

## Humanostics Privacy Policy

Last updated February 24<sup>th</sup>, 2020.

Humanostics ensures that the Personal Data we process is handled with the utmost care and with a high level of confidentiality. We use personal data only in accordance with its intended use and do not sell or otherwise share personal data with third parties in any way except as legally required by government institutions. This privacy policy describes how data is being handled and which precautions we have established, in terms of usage, security, transparency of processes, etc.

This document covers the personal data we handle in our role as data controller (we own the data because we instigated the collection) as well as in our role as data processor (we process personal data on behalf of others), but also how we ensure that data subjects and other data processors are interacted with in accordance with the General Data Protection Regulation and professional standards.

The term “Personal Data” is in the following defined as data which identifies, or may identify, an individual.

This privacy policy is available to everybody on our website and by request, regardless of the status or (contractual) relationship between Humanostics and the inquirer.

The security measures described in the following under “Humanostics as Data Controller” are valid and applicable also in the section “Humanostics as Data Processor”. The technical routines and standards described in the section “Humanostics as Data Processor” are applicable in our capacity as a data processor when processing PI assessment data on behalf of our clients via the online assessment systems provided by The Predictive Index, LLC.

### **Humanostics’ Role as a Data Sub-processor:**

Humanostics acts as a sub-processor of The Predictive Index, LLC, in connection with client data administered in the assessment software(s) delivered by The Predictive Index, the Data Processor for such client data. Hence, the Privacy Policy of Humanostics as a sub-processor includes only those areas where Humanostics is in touch with the data exported by the Data Controller and transferred through the Data Processor. For information on the security of the processing of Personal Data, we refer to the Privacy Policy of The Predictive Index (<https://www.predictiveindex.com/privacy>), and their relevant sub-processors. It is the responsibility of the Data Controller to make sure you as a data subject are informed about, and have given your consent to, the processing of your personal data. Humanostics informs all clients of this responsibility and assists them in any way to comply with this and any other applicable law(s), regulations and/or professional and ethical standards.

Humanostics has a written agreement with the Data Processor, The Predictive Index, governing the processing of data.

The role as a sub-processor means that Humanostics will process data only to the extent requested by the Data Controller. Under no circumstances will we process data for any other purpose than those described in the Data Processing Agreement between The Predictive Index and the Data Controller/Owner. If the Data Controller grants access to Humanostics, Humanostics will gain access to the data exported by the Data Controller. The processing of personal data, which can be processed by Humanostics, will occur only through the system(s) in which the personal data is already stored, and will not add any additional sub-processors, reduce security measures, or in any way increase exposure of the personal data, than already stated in the Data Processing Agreement.

### **Humanostics’ Role as a Data Controller:**

Humanostics is the Data Controller/Owner only in situations where Humanostics sends out assessments on behalf of itself, and when collecting and keeping the personal data of employees, prospects, and clients.

The personal data for non-employees and non-clients of Humanostics is kept for a period of 12 months, after which it is anonymised, unless an active discussion is still in progress, for which Humanostics assesses it helpful for

both parties to keep this data. Humanostics will at all times comply with a request to have personal data anonymised, regardless of the reason of the person making this request.

The personal data related to the assessments is stored in the system(s) of The Predictive Index, acting as a Data Processor. The data is not used for any other purpose than agreed with the data subject. This may include, but is not limited to, job interviews, preparatory work related to a workshop and demonstration of the assessments to prospects.

The personal data of employees, prospects, and clients is accessible only to relevant people. Relevant people are in this context defined as individuals who need access to the data in order to enable Humanostics to perform their duties in the respective relationship. These may include an individual responsible for paying salaries to employees, an individual responsible for renewing contracts, an individual preparing a sales presentation for prospects etc. We are always ready to provide 1) information on which personal data is kept for any individual, and 2) a list of individuals who have access to this data as well as the reason these individuals are considered relevant for this purpose when requested, provided that such requests are made by an individual authorised to receive this information. The personal data for clients and employees is kept for as long as the contractual relationship exists, and anonymised immediately after the relationship is terminated, unless Humanostics is legally required to maintain data by government authorities.

Any physical documents containing personal data is safely locked in and is kept at Humanostics' office in order to ensure no irrelevant individuals have access to this. The digital information, if not stored in the system(s) of The Predictive Index and/or any sub-processor, is secured by a password in addition to being on machines physically locked away. The digital information is backed up every week, and the external hard disc is disconnected as soon as the back-up process is completed.

In cases where the personal data of either employees or clients are processed by a sub-processor, Humanostics uses only sub-processors who comply with the same level of security and confidentiality as Humanostics does. We are always ready to provide a full list of sub-processors when requested.

The personal data of our clients is used solely for the purpose for which it is provided. This includes, but is not limited to, workshop enrolment, signing of contracts, registration for newsletters etc.

The Humanostics staff is instructed to handle all personal data confidentially, and not to discuss or display this to anyone. Only the relevant individuals, as described above, will have access to personal data and will not distribute the data under any circumstance.

If Humanostics discovers any breach of this policy, the Data Processing Agreement between the Data Controller (the client) and the Data Processor (The Predictive Index) or the Privacy Policy of the Data Controller, Humanostics will inform all affected parties as soon as possible. This includes, but is not limited to, hackers, unauthorised loss, processing, alteration or destruction of personal data, and the data controllers, processors and/or sub-processors' failure to comply with applicable law(s), respective agreements or privacy policies. In these cases, Humanostics will provide the affected parties with 1) a detailed description of the severity of the breach, 2) contact information on the party/parties responsible for the data protection in the affected area(s) as well as the party/parties affected by the breach, 3) potential consequences of the breach and 4) a description of the measures the responsible party/parties must take, and/or measures already have taken, in order to limit the adverse effects of the breach.

This privacy policy is updated whenever deemed necessary or beneficial by Humanostics, provided that this/these update(s) do not reduce any security measures, confidentiality or constitutes a potential breach with applicable law. Any suggested change to the privacy policy is happily received and assessed by Humanostics.

#### **Cookie Policy:**

A cookie is a small text file that the website stores on your computer. Cookies are not dangerous. They are, among other things, necessary for you to use the technical possibilities available on our website. A cookie does not identify you personally but the computer, smartphone or tablet you use. Our first-party cookies are stored for a maximum of 30 days on your computer, smartphone or tablet but can be deleted by you at any time.

Humanostics.com uses first- and third-party cookies, including both technical and statistical cookies. First-party cookies are the cookies stored on your computer, smartphone or tablet by humanostics.com. Among other things, humanostics.com uses technical and statistical cookies to remember your personal preferences and preferences and to collect statistics on the general use of the website that we can use to optimise the content and technical features. We use Google Analytics, which stores statistical cookies to collect visitor traffic data on humanostics.com for the purpose of analysing the use of the website. The data collected through Google Analytics is anonymous and cannot be used to identify you personally.

The vast majority of browsers can be set to either not accept cookies at all or to only accept certain cookies. If you do not want humanostics.com to put cookies on your computer, you can either refuse the use of cookies when you first access our website or set your browser not to accept cookies from our domain. Under cookie settings in your browser, it is also possible to delete cookies that may already have been saved from your previous visits to our website.



*Jesper Præstengaard, Managing Partner*