

Facet5 – Privacy protection policy

Version 1.0 – May 2018

About this document

This privacy protection policy describes information that we collect, process, share, and store, including personal information, for use within the Facet5 applications and any related services (collectively, the "Services").

In this Privacy Policy the terms "Facet5", "we", "us" and "our" refers to Facet5 and its affiliates.

The Services are intended for use by employees and hired workers of organisations and in accordance with the organisations' instructions. You are using the Services on an account issued to your employer or another organisation (your "Organisation"), that Organisation is likely to have its own policies regarding storage, access, modification, deletion and retention of information that you submit or provide through the Services. This means that your Organisation has the right to (i) control and administer personal data on a dedicated Facet5 account ("An Account") and (ii) access and process any data that you submit or provide through the Services, including, for example, your questionnaire results and communications.

Your Organisation is the data controller. Facet5 is the data processor, processing your personal data, including any personal data you provide by using the Services, on behalf of your Organisation or on request of your Organisation.

Please contact your Organisation with any privacy enquiries regarding policies, including any enterprise agreements with Facet5, regarding your use of the Services. Complaints may be sent to your Organisation or to the Information Commissioners Office. Please refer below for full contact details.

If you have any enquiries regarding this privacy protection policy document, and the personal data processed as part of the Services, you may contact us at datasecurity@facet5global.com

Principles

Facet5 is committed to protecting your privacy and developing technology that gives you the most powerful and safe online experience.

By using the Services, you consent to the data practices described in this document, and you agree to allow us to collect and process information as described below.

Purpose – why we process the data

We rely on the collection of personal information to enable Facet5 Ltd to identify you for the creation of computer generated summary reports for purposes such as assessment, team building, development, coaching, and selection on behalf of your Organisation.

It is important that you read this, as you by taking the Services into use, gives us and your employer, your consent to process your personal data for the said purpose.

Legal basis for the processing

The legal basis for the processing of personal data is your consent and the data protection law. Part of the processing is required in order to fulfil the agreement we have with your Organisation.

Your personal data is processed in accordance with the applicable European Personal Data Act and the Personal Data Regulations, which from 25 May 2018 will include the European Union (EU) Directive on the Processing of Personal Data from 1995 (DIRECTIVE 95/46/EC). This give you strong rights as a data subject. Hereunder you have the right to request for:

- Access to your personal data.
- Rectification or erasure the personal data.
- Portability of your data, extracting the personal data for transferring it to other service providers.

Submitting your personal data is voluntary and you have the right to restrict our use of the personal data, but some basic information is needed to enable Services to operate.

What data we collect

Facet5 stores information which is provided by yourself or your company when you are registered and records that are generated when you use the service.

We collect:

- Contact information, such as Surname, Givenname and email address
- Your responses to a Facet5 Personality Questionnaire, TorQ Assessment, TeamScape360 Questionnaire or Strategic Leadership Review
- Your responses in relation to a review of another person or their review of you
- The information mentioned above is either provided by you or your activity using the Services, or information we receive from your Organisation.

How we use your data

The information we collect is also used to provide, develop and improve the Services, including information necessary to improve our service and security features. Your Organisation may use your contact details to send you information, or to ask you to

participate in surveys about their Services or to obtain permission for the use of your personal data outside of the scope of this policy.

We may also use this information in an aggregated, non-identified form for research purposes and to assist in ensuring the ongoing reliability and validity of our Services.

We use industry-standard methods to keep this information safe and secure while it is transmitted over your network connection and through the Internet to our servers located in the United Kingdom.

Where we process your data

The personal data we collect from you is stored and processed on our servers in the United Kingdom, under European Data Security and Privacy laws.

Disclosure of information

Facet5 does not share personal information for any commercial or marketing purpose unrelated to the delivery of Facet5 products and services. The personal information will to some extent be shared with your organisation as part the purpose of the Services.

The following are the limited situations where we may share personal information:

1. With your explicit consent: We may share personal information when we have your consent, for example providing certification information to a third party on your request.
2. Your personal information may be collected, processed and stored by Facet5 or its service providers within the European Union, the EEA, or locations regulated by EU style privacy regulations. As a result, your personal information may be subject to legal requirements, including lawful requirements to disclose personal information to government authorities, in those jurisdictions.
3. Legal requests: If we receive a subpoena, warrant, discovery order or other request or order from a law enforcement agency, court, other governmental entity or litigant that seeks data relating to the Services, we will make reasonable attempts to direct the requesting party to seek the data directly from your Organisation. If we ask the requesting party to direct the request to the Organisation, we will provide your Organisation's contact information to the requesting party. If legally compelled to produce information and unless legally prohibited, we will use reasonable efforts to notify your Organisation so that they can notify you pursuant to your Organisation's policies and as permitted by law. We will direct any requests for information under data protection laws to your Organisation, unless prohibited by law.
4. Aggregate or de-identified data. We may share *non-personal* information (for example, aggregated or anonymized customer and client records), to improve, support and operate Facet5 software, products and services, and to create and distribute reports regarding use of such products and services. We take all steps to keep this non-personal information from being associated with you or your Organisation.

Safety and security

We use the information that we have to help verify accounts and activity and to promote safety and security on and off our Services on your Organisation's behalf, such as by investigating suspicious activity or violations of our terms or policies. We work hard to protect your data using a team of system and security personnel, automated systems and advanced technology such as encryption and machine learning.

Accessing and modifying your information

You may access the information held on you by your Organisation, and as such may correct or delete information that you have provided. You should contact your Organisation directly to access or modify your information. You can find the representative of the organisation who issued the questionnaire or review in the invitation email or at the bottom of the Questionnaire welcome screen. You may also direct your initial request to Datasecurity@facet5global.com. Your details will be forwarded to the appropriate organisation for actioning.

Right to Restrict and Delete Data

If you would like to restrict the processing or delete your personal data, you should contact your Organisation. All enquiries and requests will be direct to your Organisation as the Data Controller.

It typically takes up to 30 days to delete data on behalf of your Organisation after a request has been made, but some information may remain in backup copies for a reasonable period of time as directed by your Organisation.

How long we store your information

Facet5 generally stores your personal information on Facet5's servers for as long as you or your Organisation remains a Facet5 customer. To the extent there are legal requirements for duration of storage, such as for accounting purposes, we may store identified personal data for up to 5 years or under the direction of your Organisation.

As described above you have the right to request for the data to be deleted.

Who Will Have Access to Your Personal Information

Information held by Facet5 Ltd is available only to the specific authorised practitioners within your Organisation. The information cannot be supplied to any other Organisation or body. We will not release your personal information to another party without your written permission, except where required by law or relevant professional codes of ethics. Authorised personnel from Facet5 Ltd may access your information at the request of your Organisation or yourself to support the delivery of our Services.

Changes to our Privacy protection policy

We may update this Privacy protection policy from time to time. When we update the Privacy protection policy, you will be asked to accept the new version of the Privacy protection policy the next time you use our Services.

For further information you can contact using the following information:

Facet5 Global

17 Dashwood House
69 Old Broad Street
London, EC2M 1QS
United Kingdom
Tel: +44 (0)20 7786 3547
Email: Datasecurity@facet5global.com

Information Commissioners Office Wycliffe House

Water Lane, Wilmslow
Cheshire SK9 5AF
Tel: +44 (0)303 123 1113 (local rate) or +44 (0) 1625 545 745 if you prefer to use a national rate number