

10X Psychology - PRIVACY POLICY

At 10X PSYCHOLOGY Limited - (“10x”, “we”, “us” or “our” in this Policy), we are committed to respecting your privacy and protecting the personal data that we obtain and hold about you and others.

10x provides a platform (“Platform”) which conducts advanced psychometrics science, predictive analytics and machine learning to help employer businesses (“10x Clients”, “Employer” or “Prospective Employer”) attract, retain and develop employees.

Part 1 of this privacy policy (“Policy”) explains how we will process the personal data relating to visitors of our website at www.10xpsychology.com, in respect of current or prospective 10x Clients and in relation to any query or communication sent to us.

Part 2 of this Policy explains how we process personal data on behalf of 10x Clients when an individual completes one of our assessments.

PART 1

1. INTRODUCTION

This **Part 1** explains how we will process the personal data relating to you that you provide to us when you visit our website, in respect of current or prospective 10x Clients and in relation to any query or communication that you may send to us.

This website is operated by 10X PSYCHOLOGY Limited, a company registered in England & Wales. Where we decide the purpose or means for the processing of the personal data that you provide when using our website or, we are the “data controller” for the purposes of the European General Data Protection Regulation 2016 (“GDPR”).

Our website and Platform may contain hyperlinks to third party websites. These websites operate fully independently from us, and we cannot accept any responsibility or liability for the privacy practices of such third parties nor the availability of these external sites or resources. The appearance of such links on our website is not an endorsement. Should you use any of these websites, such use is at your own risk and we would recommend that you review their respective privacy policies and Terms and Conditions.

2. WHAT INFORMATION WILL WE COLLECT ABOUT YOU?

Information provided by you when using our Website

If you contact us about our services, the forms you complete or the emails you send may include information about you, such as your full name, your email address, the organisation on behalf of whom you are contacting us (if applicable) and your enquiry.

Analytics Information

Our website uses cookies and other mechanisms to collect and log analytical information, to help analyse how visitors use the website and to compile statistical reports on website activity. This information is not used to develop a personal profile of you. To find out more about the use of cookies, please visit <http://www.allaboutcookies.org/>.

We use the third party analytics provider Google Analytics for this. When you visit our website, the following data may be collected, which will be anonymised and aggregated before reporting back to us:

- number of visitors to our website;
- pages visited while at the website and time spent per page;

- page interaction information, such as scrolling, clicks and browsing methods;
- websites where visitors have come from and where they go afterwards;
- page response times and any download errors; and
- other technical information relating to end user device, such as IP address or browser plug-in.

To find out more about Google Analytics and to learn how to opt out, please visit:

- How Google uses data when you use our partners' sites or apps ([here](#)) , or
- <https://tools.google.com/dlpage/gaoptout/>.

Information provided by you when using the Client-side Platform

In order to provide a 10x Client with access to the Platform and enable them to administer the 10x Assessments, we collect the full name, email address and password of each individual authorised by such 10x Client to access the Platform.

3. HOW WE USE YOUR PERSONAL DATA

Providing our services to Clients and prospective Clients

In line with the legitimate interest we have in promoting and operating our business we may process information about you to administer Platform log-ins (where applicable) and to deliver our Services to 10x Clients under the agreed terms of service.

We may also process your enquiries to reply and provide support, including providing you and/or your organisation with information about the Services we offer.

Newsletter and Mailing List

If you ask to be added to our mailing list by subscribing to our newsletter, we will keep you updated with information on news, offers, and updates about 10x.

In line with the legitimate interest we have in promoting our business, we will use the email address you give us via our website to provide you with this information. If you would like to be removed from that list please let us know by clicking unsubscribe at the bottom of any marketing email that you receive.

There may also be circumstances where we will ask you for your prior consent in respect of our use of your personal data or where we may rely on an alternative lawful basis to process your personal data in which case you will be notified at the time.

Analytics

We use website analytics to understand visitor behavior patterns. We do this to find out such things as the number of visitors to the various parts of the site. We undertake such monitoring in the pursuit of our legitimate interests in improving our website, and to provide a better service and source of information to visitors.

All content you submit to us

If you send us objectionable content or otherwise behave in a disruptive manner when using our website, we may process personal data included in your messages to respond to and stop such behavior.

We only process personal data in this way for the legitimate interests of ensuring that use of our website and the Platform is lawful, does not disrupt our systems, does not harass our staff or other individuals, and to enforce our legal rights and to comply with our legal obligations.

Where we reasonably believe you are or may be in breach of the law (for instance, because content you send amounts to harassment or is defamatory), we may use your personal data to inform relevant third parties such as your email/internet provider or law enforcement agencies about the content.

Where we process personal data in this way, we will hold that personal data on our systems for as long as is reasonably necessary to achieve these objectives.

4. DO WE SHARE YOUR INFORMATION?

We keep your information confidential, but may disclose it to our personnel, suppliers or subcontractors insofar as it is reasonably necessary for the purposes set out in this Policy. If we provide your personal data to third parties, we shall only do so provided that they do not make independent use of the information and provide the same confidential treatment as we do.

We only permit them to process your personal data for specified purposes and in accordance with our instructions. All our third-party service providers are required to take appropriate security measures to protect your personal data. Activities which are carried out by or in collaboration with third party service providers include, Cloud Computing Platform, IT Support.

In addition, we may disclose your personal data to the extent that we are required to do so by law (which may include to government bodies and law enforcement agencies); in connection with any legal proceedings or prospective legal proceedings; and to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention).

If we are involved in a merger, acquisition, or sale of all or a portion of our business or assets, the personal data we hold may be included as part of that sale, in which case you will be notified via email, your account and/or a prominent notice on the website of any changes in ownership or use of your information, as well as any choices you may have regarding that information.

Except as provided above, we will not provide your information to third parties.

5. YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA WHICH WE PROCESS.

You have the following rights over the way we process personal data relating to you. We aim to comply without undue delay, and within one month at the latest, in response to any requests submitted by you to us:

- for a copy of personal data we are processing about you and/or to have inaccuracies corrected;
- to restrict, stop processing, or to delete your personal data;
- for a machine-readable copy of your personal data, which you can use with another service provider. Where it is technically feasible, you can ask us to send this information directly to another provider if you prefer; and
- to make a complaint to a data protection regulator. You may contact them at:
<https://ico.org.uk/concerns/>

To make a request in relation to any of the aforementioned rights, please send your requests to info@10xpsychology.com.

6. CHILDREN

We do not use the website to knowingly solicit information from or market to children under the age of 18. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should contact us at info@10xpsychology.com. We will delete such information within a reasonable time.

7. SECURITY

We will take appropriate technical and organisational measures to ensure a level of security appropriate to the risk that could be encountered via the use of our website and Services taking into account the likelihood and severity those risks might pose to the rights and freedoms of our website visitors and customers.

In particular, we will take precautions to protect against the accidental or unlawful destruction, loss or alteration, and unauthorized disclosure of or access to the personal data transmitted, stored or otherwise processed by us.

Please be aware that, while we make the security of our website and your personal data a high priority and devote considerable time and resources to maintain robust IT security, no security system can prevent all security breaches. When you choose to share your personal data with us, you accept the aforesaid and provide your information at your own risk.

8. INTERNATIONAL DATA TRANSFERS

We are a UK Company and our servers are located in the EEA and the information that we collect directly from you will be stored in these servers.

There are agreements in place to ensure that personal data is processed using appropriate safeguards that meet the requirements of data protection laws. Such appropriate safeguards may include standard data protection clauses adopted by a data protection regulator and approved by the European Commission, such as the European Commission's standard contractual clauses.

If you would like to find out more about these safeguards or if you have any other queries or comments in relation to this Policy, please let us know by emailing us at info@10xpsychology.com.

To find out more about the standard contractual clauses, please visit: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en

9. RETENTION PERIODS OR CRITERIA

We will hold your personal data for as long as is necessary for the relevant purpose for which that personal data was obtained, or as otherwise described in this Policy.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

If you would like us to stop using or holding your personal data and/or would like to request its deletion, please email us at info@10xpsychology.com

10. CHANGES

This Policy may be updated from time to time. We will notify you of any changes by posting the new Policy here www.10xpsychology.com, and, where feasible, by letting you know by email or your account.

11. CONTACT US

Questions, comments and requests in relation to this Policy are welcome and should be addressed to info@10xpsychology.com.

PART 2

1. INTRODUCTION

This **Part 2** explains how we process your data on behalf of 10x Clients when you complete a 10x Assessment.

The 10x Client for whom you are completing the assessment, controls, and determines the purposes and means of processing, your personal data. 10x only processes your personal data on behalf of the Employer or Prospective Employer.

You should review your Employer or Prospective Employer's privacy policy for further details on how your personal data will be used.

2. KEY POINTS REGARDING YOUR 10X ASSESSMENT

- If you are completing a 10x Assessment as part of a talent process with your Employer or Prospective Employer, your data will be used by the Employer or Prospective Employer to help inform their selection decisions, shortlisting and whether or not to make you an offer.
- Your 10x Assessment responses will be used to confirm that the assessment questions are consistent, measure what they are supposed to, and are clear to participants.
- The demographic data you provide (such as, for example, data relating to your education and ethnicity) will be used to generate anonymised comparison groups for benchmarking purposes and to ensure that assessments are designed to avoid any bias in assessments or unlawful discrimination.
- Your personal data will never be shared with third parties by us except with your Employer or Prospective Employer (other than where permitted by law).
- We collect and process special category (or sensitive) personal data (such as, for example, your health details, religion, sexual orientation) (**special category data**). Your prior consent will typically be sought, that we may process such special category data on behalf of the Employer or Prospective Employer, unless the Employer or Prospective Employer is entitled to rely on other lawful bases to process that special category data.
- Data about how you have interacted with the 10x Assessment will be used to better understand the effectiveness of the assessment methodology and trends for talent measurement purposes. This includes recording when a response is selected (even if you change your mind) and how long you have taken over each question. This information will be analysed to determine the difficulty of the questions, whether there is a potential response which acts a distractor and also gain information about how participants approach completing the 10x Assessment. When undertaking such an analysis, the data is anonymised and linked with the 10x Assessment responses rather than an identifiable individual.
- Once you have completed the 10x Assessment, you may be provided with access to a dashboard containing information about your overall strengths and the progress of your 10x Assessment. Such access will in each case be determined by the Employer or Prospective Employer. To ensure your personal data is only kept for a minimal amount of time, this dashboard will typically only be available for 45 days after you have completed the 10x Assessment.
- After 45 days, your identifiable data will be anonymised and (unless the dashboard access is made available for longer by your Employer or Prospective Employer) it will not be possible for you to log back in.

- 10x will only contact you for reasons relevant to the 10x Assessments. To communicate effectively throughout the process we require an email address, first name and last name. 10x will not contact you for direct marketing purposes, unless you have expressly agreed to this (in which case you should refer to 10x's own Privacy Policy on its website which explains how 10x may process your data in the capacity as a data controller).
- When participating in a 10x Assessment, we may also gather technical information about your web browser for technical, security and performance issues, as well as understanding which browsers are most commonly used. This information also allows quicker investigation and diagnosis of any technical issues that are raised with how the 10x Assessment platform performs.
- The personal data you provide will be anonymised and used by the 10x Research and Development Team to help further develop 10x products. This anonymised data will not link back to you as an identifiable person. Our interest is in the collective responses of the group, and sub-groups within it, rather than the results of an identifiable individual.

3. **RETENTION**

- In accordance with data protection laws and good commercial practice, we aim not retain data in a form that permits identification of the person(s) to whom it relates for any longer than is necessary. Data retention will in each case be determined by your Employer or Prospective Employer.

4. **YOUR RIGHTS**

- You have a number of rights in relation to the way your personal data is processed, including the right of access, to rectification, to erasure, to restrict processing, to data portability, to object and not to be subject to a decision based solely on automated processing.
- To make a data subject rights request, please let your Employer/Prospective Employer or Prospective Employer know by contacting them directly. Their contact details will typically be set out in their Privacy Policy.

5. **SECURITY OF DATA**

- We will take appropriate technical and organisational measures to ensure a level of security appropriate to the risk that could be encountered via the use of the 10x Assessment.
- In particular, we will take precautions to protect against the accidental or unlawful destruction, loss or alteration, and unauthorised disclosure of or access to the personal data transmitted, stored or otherwise processed by us.
- Please be aware that, while we make the security of your personal data a high priority and devote considerable time and resources to maintain robust IT security, no security system can prevent all security breaches.

6. **QUESTIONS**

Questions and comments in relation to this notice are welcome and should be addressed to info@10xpsychology.com