RECOMMENDED PROCESS FOR PI DATA PROCESSING



ONE-TIME SETUP

STEP 1: SORT AND CATEGORISE YOUR DATA

Go through your data and ensure that every individual is categorised correctly as either 'Candidate', 'Employee' or 'Other'.

STEP 2: SET UP AUTOMATIC ANONYMISATION

In the Administration module, go to Company Settings. In the section Anonymize People Data, choose Bulk anonymize by type in the drop-down menu. Tick all four boxes, then choose 'Every Day' in the drop-down menu under How often?. Below, select the number of days you would like to keep candidate data before it is anonymised by the software (this time period should correspond with your data privacy policy). Click Anonymize Records – not that this action cannot be undone, and anonymised data cannot be restored.

STEP 3: INSERT A STANDARD E-MAIL TEXT OR ENABLE CONSENT

In the Administration module, go to Company Settings. In the section Software Email Settings, choose Take the Behavioral Assessment. Insert a text with a link to your privacy policy and click Save. Repeat the process for each of the email languages you use. Then choose the email Take the Cognitive Assessment at the top and insert the text in each of the email languages you use. Alternatively, you can choose to enable the consent function for behavioral assessments under Assessment Settings and add a text with a link to your privacy policy here. This text will be shown for all behavioral assessments.

ONGOING PROCESS

HIRING AND ONBOARDING

When sending out assessments for a recruitment, categorise all candidates as 'Candidate' in PI Software. When you hire someone, remember to change their status to 'Employee' so their data is not anonymised automatically by the software.

OFFBOARDING EMPLOYEES

When an employee has left your company, remember to change their status from Employee to Other in the software.

PI SOFTWARE USERS

Ensure that your software users only have access to data that is relevant for them by sorting data in folders and subfolders and restricting access to relevant folders. Note that users with the roles AccountAdmins and AccountOwners always have access to all folders. Never store data in the root folder with your company name as all users always have access to this folder. When a software user leaves your company, disable their access to PI Software. Software super users should ensure that all software users are aware of how your anonymisation process is set up and adhere to the process described above.



ABOUT THE GDPR AND DATA PROCESSING



ABOUT THE GDPR

- GDPR stands for General Data Protection Regulation.
- It is a European Union law that requires businesses to protect the personal data and privacy of individuals living in the EU.
- The GDPR also regulates the exportation of personal data outside the EU.
- The data stored in PI Software is considered personal data, but not sensitive personal data.

PARTIES

- The Predictive Index is the main Data Processor
- Humanostics are a Data Sub-Processor as your PI Certified Partner
- Your company is the Data Controller
- A data processor agreement (DPA) between the Data Processor (The Predictive Index) and the Data Controller (you) should be signed – contact us for more information.

OBLIGATIONS

- You are obligated to develop an appropriate data/privacy policy, including:
- Determine how long you will store Plrelated data.
- Inform candidates and employees that you are storing their data, how long you will be doing so and for what purpose.
- Set up a process to anonymise data, when the defined storage period has expired.
- PI Software can be set up to anonymise data automatically.



You are always welcome to <u>contact Humanostics</u> for guidance on GDPR compliance, and we advise you to seek professional legal counsel as well.