

PROPHET

Predictive Role Profiling for
High-Performing Executive Teams

PROPHET Privacy Notice

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PROPHET Profiling Ltd.'s Privacy Notice

Last updated: December 2019

This is the Privacy Notice of PROPHET Profiling, a company registered in England and Wales (registered number 03665491) whose registered offices are at:

PROPHET Profiling
411 – 413 Oxford Street
London
UK
W1C 2PE

Please contact us by e-mail: prophet@prophetprofiling.com or telephone: +44 (0)207 440 3000.

PROPHET Profiling Ltd. (PROPHET) is committed to protecting and respecting the privacy of all with whom we interact and to acting in compliance with the UK Data Protection Act 2018 (ICO Data Controller registration number Z8910301) and applicable regulations, including European General Data Protection Regulation. This document explains how PROPHET collects, uses and processes the data that people give, either as a business interaction with PROPHET or as a respondent of the PROPHET questionnaire.

Your Rights

If you reside in the European Union, you have the right under the General Data Protection Regulation:

1. To be informed about our processing of your personal data
2. To have your personal data corrected if it is inaccurate and to have incomplete personal data completed
3. To object to processing of your personal data
4. To restrict of processing of your personal data
5. To have your personal data erased (the “right to be forgotten”)
6. To request access to your personal data and information about how we process it
7. To move, copy or transfer your personal data (“data portability”)
8. Not to have your data used for solely automated decision making, including profiling, that would have a legal or similarly significant effect on you.

You have the right to lodge a complaint with supervisory authority – the Information Commissioner's Office (ICO). It has enforcement powers and can investigate compliance with data protection law.

Help line: 0303 123 1113.

Website: <https://ico.org.uk>

By post:

Customer Contact
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
SK9 5AF

What is personal data; what and who is involved in the processing of personal data?

Personal data is all kinds of information that can be directly or indirectly applied to a living person. The processing of personal data is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaption or alteration, retrieval, consultation, use etc. Involved in the processing of the data are:

- The Data Controller – Determines the purposes and means of the processing of personal data
- The Data Processor – Processes personal data on behalf of the Data Controller
- Sub Processors – Processes personal data on behalf of the Data Processor

Who is responsible for the personal data PROPHET collects?

If you have been asked to complete the PROPHET Questionnaire by:

- your employer organisation or another organisation with whom you are working, or
- by a professional coach or consultant who is an accredited / Certified User of PROPHET

they / their organisation will be the Data Controller of certain personal data and reports relating to you.

PROPHET Profiling is the Data Processor of this data; we collect and store this information in accordance with the Data Controller's instructions. This data is associated with the production of PROPHET Profiles and Reports and any other insight reports and services that the Data Controller conducts as part of its work with you. PROPHET works with specialist Sub-Processors, all of which are UK-based, to support in the processing of PROPHET Profiles and Reports.

Details of the personal data PROPHET may collect from you

The data that PROPHET collects from you may include:

- Personal information, including name and other non-mandatory background information, such as gender, age bracket, region, seniority and industry.
- Information you provide when you complete forms on our site, or complete the PROPHET questionnaire, or when ordering PROPHET products and services, including registering to use one of PROPHET's sites, subscribing to services, posting material or using further services, including information provided when a respondent completed the PROPHET questionnaire.
- Information you submit when you take part in a promotion run by PROPHET.
- Information provided when you contact us or report a problem to us; or complete a survey that we use for research purposes.
- Data about your visits to a PROPHET site (including traffic data, location data, logs and other communication data whether this is required for our billing purposes or otherwise) and the resources that you access.
- The personal sensitive data (of which only ethnicity is relevant to what PROPHET collects) is only collected to conduct statistical academic studies required by the British Psychological Society (BPS) in order to ensure fairness and suitability of the instrument for use, regardless of gender or race. This is only done in the UK, as the BPS is a UK body and is accepted best practice in the UK. PROPHET does not collect ethnicity data from respondents in any other country and it is only used for this purpose. This data is anonymised before the data is used for studies submitted to the BPS. No consent is required for these studies because the data used for these studies is anonymised and not attributable to any person.

How PROPHET uses data

Any personal data that we collect is used:

- To provide users with the products and services that they request from PROPHET.
- For mailing information to corporate HR (or similar), coach accredited users or potential users about our other products and services in which they may be interested, including PROPHET's catalogue, insight articles, press and newsletters, and, where relevant, information on organisations with which we are in partnership for the purpose of delivery or development of PROPHET (for example, Wisdom8).
- To provide, on request, personalised computer-generated reports from completion of our psychometric instrument questionnaires.
- For customer administration including carrying out our obligations arising from any contracts entered between your Organisation and us and including retention of correspondence if you contact us.
- To personalise the service to you, including ensuring that content from our site is presented in the most effective manner for you and your computer.
- To seek feedback or views on products and services.
- To enable you to participate in interactive features of our service, when you choose to do so, including for example webinars.

- For technical administration of our sites including notifying you about changes to PROPHET's service.
- For research purposes, through completion of our psychometric instrument questionnaires in order to produce statistics of the type described in our technical product manuals, e.g. psychometric norms, reliability and validity data, as part of BPS registration of PROPHET. Only data in anonymised and aggregated form will only be used for research purposes; this data is not personally identifiable.

Lawful basis for processing

This section covers what used to be called 'conditions for processing' under the Data Protection Act 2018.

Consent is the responsibility of the Data Controller.

To avoid ambiguity over the legal basis for processing your data, PROPHET seeks consent before a respondent is able to complete the Questionnaire. PROPHET will not allow the individual to complete the Questionnaire unless they consent. If consent is withheld, next steps are the responsibility of the Data Controller (typically the organisation or Accredited user asking the individual to complete PROPHET).

PROPHET advises organisations never to mandate someone to complete PROPHET against their will, as the results are likely to be compromised and therefore meaningless, as the individual may not have completed the questions accurately or in good faith. As PROPHET is intended to support people in their development and relationships at work – this therefore would work against the purpose of the development initiative. PROPHET advises organisations to encourage the respondent to complete the exercise only if they are willing and open to the development initiative. In instances where they are unwilling, it may be that the individual does not like psychometric instruments, or it may be that they do not trust the organisation to do the right thing by their data. This is a matter for the Data Controller Organisation and the respondent.

See below screenshot of the consent request statement provided by PROPHET:

PROPHET is committed to a policy of equality. In order to ensure that our questionnaires are fair to people from all groups, and for that purpose only, we ask you to complete the following monitoring questions. This is in accord with the Equality Act (2010) and in line with the guidance on best practice of the Equality and Human Rights Commission. All the monitoring information collected is treated in absolute confidence and in line with the 2018 Data Protection Act. You may choose not to answer any of these questions if you prefer not to.

To view PROPHET's Data and Privacy Policies, please click on the following link:

[PROPHET's Data and Privacy Policies](#)

- I consent for the data I submit to be used in the production of my PROPHET Individual Profile and, if relevant, team or group reports for the purpose of development.
- I do not consent.

In the event that you decline to consent, please contact the Accredited user who invited you to complete PROPHET to discuss next steps.

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Who data may be shared with

We will not disclose your personal information to third parties except:

- As necessary to fulfil order(s) for our products and services specified by the Data Controller
- To validate your payment details, if required
- To suppliers and licensors that process data on our behalf (Sub-Processors)
- In the event that we sell or buy any business or assets, including selling our business or assets and with permission from the Data Controller
- Where we believe, in good faith, that it is necessary to comply with the law or regulatory obligation or to protect the safety of PROPHET, our customers or their clients, or the public, or to enforce or apply our terms of business or our terms and conditions of use of our site or other contracts. This may include exchanging information with other companies or organizations for the purposes of fraud protection and credit risk reduction.

All processing of PROPHET currently takes place in the UK.

We may also disclose aggregated and anonymised information for marketing, product development, strategic or research purposes. In such data, no individual is identified or identifiable from such data.

Data that is transferred in the course of PROPHET's business issuing Profiles and Reports is transferred safely and lawfully, with the appropriate safeguards. Profiles and Reports are either sent via a password protected link; Reports may be sent in hard copy format, via post; or sending an encrypted password by email via Microsoft Outlook, for the recipient to access a PDF report.

Cookies

'Cookies' are pieces of information in the form of small text files stored by a user's web browser on your hard drive, when people visit websites. Cookies help to identify the user when they visit a web page; this enables the website to work more efficiently and for the visit to be personalised, for example, to simplify the login process for registered users. Cookies also provide information to the owner of the site. Cookies collect information about internet users such as their names, addresses, email details, passwords and user preferences.

PROPHET's corporate and questionnaire websites, as with most major websites, use cookies, but it is possible to restrict cookies or withdraw consent to use by blocking the cookies which are set by us by turning off the cookie function (see the Help menu on your browser for details). However, by doing so, this may restrict the services you can use or PROPHET's site may not work for you as well as we intend or at all. There is more information about cookies at www.aboutcookies.org where one may also find information on how to delete cookies from your device.

The PROPHET Reporting sites (prophet-profile.com; manager.prophet-profile.com) use cookies in the same way. They use Session Cookies to keep the current user logged in. Because PROPHET uses only internal systems and grants access to known people via passwords, we already know everything we need to know about our visitors before they are granted access, so therefore we don't need to use any tracking or analytical cookies. Session cookies do not pull any information through such as IP addresses or browser information. The system uses the information received from the cookies to enable the browser to maintain state. Cookie information is never shared with any third parties.

The site used for respondents to complete the PROPHET Questionnaire, prophet-questionnaire.com does not use cookies, as there is an option to save and come back at a later point to the responses of the questionnaire.

PROPHET prophetprofiling.com uses analytical and functionality cookies to allow us to recognise and count the number of visitors to our site and to see how visitors use the site, to enable us to improve how PROPHET sites work. We use Google Analytics to collect information about visitor behaviour on our website. Google Analytics stores information about what pages you visit, how long you are on the site, how you got there and what you click on. You can find out more about Google's position on privacy as regards to its analytics service at: <https://support.google.com/analytics/answer/6004245?hl=en>.

The right to opt out of direct communications

PROPHET only sends marketing communications to existing or potential accredited users (i.e. either coaches associated with the Wisdom8 network or HR or L&D professionals who may be suitable for accreditation). For those who do not wish PROPHET to use personal data for direct marketing of our products and services, they can unsubscribe using the link in any email received from PROPHET or you can notify PROPHET in writing either by email to prophet@prophetprofiling.com or by letter (see how you can contact us).

Please note, however, that occasionally PROPHET may need to communicate with individuals for administrative or operational reasons (service notices).

Retention of personal data

The following criteria are used to determine data retention periods for your personal data:

- The retention period stipulated by the Data Controller.
- Where PROPHET is the Data Controller, we retain response data (to the PROPHET Questionnaire) for a 6-year period which begins after the termination of the relationship or contract between either PROPHET and the client.
- We will retain technical information about your visits to PROPHET websites for 12 months.

Children

We request individuals under 18 do not provide personal data to PROPHET. If we learn that we have collected the personal data from a child under 18, we will take steps to delete the information as soon as possible.

Security

We have implemented appropriate security measures to maintain the confidentiality of all personal information in our custody and control, including only providing access to personal information to employees and authorised service providers who require such information for the purposes described in this document.

To provide you with an increased level of security online, access to your personal information on certain of our websites may be protected with a password. We strongly recommend that you do not disclose your password to anyone.

We will never ask you for your password in any unsolicited communication.

Privacy Policy Updates

We may update this Privacy Policy from time to time as we add new products and apps, as we improve our current offerings and as technologies and laws change. You can determine when this Privacy Policy was last revised by referring to the “Last updated” legend at the top of this page. Any changes will become effective upon our posting of the revised Privacy Policy.

We will provide notice to you if these changes are material and, where required by applicable law, we will obtain your consent. This notice will be provided by email or by posting notice of the changes on the PROPHET websites and apps that link to this Privacy Policy.

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PROPHET Profiling
411-413 Oxford Street, London W1C 2PE
+44 (0)20 7440 3000