

Introduction to the Global Data Protection Notice

Please read this Data Protection Notice (“Notice”) to continue. It sets out how and why SHL collects your personal information.

Please read the entire Notice carefully.

If you have questions about this Notice, please contact dpo@shl.com

Data Protection Notice

This Notice was last updated on 13 October 2025.

Section 1 - Who we are and Scope of Notice

This Notice describes how:

1. your Employer/potential new Employer (“**Employer**”); and
2. **SHL Group Limited**, of The Pavilion, 1 Atwell Place, Thames Ditton, Surrey KT7 0NE, England, and our affiliated group of companies (together, “SHL”, “we”, or “us”) each acting as a **Data Processor** of your Personal Information (defined below);

respectively use your information collected through this “Insights Platform” or other interactions with you.

SHL will process and collect your information for you to use this Insights Platform in accordance with this Notice. Some information is personal information about you or from which we can identify you (“Personal Information”).

This Notice sets out the way the Employer and SHL use your information: **what is collected, how it is collected, how it is used, why it is used, who it is shared with and the rights to which you will be entitled.**

Section 2 (Employer as the Data Controller) provides further information on **processing of your personal information by the Employer as the data controller.**

Section 3 (Data Sharing and Your Rights) provides additional information on who **SHL and the Employer share your data with and an overview of your rights under Applicable Data Protection Law.**

Section 2 - Employer as the Data Controller

SHL collects your Personal Information on behalf of your Employer. If you have a query as to the identity of the Employer, please contact the SHL Data Protection Officer (DPO) at dpo@shl.com or the contact details included at the end of this Notice.

The Employer will be the data controller in respect of your Personal Information, and the Employer uses the Insights Platform to support its business and engagement with employees and your administrators, what data is collected, the purposes for which it is collected and who it is shared with. You will be able to exercise your rights directly against the Employer in respect of this Personal Information. See section 3 (Data Sharing and Your Rights) for more information.

What we collect

The Personal Information we collect depends on your usage profile. You are an **“Administrator”** on the Insights Platform if you work for the Employer who is operating the Insights Platform, and you are using it as part of your role for the Employer. This includes all roles that are not a Participant, such as creating profiles, creating Insights dashboards and downloading reports. You are a **“Participant”** if you are using the Insights Platform to view your assessment results generated on SHL systems and included in the Insights Platform. We collect:

1. For both **“Administrator Data”** and **“Participant Data”** the following, which includes your:
 - name
 - email address
 - account login details
 - language
 - selected password for the Insights Platform
2. If you elect to provide it, **“Participant Data”** will also include:
 - title
 - gender
 - business function
 - year of birth
 - location
 - additional data that the Employer may elect to ask
3. To the extent that the Participant has taken any assessments on the SHL system, the Employer may copy the scores of such Participant assessments (**“Assessment Data”**) to the Insights Platform as part of the information included in the Insights Platform. The Assessment Data is collected under the data protection notice provided when you take the assessment.

Using the Participant Data, including any Assessment Data, we generate profiles and information for Administrators and Participants to view on the Insights Platform as part of the overall information available about Participants to generate the “Results Data”. Results Data includes the reported results of your Assessment. Some Assessments include multiple competencies and corresponding computational models and therefore Results Data includes several scores.

What we do with the data

We use your Administrator Data to provide Administrators with access to the Insights Platform. We use Participant Data and Assessment Data on behalf of the Employer to:

1. allow you as a Participant to access the Insights Platform
2. use the Results Data to provide a view of your information on the Insights Platform;
3. provide our services to the Employer; and
4. manage and administer our services.

Why do we collect this data and how long do we retain it

We hold and process your Administrator Data, Participant Data, and Results Data, in accordance with the Employer’s instructions. The reason the Employer collects your Personal Information is to process your Personal Information for the following legitimate interests:

1. to evaluate your suitability for a role you have applied for;
2. to perform analytics on the characteristic profile required for the role; and
3. to evaluate your promotion opportunities or development requirements.

as part of an overall recruiting/development/promotion process. The Employer may also instruct us to process your Personal Information because you have provided consent or if necessary, on reasonable requests by a law enforcement or regulatory authority, body or agency or in defense of a legal claim(s) on behalf of the Employer.

We will keep your Personal Information on behalf of the Employer in accordance with the Employer's instructions. The period of time that we are instructed to hold your Personal Information varies from Employer to Employer. We will not delete your Personal Information if relevant to an investigation or a dispute. It will continue to be stored until those issues are fully resolved.

You should contact the Employer directly if you require more information in this section.

Employer’s Data Sharing

We will only share your Personal Information processed on behalf of the

Employer with the Employer and on the Employer's instructions. The Employer may share your Personal Information with other third parties including its group companies and those parties listed at section 3. You should contact the Employer for more information to confirm with whom they share your Personal Information.

Where your Personal Information will be held

We store your Personal Information in data centers located in Germany and backed up in Ireland. SHL affiliates also transfer your Personal Information within the European Economic Area (" EEA").

Additionally, your Personal Information is transferred to the United States, India, South Africa and the United Kingdom ("SHL Non-EEA Processing Locations") in accordance with Applicable Data Protection Law, where a limited number of personnel in our SHL Non-EEA Processing Locations, as well as our trusted third-party vendors and service providers, have access to Personal Information in order to provide services. As the majority of the SHL Non-EEA Processing Locations are in countries which do not have equivalent data protection laws to those applicable in the EEA we have an Intragroup Agreement in place, signed by all SHL affiliates, which contains the European Union (EU) Standard Contractual Clauses (SCCs) which have been approved by the EU data protection authorities for the transfer of data outside the EEA.

In addition, our third-party vendors and service providers are also required to sign up to SCCs in accordance with Article 46 of the GDPR. All SHL affiliates have the same technical, physical, and administrative security controls and are required to comply with our data protection policies and procedures, and applicable laws governing the collection and use of personal information.

We are happy to provide you with copies of the SCCs, which you can request from the SHL Data Protection Officer (DPO) on dpo@shl.com or via the contact details included at the end of this Notice.

When do we share Personal Information

We have set out the circumstances in which we will share your data with third parties below:

- We will share a combination of your Assessment Data, Results Data, Employer Provided Data and Research Data within our group companies when required to provide maintenance and support services and so that we can continue to improve the services we provide across the group.
- We will also share your information with our trusted third-party service providers, including our survey tool provider, scheduling tool, video back-up support, IT security provider and cloud hosting platform provider. Our service providers will be required to meet our standards on processing information and security.

Section 3 – Data Sharing and Your Rights

Data Sharing

The Employer, as the data controller, will share your data with the following third parties in the below circumstances. If the Controller is:

1. discussing selling or transferring part or all our business, Personal Information will be transferred to prospective purchasers under suitable terms as to confidentiality;
2. being reorganized or sold, Personal Information will be transferred to a buyer who can continue to provide services to you;
3. required to by law, or under any regulatory code or practice we follow, or if we are asked by any public or regulatory authority - for example the Police; and
4. defending a legal claim, your Personal Information will be transferred as required in connection with defending such claim.

Data Subject Rights under the EU General Data Protection Regulation (GDPR)

In certain circumstances, you may have rights under GDPR. If the GDPR applies to your data, we've listed the rights you have over your Personal Information and how you can use them below. These rights are subject to exemptions in applicable law and will only apply to certain types of information or processing. As described above, the Employer will be data controller so you should contact them directly if you want to exercise a right over data for which they are data controllers.

1. The right to withdraw consent: Where we or the Employer have obtained consent for some of the ways we use your information you can remove that consent at any time by contacting the Employer or the SHL Data Protection Officer (DPO) at dpo@shl.com or the contact details included at the end of this Notice.
2. You can ask us to confirm if we are processing your Personal Information and, if we are, you can ask for access to that Personal Information as well as further details including why your data is being used and for what purposes.
3. You can ask to correct your Personal Information held by us and the Employer if it is wrong.
4. You can ask us and the Employer to delete your Personal Information.
5. You can ask us and the Employer to restrict how we use your Personal Information.
6. You can ask us and the Employer to help you move certain Personal Information to other companies. To help with that you have a right to ask

that we or the Employer provide your Personal Information in a machine-readable format to another company.

7. You can ask us and the Employer to stop using your Personal Information, but only in certain cases. This applies where we are processing your personal information based on a legitimate interest (or those of a third party) and you can object to processing on this ground. However, we will be entitled to continue processing your information based on our compelling legitimate interests.

You also have a right to make a complaint to a Supervisory Authority. Where we are the data controller you can contact the UK Information Commissioner's Office; or the local data protection regulator in your jurisdiction.

Where the Employer is the data controller, you can contact the regulator in the location where the Employer is based.

Questions or Complaints

Questions about the results of your assessment or the Employer's use of your Personal Information should be sent directly to the Employer at whose request you take the assessment.

If you have any questions about this Notice, please contact the SHL Data Protection Officer (DPO) on dpo@shl.com or the contact details included at the end of this Notice.

Changes to the Notice

This Notice will be changed from time to time. If we change anything important about this Notice (the information we collect, how we use it or why) we will provide a prominent notice to bring your attention to such important changes for a reasonable length of time following the change.

If you would like to access previous versions of this Notice, please contact the SHL Data Protection Officer (DPO) at dpo@shl.com or the contact details included at the end of this Notice.

Other policies

Security: We are committed to keeping your personal information safe. We have implemented physical, technical and administrative measures to help prevent unauthorized access or use of your information. For more information about the security measures we have please see our: [Security Policy](#).

Sanctions: SHL products and services are subject to US sanctions law. As a result, prohibited individuals, or those located in certain countries (Cuba, Iran, North Korea and Russia), are not authorized to take assessments on our systems. Please contact us at dpo@shl.com with any questions.

SHL Data Protection Officer Contact Details:

email: dpo@shl.com or via post to the Data Protection Officer

For EU users:

Data Protection Officer:
SHL Nederland BV
9th floor,
Central Park,
Stadsplateau 29,
3521 AZ,
Utrecht,
The Netherlands

For all other users:

Data Protection Officer
SHL Group Ltd.
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1 Atwell Place,
Thames Ditton,
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KT7 0NE,
United Kingdom