy notice to explain this.
- **Right of access** (commonly known as a “Subject Access Request”) - You have the right to receive a copy of the Personal Data we hold about you.
- **Right to rectification** - You have the right to have any incomplete or inaccurate information we hold about you corrected.
- **Right to erasure** (commonly known as the right to be forgotten) - You have the right to ask us to delete your Personal Data.
- **Right to object to processing** - You have the right to object to us processing your Personal Data. If you object to us using your Personal Data for marketing purposes, we will stop sending you marketing material.

- **Right to restrict processing** - You have the right to restrict our use of your Personal Data.
- **Right to portability** - You have the right to ask us to transfer your Personal Data to another party.
- **Automated decision-making** - You have the right not to be subject to a decision based solely on automated processing which will significantly affect you.
- **Right to withdraw consent** - If you have provided your consent for us to process your Personal Data for a specific purpose, you have the right to withdraw your consent at any time. If you do withdraw your consent, we will no longer process your information for the purpose(s) you originally agreed to, unless we are permitted by law to do so.
- **Right to lodge a complaint** - You have the right to lodge a complaint with the relevant supervisory authority if you are concerned about the way in which we are handling your Personal Data. The supervisory authority in the UK is the Information Commissioner's Office, which can be contacted online at:
[Contact us | ICO](#)

If you would like to exercise any of the above Rights, you can do so by sending us a written request to Cappfinity's Internal Data Protection email address mentioned below. Please note, if we receive a Rights request as a data processor, we will forward the request to the Employer (data controller), who will contact you directly to facilitate your request.

Complaints

You have the right to complain if you believe we have not complied with data protection law when handling your Personal Data. We will acknowledge receipt of your complaint within 30 days, investigate the matter without undue delay, and keep you informed of the progress and outcome. If you wish to complain, please use the contact details given below under "Contact Us". We will do our best to resolve the matter to your satisfaction.

If you are not satisfied with the outcome of your complaint, you can complain to the relevant supervisory authority. The supervisory authority in the UK is the Information Commissioner, who can be contacted online at: [Contact us | ICO](#), or by telephone on 0303 123 1113

For supervisory authorities in other countries within the EU, see the link below:
https://edpb.europa.eu/about-edpb/about-edpb/members_en

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.

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. 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.

Contact Us

If you would like to contact us directly to talk to us, you can do so by using our contact details below:

You can 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

Cappfinity's Internal Data Protection E-mail: dpo@cappfinity.com

We have offices in the UK, USA, Ireland and Australia, and details of these offices can be found on our website.

Cappfinity has appointed an external data protection officer (DPO), their details are as follows:

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

Website: www.evalian.co.uk

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

Review and Updates

We may update this notice (and any supplemental privacy notice) from time to time as shown below. We will notify you of the changes where required by applicable law.

Last Reviewed Date: 6 August 2026