

# Sova Assessment Limited Privacy Notice

This Privacy Notice is made available for the benefit of the categories of individuals defined below. If you are a candidate (i.e., a person undertaking a Sova questionnaire) please see Sova's Candidate Privacy Notice.

## Prospective clients/customers

- any individual representing a client who Sova Assessment are in discussions with regarding a potential contractual relationship.

## Clients/customers

- any individual representing a client who Sova Assessment are currently working with on a contractual basis and who instructs Sova on behalf of that client.

## Sub-contractors

- any individual who provides work on behalf of Sova Assessment.

## Suppliers

- any individual/company who provides products and services direct to Sova Assessment.

## Sova Assessment website users

- any individual who accesses the Sova Assessment website.

**Data Protection Legislation** means the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 (DPA 2018), the Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR) and all other applicable UK data protection legislation in force from time to time together with, the EU General Data Protection Regulation (EU GDPR) 2016/679) and all other EU data protection legislation in force from time to time.

The UK GDPR is very similar to the EU GDPR. In this procedure reference to the sole “GDPR” means both the “UK GDPR” and the “EU GDPR”.

## 1. INTRODUCTION

Sova Assessment is committed to acting in compliance with current Data Protection Legislation and therefore, to protecting your privacy.

This Privacy Notice sets out how we process data, and includes:

- our status, for the purposes of Data Protection Legislation.
- the scope and who the notice covers in terms of personal data.
- who we are and who to contact.
- the personal data that we collect and hold on you.
- how we collect this data.
- how we store and use personal data.
- our legal bases for processing your personal data.

- information on transfers to third parties and international transfers.
- your rights as a data subject.

## 2. DATA PROCESSOR AND DATA CONTROLLER RELATIONSHIP

For the purpose of Data Protection Legislation, Sova Assessment acts as both a Data Processor and a Data Controller. Where we act as a Data Processor, this means that Sova processes your personal data on the instructions of you. Where we act as a Data Controller, this means that Sova determines the purpose for why your personal data is to be used.

### **Individuals representing prospective clients/customers.**

- Sova Assessment acts as the Data Controller.

### **Individuals representing clients/customers.**

- Sova Assessment acts as the Data Controller.

### **Individuals representing sub-contractors.**

- Sova Assessment acts as the Data Controller.

### **Individuals representing suppliers.**

- Sova Assessment acts as the Data Controller.

### **Sova Assessment website users.**

- Sova Assessment acts as the Data Controller.

## Candidates (individuals undertaking a Sova Assessment questionnaire).

- Sova Assessment acts as the Data Processor – please see Sova’s Candidate Privacy Notice.

### 3. WHO WE ARE AND WHO TO CONTACT

#### 3.1 Who we are

We are Sova Assessment Limited, a company registered in England whose registered office is at Sterling House, 19/23 High Street, Kidlington, Oxfordshire, England, OX5 2DH.

We are online assessment specialists whose aim is to help employers make accurate and informed decisions; and ensure assessments deliver the best possible experience for candidates. We provide digital assessment solutions, talent management consultancy services alongside a range of bespoke training solutions.

#### 3.2 Responsibilities

At Sova Assessment we have a Data Protection representative who is responsible within our business for ensuring that this notice is made available to all individuals prior to Sova Assessment collecting/processing their personal data.

Our Data Protection representatives can be contacted directly here, using the below contact information.

- [compliance@sovaassessment.com](mailto:compliance@sovaassessment.com)
- 0207 947 4330

Sova Assessment has contracted the services of GRCI Law to act as its Data Protection Officer (DPO). Accordingly, Sova Assessment will seek advice, guidance and input from the DPO where necessary.

#### 4. WHAT PERSONAL DATA WE PROCESS AND THE BASIS FOR PROCESSING IT

The below table illustrates the personal data we process on each category of individuals, for what purpose and the legal basis for processing this data.

##### Prospective clients/customers

Personal data type:	Source:	Purpose:	Legal basis:
Client (company) name	You - during initial contact/communications.	To enable us to respond to your enquiry	Performance of a contract
Client contacts/points of reference, including name, email address, contact number and job title	You - during initial contact/communications.	To enable us to respond to your enquiry	Performance of a contract
Products and services you are interested in	You - during initial contact/communications.	To enable us to respond to your enquiry	Performance of a contract
Marketing data	You - during initial contact/communications.	To manage your preferences in relation to how we communicate with you.	Consent

Clients/customers

<b>Personal data type:</b>	<b>Source:</b>	<b>Purpose:</b>	<b>Legal basis:</b>
Client Name, address, and registered company number	You - during contract negotiations.	To enter into a contract with you as our client.	Performance of a contract
Client contacts/points of reference, including name, email address, contact number and job title	<p>You – during contract negotiations.</p> <p>Data may also be collected during commencement of additional projects.</p>	<p>For administration purposes – to ensure we have a central point of contact during our business relationship.</p> <p>For administration purposes – to ensure we keep you updated about changes to our products and services.</p>	Performance of a contract

		Data will also be collected to administer to you a computer-generated invitation which will allow you access to the Sova online platform.	
Products and services you have purchased from us	You – during contract negotiations.  Data may also be collected during commencement of additional projects.	To manage our ongoing business relationship with you.	Performance of a contract
Special terms relating to products and services you have purchased from us	You – during contract negotiations.	For administration purposes – to ensure projects are	Performance of a contract

	Data may also be collected during commencement of additional projects.	managed in the way you have requested.	
Feedback on the products and services provided to you	You – during the completion of a project.	To manage our ongoing business relationship with you and to ensure our products and services can be improved.	Performance of a contract
Financial details, such as a PO number	You - during commencement of a project.	To facilitate the smooth operation of payment.	Performance of a contract
Marketing data	You – during contract negotiations.  Data may also be collected during commencement of additional projects.	To manage your preferences in relation to how we communicate with you.	Legitimate Interests

Username or similar identifier	Automatically generated from our online assessment platform	To administer to you a computer-generated invitation which will allow you access to the Sova online platform.	Legitimate Interests
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### Sub-contractors (Associates working on behalf of Sova)

<b>Personal data type:</b>	<b>Source:</b>	<b>Purpose:</b>	<b>Legal basis:</b>
Name, email address and contact number	You - when we begin initial communications regarding partnership.  Data may also be collected during contract negotiations.	To enter into a contract with you.	Performance of a contract
Company address, registration number and VAT, or TI (Tax Identification) number	You – during contract negotiations and/or submission of request for payment for services.	To enter into a contract with you.	Legal obligation

Insurance Information	You - when we begin initial communications regarding partnership.	To enter into a contract with you.	Performance of a contract
Fees	You - when we begin initial communications regarding partnership.  Data may also be collected during contract negotiations.	To enter into a contract with you.	Performance of a contract
Bank details	You - when we begin initial communications regarding partnership.  Data may also be collected during contract negotiations.	To facilitate payment for the products and services provided by you.	Performance of a contract
Information gathered and entered into a CV	You - when we begin initial communications regarding partnership.	To provide to us an overview of your knowledge and experience which helps us to make	Legitimate Interest

	Data may also be collected during contract negotiations.	accurate and informed decisions on your ability to work on a particular area of work or project.	
Details on education and employment history	<p>You - when we begin initial communications regarding partnership.</p> <p>Data may also be collected during contract negotiations.</p>	To provide to us an overview of your knowledge and experience which helps us to make accurate and informed decisions on your ability to work on a particular area of work or project.	Legitimate Interest
Portfolio of work and confirmation of skills and expertise	You - when we begin initial communications regarding partnership.	To provide to us an overview of your knowledge and	Legitimate Interest

	Data may also be collected during contract negotiations.	experience which helps us to make accurate and informed decisions on your ability to work on a particular area of work or project.	
Information included in a biography, including a photograph	You – once the contract is complete and prior to appointment of first project.	To provide to our client an overview of your knowledge and experience which enables you to work on a particular project.	Legitimate Interest
Expense details and receipts	You – upon completion of a project	To facilitate payment for the products and services provided by you.	Performance of a contract

## Suppliers

<b>Personal data type:</b>	<b>Source:</b>	<b>Purpose:</b>	<b>Legal basis:</b>
Company name and address	You - when we begin initial communications regarding partnership.  Data may also be collected during contract negotiations.	To enter into a contract with you.	Performance of a contract
Company registration number and VAT number	You – during contract negotiations and/or submission of request for payment for services.	To enter into a contract with you.	Performance of a contract
Supplier contacts and points of reference, including name, email address and contact number	You - when we begin initial communications regarding partnership.  Data may also be collected during contract negotiations.	For administration purposes – to ensure we have a central point of contact during our business relationship.	Performance of a contract

Fees	<p>You - when we begin initial communications regarding partnership.</p> <p>Data may also be collected during contract negotiations.</p>	To enter into a contract with you.	Performance of a contract
Financial details, including bank details.	<p>You - when we begin initial communications regarding partnership.</p> <p>Data may also be collected during contract negotiations.</p>	To facilitate payment for the products and services provided by you.	Performance of a contract
Expense details and receipts	You – upon completion of a project	To facilitate payment for the products and	Performance of a contract

		services provided by you.	
Details on products and services you provide to us	You - when we begin initial communications regarding partnership.  Data may also be collected during contract negotiations.	To manage the ongoing business relationship and to help us identify whether any additional products and services will be beneficial to us.	Legitimate Interest

### Website Users

<b>Personal data type:</b>	<b>Source:</b>	<b>Purpose:</b>	<b>Legal basis:</b>
Name, email address and contact number	You – when you request to contact us via our website.	To enable us to respond to your website enquiry.	Consent
Job title	You – when you request to contact us via our website.	To enable us to respond to your website enquiry.	Consent

<p>Company whom you work for or are associated with</p>	<p>You – when you request to contact us via our website.</p>	<p>To enable us to respond to your website enquiry.</p> <p>We also process this data, so we are able to review if we have an existing relationship with you in order to assign the most relevant person to your query.</p>	<p>Consent</p>
<p>Details relating to a specific query around products and services provided by us.</p>	<p>You – when you request to contact us via our website.</p>	<p>To enable us to respond to your website enquiry.</p>	<p>Consent</p>

Technical data including IP address and any other data that is used to access our website	You – when you access the Sova website.	To enable the efficient functioning of our website.	Consent
Marketing data, including date of subscription and communication preferences	You – when you opt-in to receive our newsletter and any other communications regarding our products and services.	To manage your preferences in relation to how we communicate with you.	Consent

## 5. SPECIAL CATEGORIES OF DATA

Special category data is only that which is provided by you, the data subject. We do not process special categories of data.

## 6. CONSENT

Consent is required where we process technical data including your IP address and any other associated technical information. Such consent is obtained when you provide consent via our website and/or online platform.

Consent is also required for the processing of marketing data. Such consent is obtained during the beginning of our business relationship and/or when you provide consent via our website.

You may withdraw consent at any time by contacting our Data Protection representatives, using the below contact information.

- [compliance@sovaassessment.com](mailto:compliance@sovaassessment.com)
- 0207 947 4330

## 7. DISCLOSURE

Sova Assessment may share your data with third parties and for the purposes set out below:

### Subsidiaries of Sova Assessment

- any of our subsidiaries whereby products and services have been rendered for utilisation outside the scope of Sova UK.

- any of our subsidiaries whereby products and services are required for the purpose of completing a particular project which is outside of the UK.
- any of our subsidiaries whereby an enquiry is most suited to business operations outside of the UK.

### Third parties (acting as sub-processors)

- sub-contractors who provide services on our behalf.
- suppliers who provide IT, system administration and platform services to us, as well as suppliers providing any other services connected to the service we provide.

As required by Data Protection Legislation, any sharing of personal data is subject to appropriate confidentiality obligations and safeguards, as per the below.

- relevant contractual clauses are in operation to ensure third party due diligence in relation to data security.
- third party processes are checked to ensure appropriate safeguards are adopted.

<b>Personal data type:</b>	<b>Legal basis for processing:</b>
Subsidiaries of Sova Assessment	Performance of a contract  Legitimate Interest
Third parties (acting as sub-processors)	Performance of a contract

## 8. INTERNATIONAL TRANSFERS OF PERSONAL DATA

Where personal data is transferred outside the UK and EEA (which includes all EU countries plus Iceland, Liechtenstein and Norway), we take all reasonably necessary measures to ensure that the protection offered by the GDPR will travel with the data and, that your data is treated securely and in accordance with this Privacy Notice and the requirements of Data Protection Legislation. This means that when exporting data abroad, we will ensure one of the following measures are adhered to:

- the non-UK/non-EU country's protections are deemed adequate by the EU.
- relevant contractual clauses are in operation to ensure third party due diligence in relation to data security.
- third party processes are checked to ensure appropriate safeguards are adopted.
- specific grounds for the transfer (derogations) such as the consent of the individual are applicable.

## 9. RETENTION PERIOD

Sova Assessment will process personal data for as long as necessary to fulfil the purposes for which the data was collected.

Record	Retention Period
Client Contracts, agreements, and other arrangements	For the length of the contract or agreement and 6 years afterwards
All other Contracts, agreements, and other arrangements	For the length of the contract or agreement and 6 years afterwards

Correspondence	Emails are archived and then permanently deleted after 10 years
Customer and client records	These records are kept for as long as they are relevant to the operations of the business.
All other records (supplier, sub-contractor records)	These records are kept for as long as they are relevant to the operations of the business.
Opt-in and out agreements	For as long as necessary.

If you require further information on specific retention periods, please contact us (see section 4.2 for how to contact us).

## 10. AUTOMATED DECISION-MAKING

Automated decision-making means making decisions about you using no human involvement. No decision will be made using Automated decision making.

## 11. HOW WE KEEP YOUR DATA SECURE

Sova Assessment are committed to ensuring the security of your data. As the data processor, we ensure that all necessary steps are taken to protect against the potential loss, unauthorised disclosure of, or access to, the personal data we process or use. Sova Assessment adopts the following safeguards to ensure the security of your data.

- personal data will only be kept for as long as necessary to fulfil the purposes for which the data was collected, unless otherwise directed by you.
- access to personal data is restricted to authorised individuals.
- secure encryption policies are in operation.
- all the provisions of ISO 27001 certification.

## 12. YOUR RIGHTS AS A DATA SUBJECT

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.

- Right of portability – you have the right to have the data we hold about you transferred to another organisation in certain situations.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling.
- Right to judicial review: in the event that we refuse your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 17 below.

You can exercise your right by contacting us at the following email address – [compliance@sovaassessment.com](mailto:compliance@sovaassessment.com)

All of the above requests will be forwarded on to the third parties involved (as stated in 8 above) in the processing of your personal data.

### **13. CHANGES**

We may update and vary this Privacy Notice from time to time. Any updates will be published on our website.

### **14. COMPLAINTS**

In the event that you wish to make a complaint about how your personal data is being processed by Sova Assessment (or third parties as described in 10 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Sova Assessment's data protection representatives.

Sova Assessment has contracted the services of GRCI Law to act as its Data Protection Officer (DPO). Accordingly, Sova Assessment will seek advice, guidance, and input from the DPO where necessary.

The details for each of these contacts are:

Contact name	Supervisory authority	DPO
Address line 1:	UK Information Commissioner's Office (ICO)	GRCI Law
Address line 2:	Wycliffe House, Water Lane	GRC International Group Plc, Unit 3, Clive Court
Address line 3:	Wilmslow	Bartholomew's Walk, Cambridgeshire Business Park
Address line 4:	Cheshire	Ely, Cambridgeshire
Postcode:	SK9 5AF	CB7 4EA
Email:	casework@ico.org.uk	compliance@sovaassessment.com

## CHANGE HISTORY RECORD

Last updated 24th May 2021, V 2.1