

PROPHET

Predictive Role Profiling for
High-Performing Executive Teams

Table of Contents

PROPHET Profiling Ltd.'s Data and Privacy Policies	2
Executive Summary	3
Data protection principles.....	4
Data and Privacy Policies for users of PROPHET services	5
Details of the data PROPHET may collect from you	5
Administering PROPHET online	6
Cookies.....	6
How PROPHET uses data	7
Commitment to equality	8
Data anonymisation.....	9
The right to opt out of direct communications	10
How PROPHET keeps your data secure.....	10
Where is data stored – the PROPHET Database	11
Who has access to PROPHET Reports	11
Continuing to use PROPHET within an organisation or team.....	12
Keeping data up to date	12
Who data may be shared with	13
Links to other sites.....	13
How you can obtain data we hold about you	14
Terms of Use for Accredited PROPHET Practitioners	14
IT Acceptable Use Policy.....	16
Copyright.....	17
Governing law	18
Information Classification Policy	18
Corporate Accounts and Accredited Users of PROPHET – Understanding the responsibilities of Data Processor and Data Controller	21
How you can contact us	24
Changes to this policy.....	24

PROPHET Profiling Ltd.'s Data and Privacy Policies

This is the Data and Privacy Policy 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

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 (registration number Z8910301) and applicable regulations, including European General Data Protection Regulation. PROPHET is also committed to fairness and equality which pertains to why we collect certain data in the UK jurisdiction. These policies relate to our commitments to privacy, security and equality.

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.

Executive Summary

This summary of the policy is for respondents and practitioners working with PROPHET covering the most important points concerning the security and proper use of their data:

1. PROPHET data is to be used for **executive development purposes only**. Respondents consent to this when they complete the questionnaire.
2. PROPHET Reports **can only be purchased by those accredited in PROPHET**; accredited individuals are carefully selected and trained.
3. The accredited user is responsible for making sure there are **no surprises about who will see a profile during the course of the initiative**. For example, colleagues may see each other's profiles during team development; or a leadership team or HR may see overall patterns of profiles.
4. PROPHET data is **not sold to outside companies**. PROPHET does not use respondents' personal data to market to them. PROPHET only markets to coaching or HR practitioners who are kept informed of product developments.
5. PROPHET has in place **appropriate measures to protect and secure** the information.
6. PROPHET **does not keep personal data for longer than is necessary**; how long depends on the duration of the working relationship between PROPHET and the respondent's organisation.
7. **Personal data can be requested to be deleted at any time** by the respondent. If a respondent would like to have their personal data removed, they can let PROPHET know (by emailing prophet@prophetprofiling.com) and their personal data will be removed from the PROPHET database. In this event, we will advise the accredited user working with that person that we will be removing their data, so they would no longer be able to access their Profile.
8. **Where Organisations or Accredited Users order Profiles or Reports** from PROPHET, and store these for the purposes of their development work, they **are the Data Controller and PROPHET is the Data Processor**. These responsibilities run in parallel to PROPHET's commitments under these Data and Privacy Policies.
9. After personal data is deleted, PROPHET anonymises data meaning that a person can no longer be identified and their profile will no longer be able to be processed. **PROPHET uses anonymised aggregate data to validate the instrument**, which is crucial as part of registering PROPHET with the British Psychological Society. As no individual is identifiable from this data, this no longer falls within the scope of data protection acts. Where there is no request to delete personal data, PROPHET retains personal data for a 6-year period which begins after the termination of the relationship or contract between PROPHET and the organisation / individual client. This is to ensure people's Profiles are kept, for example, as people move between jobs to enable them to use their profile without having to complete it again (within the 6 year data retention timeframe), during development with teams they may join in the future as they progress in their careers.

Data protection principles

PROPHET is a UK-based company operating in international jurisdictions, predominantly the UK and Europe. PROPHET offers psychometric products and reports and accreditation to HR and L&D corporate practitioners, as well as executive coaches in conjunction with our partnership with Wisdom8.

We work with coaches and corporates in more than 35 countries globally.

PROPHET is committed to acting with integrity, and in compliance with applicable laws and business standards, including the British Psychological Society's Psychometric Testing Centre (BPS PTC), throughout our organisation and only accrediting users who accept to operate to these standards.

Every person who interacts with PROPHET has rights as to how their personal data is handled, and we recognise the need to treat all such data in an appropriate and lawful manner, according to the classification of such data. Personal data, including sensitive data, are subject to certain legal safeguards specified in the Data Protection Act 2018, a UK statute which gives effect to European legislation, including the EC Data Protection Directive 95/96/EC (General Data Protection Regulation (GDPR)), and which accords with similar national legislation across other European member states.

PROPHET is committed to complying with the Data Protection Act to make sure that data is:

- used fairly, lawfully and transparently
- used for specified, explicit purposes
- used in a way that is adequate, relevant and limited to only what is necessary
- accurate and, where necessary, kept up to date
- kept for no longer than is necessary
- handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage

In addition, Article 5 of the GDPR outlines the six principles that should be applied to any collection or processing of personal data:

1. Personal data must be processed lawfully, fairly and transparently.
2. Personal data can only be collected for specified, explicit and legitimate purposes.
3. Personal data must be adequate, relevant and limited to what is necessary for processing.
4. Personal data must be accurate and kept up to date.
5. Personal data must be kept in a form such that the data subject can be identified only as long as is necessary for processing.
6. Personal data must be processed in a manner that ensures its security.

This Data Protection Policy explains how our officers, employees and associated persons shall operate in relation to personal data, sensitive data and other data protection matters, including collection, storage, processing and destruction of data. It sets out the technical and organisational measures that we take in order to prevent unauthorised and unlawful processing, accidental loss or destruction or damage to personal data. We expect all our officers, employees and associated persons to comply with the Policy in all aspects of their day-to-day work.

Should you have any questions about PROPHET's approach to data protection or how we process personal data, please refer to our Policy or contact us. PROPHET's Board of Directors is responsible for ensuring and monitoring compliance with our Policy. They should be contacted in the first instance in relation to any data protection concerns. PROPHET is committed to ensuring we act in

accordance with data protection laws and recommended practice, and will take seriously any data protection concerns raised.

Data and Privacy Policies for users of PROPHET services

If you complete a PROPHET Profile, become a PROPHET Accredited User, or use our services, we collect the personal data you submit to us, and details of the transactions between you and PROPHET.

It is important not to send PROPHET any personal data about anyone else without their permission. For example, it is important that people do not process reports on behalf of someone, if they are not the accredited user. Equally, it is important not to complete a questionnaire on behalf of someone else.

Whenever PROPHET is given personal data via our websites, users are consenting to its collection and use in accordance with this privacy policy and any fair collection notice which is notified to them at the time of giving such data or during training (for example during accreditation).

PROPHET's privacy policy comprises:

- Details of the data PROPHET may collect from you
- Administering PROPHET on-line
- Cookies
- How PROPHET uses data
- Commitment to equality
- Data anonymisation
- The right to opt out of direct communications
- How PROPHET keeps your data secure
- Where is data stored – the PROPHET Database
- Who has access to PROPHET Reports
- Continuing to use PROPHET within an organisation or team
- Keeping data up to date
- Who data may be shared with
- Links to other sites
- How you can contact PROPHET
- How you can obtain data we hold about you
- Terms of Use for Accredited PROPHET Practitioners
- Copyright
- Governing law
- Changes to this policy

Details of the data PROPHET may collect from you

The data that PROPHET collects from you may include:

- Personal information, including name and other background information
- Information you provide when you complete forms on our site 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
- Details of transactions you have entered into through our site or other orders placed with us
- Data about your visits to a PROPHET site (including traffic data, location data, weblogs and other communication data whether this is required for our billing purposes or otherwise) and the resources that you access, including when cookies are used. PROPHET may also collect information about your computer, including, where available, IP address, operating system and browser type, for system administration. This is statistical data about browsing actions and patterns and no individual is identified in collection of this data.

Administering PROPHET online

The PROPHET questionnaire and reporting are administered online by connecting to the internet, optimised for use with any device (phone, tablet or PC / Mac). No software need be installed. Entry to the systems is password protected, so only an authorised respondent may access the questions. Scoring and reporting are automatic. The report is shared with the individual in a manner agreed in advance: it may be shared by an accredited person as part of the development programme for their team or business or alternately, the respondent may receive an email notification as soon as the report is available to be viewed.

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 particular 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 (www.prophet-profile.com; <https://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, www.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 (www.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 also use session cookies and persistent cookies. Session cookies are temporary cookies which exist only in the period you access the site and expire once you close the browser. They allow website operators to link the actions of users during a single browser session and therefore avoid people having to re-enter information. No information is passed to third parties for marketing purposes. 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. This Analytics data is collected via a JavaScript tag in the pages of our site and is not tied to personally identifiable information. We therefore do not collect or store your personal information (e.g. your name or address) so this information cannot be used to identify who you are.

You can find out more about Google's position on privacy as regards its analytics service at <https://support.google.com/analytics/answer/6004245?hl=en>

PROPHET use cookies in order to:

- Give information about the number of visitors to different parts of PROPHET's site and how visitors use the site
- Optimise a person's visit to PROPHET site, facilitate user administration including detection of mobile devices and to provide a user with content tailored to your interests based on your usage of the site
- Ease the browsing experience by optimising and improving the use of webforms, analysing user behaviour to improve usability of the site and track your preferences
- Enable the ordering of PROPHET products through an online shop, including use of a shopping basket
- Administer a customer online account, including remembering log-in details
- Understand how PROPHET's online advertising and marketing campaigns and promotions are working in order to improve the site design and product development, and to assess the effectiveness of our marketing and PR campaigns

PROPHET uses first party cookies set by ourselves only. Please note that partner organisations or third-party links on our website may use cookies over which we have no control. You may however restrict or block third party cookies through your browser settings and such blocking of cookies of third parties should not affect the functionality and use by you of PROPHET's website.

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 or Henley Business School)

- 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 into between you 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. It is possible to decline from providing this information and in these cases, certain data is not collected. The personal data will only be used for research purposes and only in anonymised and aggregated form.
- To automatically collect data about visitors to our site (for example on browsing patterns) by using cookies. The data is also used only in an anonymous form; no individual is identified or identifiable.

Commitment to equality

Before respondents start the questionnaire, they will be asked some background questions that help PROPHET interpret responses and allow them to create team reports for appropriate groups of people. There are also some questions that help with the on-going development of the questionnaire. The results of these questions do not form part of the results and are not shared with anyone. There is always a 'prefer not to say' option for those who do not wish to answer these questions, but it is helpful if people do complete them.

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 respondents to complete some 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 in line with the 2018 Data Protection Act. Respondents may choose not to answer any of these questions if they prefer not to.

N.B. There are differences across Europe and the world in the way ethnic monitoring is perceived. In some countries there is sensitivity for historical reasons, and users may encounter places where it is unacceptable to collect such data. In countries such as the UK it is seen as good practice and highly desirable. In other countries there are intermediate positions. It is important to be aware of where you are sending the questionnaire. PROPHET's settings work in such a way that if respondents answer that they come from the UK, it collects data on ethnicity. Otherwise the question is not asked.

Data anonymisation

Every individual has rights as to how their personal data is handled, and we recognise the need to treat all such data in an appropriate and lawful manner, according to the classification of such data. Personal data, including sensitive data, are subject to certain legal safeguards specified in the Data Protection Act 2018 (the Act).

At PROPHET, all personal and other data collected as part of completing the PROPHET questionnaire is handled in accordance with this Privacy Policy, and our Data Protection Statement and Terms of Use for Accredited PROPHET Practitioners. These set out the types of data that PROPHET collects, the retention periods, archive periods and also destruction method for such data.

In accordance with the Act, personal data should not be kept longer than is necessary for the purpose for which it is collected. This means that data should be destroyed or erased from PROPHET’s systems when no longer required. In relation to personal data and sensitive personal data collected as a result of the completion of the PROPHET questionnaire specifically (comprising psychometric test respondent data collected through www.prophet-questionnaire.com), such is retained for the duration of the client contract or relationship between PROPHET or the accredited user and the respondent, unless an individual or organisation requests for it to be deleted. PROPHET is usually conducted within the scope of client work, and PROPHET or coach client relationships tend to be long-standing, some lasting in excess of 15 years. Any research data collected in order to produce statistics of the type described in the PROPHET Technical Manual, e.g. psychometric norms, reliability and validity data) no longer constitutes personal data as it is anonymised and aggregated prior to research use, at which point no individual is identified or identifiable from such data and the data no longer falls within the scope of the Act.

Accordingly, PROPHET retains data for a 6-year period which begins after the termination of the relationship or contract between either PROPHET and the organisation / individual client and/or between the accredited coach and organisation / individual client. It will not be possible to order new reports or reprints of previously ordered reports, since the personal data from the originating questionnaire and the report such will have been deleted. If clients wish to order reports for any respondent who completed the questionnaire more than 6 years previously, the respondent must complete a new questionnaire and submit it to PROPHET for scoring and report generation in the usual manner. The reason for retaining data for 6 years is due to the development cycle during which PROPHET and our coaches typically work with clients. There is sometimes a hiatus between development assignments, for example people being coached or developed during their induction into new roles. When re-commencing development work, clients may wish to see their old profile or indeed compare results should they complete it again. Whilst PROPHET’s validity studies tell us that we can expect profiles to remain stable, we do however advise that if there has been a three-year gap, people may wish to re-complete the questionnaire, particularly if they have taken on more senior positions.

The PROPHET Database contains the following personal data that allows someone to be identified. This is deleted from PROPHET Manager either in order to archive the data when it is no longer necessary to keep – or when someone requests their data to be deleted.

PROPHET ID
Username

Password
First name
Surname
Preferred name
Email address
Company name
Job title

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. Therefore for anyone that is using PROPHET’s products and services, and continue to wish to do so, it is not possible to opt-out of all communications with us. This may for example include a previous respondent who has not requested their data to be deleted receiving an updated report should there be any meaningful changes to the PROPHET system, including branding updates.

How PROPHET keeps your data secure

We are committed to ensuring the security and integrity of personal information that we hold and acting in compliance with UK and EU data protection requirements, and have put in place appropriate technical and organisational safeguards to ensure this. We welcome updates at any time from our clients and enquirers relating to information that we hold about them.

As with all electronic communications, when people give data by that means, the data may be sent electronically to servers anywhere in the world and may be used, stored and processed anywhere in the world, including countries outside the European Economic Area (EEA) (where there may be cases of less stringent data protection laws).

Whenever and wherever we collect, process or use personal data, we take steps to ensure that it is treated securely and in accordance with our privacy policy. However, transmission of information via the internet is not completely secure and therefore we cannot guarantee the security of data submitted to our site or other electronic means. It is important to note that PROPHET does not transmit personal sensitive data, the root data given by a respondent as part of completing the PROPHET questionnaire. All personal data is stored in PROPHET’s database in order to produce the PROPHET Reports – but this data is never transmitted to client organisations or accredited users nor

ever to third parties for marketing or research. Only PROPHET Reports, which do not contain personal sensitive information or contact details, are transmitted as part of the PROPHET services.

Personal data collected through PROPHET is generally retained for a period of 6 years after the termination of a client or coach contract / relationship, after which it is deleted. Any research data retained thereafter no longer constitutes personal data as it is anonymised and aggregated on PROPHET systems prior to research use. Other data is retained for periods in accordance with applicable law and regulation. Deletion of personal data and retention and destruction of other data is dealt with in accordance with our Data Retention and Destruction policy and procedures.

Where PROPHET has given an individual (or where you have chosen) a username and/or password which enables you to access certain parts of our site, or use our goods and services, that individual is responsible for keeping the username and password confidential. They should not share these details with anyone.

Where is data stored – the PROPHET Database

PROPHET owns the data contained within the PROPHET proprietary database. Respondents may request for their data to be removed after an event.

The PROPHET site is hosted on Linux servers within Rackspace's London data centre managed over an encrypted SSH connection using strong passwords and DSA keys. Servers are protected by a Rackspace hosted external hardware firewall.

Multiple login failures are dealt with by an auto-blocking service that bans the offending IP address.

The MySQL database is only accessible to the local host. The firewall blocks it from the outside.

PROPHET database and service levels to clients are protected from attack or from a disruption in the Data Centre by:

- A back-up server that PROPHET switches to in the event of a problem (this server is subject to the same protections)
- Hourly back-ups of the PROPHET Database

Who has access to PROPHET Reports

Access to the PROPHET online environment is always password protected and users have individual permission regarding what data they can see.

As PROPHET is most commonly used as part of team development, there is a comprehensive set of analysis permissions that control the extent to which users can see other people within their organisation.

Visibility of individual profiles is as follows:

- Individual respondents can only see their own profile. Most users are only allowed this level of permission.

- Users who complete PROPHET as part of a team initiative can view analysis of their team colleagues, so long as everyone in the team is aware and consents to the use of their data as part of the group analysis. This is communicated when someone receives the invitation to complete PROPHET. This may also mean that key sponsors in the business who are associated with the development initiative (such as HR or more senior managers) may also view team analysis. This also applies to other reports that show colleagues' profiles together for the purpose of their development. Only a respondent's name, preferred name, and gendered pronoun are contained within the report; no other personal data collected as part of the preliminary questions is shown in a report.
- Accredited users can see anyone they have commissioned a profile for. If agreed, and respondents are advised in advance, the HR Director or Sponsor will see collective reports showing profiles of people from the whole organisation or team. For example, all profiles in an organisation where there is an HR accredited user who has purchased the profiles for the purposes of development within their business would be available to that accredited user when running a client wide initiative. The respondent is made aware of this before they complete the questionnaire. Accredited users are not able to see the categorisation of anyone for whom they have commissioned profiles (i.e. they do not have access to the personal sensitive data of a respondent collected via the preliminary questions).
- Only PROPHET staff are authorised to administrate data, and update the database. For example, PROPHET is able to update names or change personal data should the individual seek a correction or amendment. No-one other than PROPHET staff and developers have access to the data categorisation - as this is used solely for conducting anonymized studies, for example as part of validation for BPS registration, or as part of product development. No personal data collected as part of completing a questionnaire is used for PROPHET marketing.

Continuing to use PROPHET within an organisation or team

If the accredited users move to a new employer or a new section of their existing employer and are unable to take with them any restricted materials in their possession, it is their responsibility to ensure that the materials are not left in the care of an unqualified person. It may be possible, for instance, to pass them on to a colleague who is accredited and is qualified to use PROPHET. In the event that there are no known qualified individuals registered with PROPHET to whom the restricted materials may be entrusted, accredited users may wish to contact the PROPHET support team to discuss options.

Keeping data up to date

PROPHET does not automatically update personal details after the individual has completed the questionnaire, unless requested by the respondent or client organisation. An example where a change may be made would be in the case of a client organisation changing its name and any respondents that are associated with that organisation will have the name of the organisation to which they are attached updated accordingly. Other examples of data that may be changed upon request include updating a name or surname. We do not update personal data, such as age profiles etc., that may change over time. These remain static as of the time of completion of the questionnaire, in order that we have accurate data for technical studies on validation.

PROPHET does not track people as they move between organisations nor keep contact details of respondents up to date. If an individual respondent were to request that they transfer their report details so as to be used in a new organisation team profile, we are able to do so in exceptional instances. However, more commonly, PROPHET would propose that the individual completes the questionnaire again, as part of the new team initiative. We would however keep contact details up to date for existing or potential accredited users, namely coaches and HR (or similar functions) executives.

Who data may be shared with

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

- As necessary to fulfil your order(s) for our products and services and to validate your payment details
- To suppliers and licensors that process data on our behalf
- To associated accredited companies or individual accredited users who have purchased the products or services on your behalf
- In response to an expressed client need, interest or request by accredited users who are authorised to offer PROPHET goods and services
- In the event that we sell or buy any business or assets, including selling our business or assets
- 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 organisations for the purposes of fraud protection and credit risk reduction.
- Some of these third parties may be located outside the European Economic Area (EEA), for example credit card processing companies or IT service suppliers or licensors based outside the EEA and therefore data may be transferred to, or stored at, or processed in, a destination outside the EEA. Where personal data is transferred outside the EEA, we take all reasonably necessary steps to ensure that your data is treated securely and in accordance with this privacy policy, including, where applicable, by ensuring that the recipients to which it is sent are either “safe” countries with similar data protection regimes to ours. By submitting your personal data to us, you agree to this transfer, storing and processing.
- We may also provide personal data to anyone to whom our business or business assets are transferred.
- We may also disclose aggregated and anonymised information for marketing, product development, strategic or research purposes. In such data, no individual will be identified or identifiable from such data.

Links to other sites

This policy applies only to information collected by PROPHET. Links and references exist within our sites to other organisations that are not covered by this policy, so when you link to other websites you should read their own privacy policies. For example, our partner in coach accreditation,

Wisdom8. We do not accept any responsibility or liability for other organisation's policies. Please check those policies before you submit any personal data to those sites.

How you can obtain data we hold about you

If you wish to see a copy of the personal data that we hold about you, you can request this by writing to PROPHET Support at the above address. This right to see a copy of your personal data (a subject access request) exists under the Data Protection Act 2018 and, in accordance with the Act, we may charge you a fee of £10 for our costs in providing you with a copy of any personal data we hold about you.

Terms of Use for Accredited PROPHET Practitioners

Full details of terms of use for Accredited Users are contained within the User Guide and as part of Accreditation training. Adhering to ethical standards in using PROPHET is important to protect respondents' rights, as well as the integrity of the instrument. Accredited users of PROPHET are expected to employ the highest of standards when administering PROPHET and interpreting Profiles, as well as protecting the relevant copyrights. Accredited users who can be shown to have contravened the guidelines set out below may be refused access to PROPHET, may be asked to return any materials in their possession and prevented from accessing the online environment.

The standards expected of accredited users in the use of the instrument, as well as copyright, are outlined in this section.

It is important for practitioners to understand the psychology and measurement theory that informs PROPHET so that their respondents can benefit from the use of the correct tool and have the right development conversation. Appropriate use ensures that the respondent will gain increased self-awareness and insight, which lead to development.

If users lack sufficient training or knowledge in the use and application of psychometric instruments for developing a business they risk using it inappropriately. As with most psychometric instruments, PROPHET requires that in order to purchase or use this tool, those intending to utilise it must prove that they are competent to do so.

PROPHET offers accreditation to anyone who has training, a background or qualified experience in at least one psychometric personality tool, and experience of giving debriefs. This could, for example, be training in another psychometric personality instrument to the BPS Level 2 personality (previously called Intermediate Level B). Those who do not hold Intermediate Level B or Level 2 personality training for another instrument will need to contact us with details of their training and experience so that we can determine what training will be needed.

Accredited users of PROPHET should adhere to the following principles when working with both individuals and teams:

- Follow the administration and interpretation instructions contained in the PROPHET manual to ensure it is properly used.
- Make sure that no unqualified person is allowed to administer or interpret PROPHET.
- Keep all printed materials and reports in a safe place to prevent unqualified use and other misuses.

- Do not release passwords for the online reporting system to anyone other than approved users and business sponsors (e.g. management and HR).
- Inform respondents how long their data and their reports will be kept on file in their organisation, and indicate to whom and under what circumstances data will or will not be released
- Take reasonable steps to keep individuals' results confidential, only divulging them to someone other than the respondent when there is legitimate cause and with the respondent's full knowledge. Respondents should be informed in advance of completion of the instrument who could be privy to their report (e.g. their line manager or future managers).
- Observe all applicable laws on the protection of personal data.
- When debriefing a report ensure that the implications are clear to the respondent and explain the limitations of the psychometric instruments in any report (see section on Feedback in PROPHET's User Guide).
- Provide the respondent with adequate information about the theory on which PROPHET and its scales are based, and provide appropriate feedback on his or her results, preferably face-to-face.
- Never contravene copyright law by photocopying, computerising or adapting any part of PROPHET, its proprietary scoring system, or its various reporting forms.
- In the event of bad practice or breach of copyright or infringement of trademark in any organisation in which you have used PROPHET, take corrective action.
- Pay attention to differences between groups, in particular those of a different age, gender, race or ethnic background.
- Be mindful of any decisions that may be taken that impact the respondent, and ensure that selection decisions are not based on PROPHET results.

Purchases of PROPHET must be made by or on behalf of an identified accredited user who is qualified to use the restricted materials and has registered with PROPHET in accordance with its accreditation process.

In order to become accredited to purchase and use PROPHET, a user must have successfully completed appropriate accreditation qualification and training. All people undertaking accreditation training are expected to have a base level of experience in using psychometrics

IT Acceptable Use Policy

This section concerns what individuals may and may not do when using PROPHET's IT systems, and the consequences of breaking rules. This policy has been approved by the Board and any amendments to it require its approval.

It is the responsibility of all users of the PROPHET Profiling's IT services to read and understand this policy. This policy may be updated from time to time, in order to comply with legal and policy requirements.

Purpose

This Acceptable Use Policy is intended to provide a framework for such use of the PROPHET's IT resources. It should be interpreted such that it has the widest application and so as to include new and developing technologies and uses, which may not be explicitly referred to.

Scope

Employees and associates of PROPHET Profiling are bound by the provisions of its policies in addition to this Acceptable Use Policy. PROPHET seeks to promote and facilitate the positive and extensive use of Information Technology in the interests of supporting executive development and the research and development for the creation of PROPHET, to the highest possible standards. This also requires appropriate and legal use of the technologies and facilities made available to those working with of for PROPHET.

Unacceptable Use

PROPHET's network may not be used directly or indirectly by a User for the download, creation, manipulation, transmission or storage of:

1. Any offensive, obscene or indecent images, data or other material, or any data capable of being resolved into obscene or indecent images or material;
2. Unlawful material, or material that is defamatory, threatening, discriminatory, extremist or which has the potential to radicalise themselves or others;
3. Unsolicited "nuisance" emails;
4. Material which is subsequently used to facilitate harassment, bullying and/or victimisation of a member of PROPHET or a third party;
5. Material which promotes discrimination on the basis of race, gender, religion or belief, disability, age or sexual orientation;
6. Material with the intent to defraud or which is likely to deceive a third party;
7. Material which advocates or promotes any unlawful act;
8. Material that infringes the intellectual property rights or privacy rights of a third party, or that is in breach of a legal duty owed to another party; or
9. Material that brings PROPHET into disrepute.

The PROPHET Network must not be deliberately used by a User for activities having, or likely to have, any of the following characteristics:

1. Intentionally wasting staff effort or other PROPHET resources;
2. Corrupting, altering or destroying another User's data without their consent;
3. Disrupting the work of other Users or the correct functioning of the PROPHET Network; or
4. Denying access to the PROPHET Network and its services to other users.
5. Pursuance of commercial activities outside of the operations of PROPHET Profiling (even if in support of PROPHET business).

Where the PROPHET Network is being used to access another network, any abuse of the acceptable use policy of that network will be regarded as unacceptable use of the PROPHET Network.

Users shall not:

1. Introduce data-interception, password-detecting or similar software or devices to PROPHET's Network;
2. Seek to gain unauthorised access to restricted areas of the PROPHET's Network;
3. Access or try to access data where the user knows or ought to know that they should have no access;
4. Carry out any hacking activities; or
5. Intentionally or recklessly introduce any form of spyware, computer virus or other potentially malicious software.

Consequences of Breach

In the event of a breach of this Acceptable Use Policy by a User, PROPHET may in its sole discretion:

- a) Restrict or terminate a User's right to use the PROPHET Network;
- b) Withdraw or remove any material uploaded by that User in contravention of this Policy; or
- c) Where appropriate, disclose information to law enforcement agencies and take any legal action against a User for breach of this Policy, including but not limited to claiming all costs, fees and disbursements (including but not limited to legal fees) connected therewith.

In addition, where the User is also an employee of PROPHET, PROPHET may take such action, disciplinary or otherwise as it deems appropriate and which is in accordance with its contractual arrangements, terms of use or conditions of employment.

Definitions

PROPHET Network relates to all computing, telecommunication, systems, and networking facilities provided by PROPHET, with particular reference to all computing devices, either personal or PROPHET owned, connected to systems and services supplied.

Copyright

Breach of copyright is theft of property, and no aspect of PROPHET's copyright or the copyright of its licensors should be infringed. It is an infringement of copyright to make a copy of the PROPHET instrument, any part of the questionnaire, reports or online environment.

It is an offense to make a reproduction by any means of the following materials, whether or not the reproduced materials are sold:

- The PROPHET User Manual, Technical Manuals and related texts
- The PROPHET questions and all questionnaire items, whether singly or in a group
- Client reports
- The PROPHET website and online environment
- The PROPHET algorithm
- Profile charts as they appear on reports
- PROPHET brand and imagery
- Software programs and accompanying documentation
- Training materials

(This list is not intended to be exhaustive.)

PROPHET's copyrights and intellectual property are its most valuable property. Copyright protects the business's product. Any infringement of copyright severely affects the ability of PROPHET to operate economically. In the case of psychometric instruments, illegal copying of materials leads to poor control of its use, gives clients a bad impression, and can even disadvantage individual respondents.

It is also illegal to incorporate any of the components listed above into computer software used for the administration, scoring and interpretation of a questionnaire or instrument. The PROPHET Profile chart as it appears on published forms is also a copyright work, and it may not be used in a computer presentation system, even one that simply generates reports when data (scores) are input into a computer.

Governing law

This Privacy Policy is governed by English law and the place of performance of obligations will be England.

Information Classification Policy

PROPHET Profiling is a personality profiling organisation. As part of protecting its information and assets from unauthorised access and compromise or disclosure, PROPHET has adopted this information classification policy to help manage and protect its information assets.

All PROPHET employees and associates, in particular accredited users, share in the responsibility for ensuring that PROPHET information receives an appropriate level of protection by observing this Information Classification policy:

- Company Managers (Currently PROPHET's Board of Directors) or information 'owners' shall be responsible for assigning classifications to information assets according to the standard information classification system presented below. ('Owners' have approved management responsibility. 'Owners' do not have property rights.)
- All Company associates shall be guided by the information category in their security-related handling of PROPHET-related information.

All PROPHET data and information and all information entrusted to PROPHET from third parties falls into one of five classifications in the table below, presented in order of increasing sensitivity.

Information Category	Description	Examples
Unclassified Public	<p>Information that is not confidential and can be made public without any implications for PROPHET. Loss of availability due to system downtime is an acceptable risk.</p> <p>Integrity of any information on PROPHET made available to the public is important given PROPHET's intended adherence to the standards required for BPS registration and presenting PROPHET in the correct manner for appropriate use within businesses.</p>	<ul style="list-style-type: none"> • Product brochures widely distributed • Information widely available in the public domain, including publicly available Company web site areas • PROPHET downloads (sample reports) • Financial reports required by regulatory authorities • Newsletters for external transmission
Proprietary	<p>Information that is restricted to management- requiring approved internal access and protected from external access. Unauthorised access could influence PROPHET's operational effectiveness, cause an important financial loss, provide a significant gain to a competitor, or cause a major drop in customer confidence. This includes anonymised response data within the PROPHET database, used for the validation and submission to The British Psychological Society. It also includes copyrighted information, such as the report templates and user manuals and guides that are made available to anyone completing PROPHET and accredited users. Information integrity is vital.</p>	<ul style="list-style-type: none"> • Passwords and information on PROPHET security procedures • Anonymised response PROPHET database • Know-how used to process the PROPHET system and client information • Standard Operating Procedures used in all parts of PROPHET's business (including all copyrighted manuals and guides available to Accredited users) • All PROPHET-developed software code, used internally only (software code is not available externally)
Client Confidential Data	<p>Information received from clients in any form for processing in production by PROPHET. The original copy of such information must not be changed in any way without written permission from the client. The highest possible levels of integrity, confidentiality, and restricted availability are vital.</p>	<ul style="list-style-type: none"> • Client data and materials produced for client work • Electronic transmissions from clients • Services or information generated for the client by PROPHET
Company and	<p>Information collected and used by</p>	<ul style="list-style-type: none"> • Salaries and other personnel data

<p>Individual Confidential Data</p>	<p>PROPHET in the conduct of its business to employ people, to log and fulfil client services, and to manage all aspects of finance. Access to this information is very restricted within the company. The highest possible levels of integrity, confidentiality, and restricted availability are vital.</p> <p>PROPHET Reports that are purchased by client organisations do not contain personal data relating to contact details or sensitive personal data. They do contain names and PROPHET profile information associated with executive development.</p> <p>PROPHET Reports may be shared appropriately with others (e.g. team colleagues, HR and management) as part of a development initiative. This allows appropriate others to view individuals' profiles that are relevant to them. The accredited user communicates to respondents who will be able to view their personal profile or report/s and how reports will be shared, in advance of completing a PROPHET Profile. Respondents are also alerted to how profiles are shared as part of team development, via standard email communication sent by PROPHET when inviting someone to complete their Profile.</p>	<ul style="list-style-type: none"> • Accounting data and internal financial reports • Confidential customer business data and confidential contracts • Non disclosure agreements with clients\vendors • Company business plans • Company and individual PROPHET Reports and access passwords to those reports
<p>Personal data</p>	<p>This is the personal data that respondents submit when completing a PROPHET Profile, including some sensitive personal data e.g. gender, ethnicity. This data is used for processing personal PROPHET profiles for development purposes only. Personal data can be removed, if a person requests this to PROPHET. In this event, they would no longer be able to access their Profile. Where there is no request to delete personal data, PROPHET retains personal data for a 6-year period which begins after the termination of the relationship or contract between either PROPHET and the organisation / individual</p>	<ul style="list-style-type: none"> • Root Personal data of respondents that is collected when someone consents to and completes their PROPHET Profile

	<p>client. This is to ensure people’s Profiles are kept, for example, as they move between jobs.</p>	
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Corporate Accounts and Accredited Users of PROPHET – Understanding the responsibilities of Data Processor and Data Controller

Any user of PROPHET Profiles and Reports, (i.e. an Organisation or Accredited User or Authorised user who may order and administrate a Profile or Report on behalf of an Accredited User) is the data controller of the Profiles and Reports that they order - and PROPHET is the data processor. This section outlines these roles and responsibilities and the governance issues that have to be addressed to ensure data protection compliance.

Overview

It is essential for organisations involved in the processing of personal data to be able to determine whether they are acting as a data controller or as a data processor in respect of the processing. This is particularly important in situations such as a data breach where it will be necessary to determine which organisation has data protection responsibility.

The data controller must exercise overall control over the purpose for which, and the manner in which, personal data are processed. However, in reality the data processor, PROPHET, also exercises some control over the manner of processing. E.g. over the technical aspects of how a particular service is delivered.

The DPA draws a distinction between a ‘data controller’ and a ‘data processor’ in order to recognise that not all organisations involved in the processing of personal data have the same degree of responsibility. It is the data controller that must exercise control over the processing and carry data protection responsibility for it.

“data controller” means a person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data are, or are to be processed. The Organisation / Accredited User is the Data Controller, as it will determine for whom, when and how PROPHET Profiles and reports are used.

“data processor”, in relation to personal data, means any person (other than an employee of the data controller) who processes the data on behalf of the data controller. PROPHET will “process”. Processing in relation to information or data means obtaining, recording or holding the information or data or carrying out any operation or set of operations on the information or data, including—

- a) organisation, adaptation or alteration of the information or data,
- b) retrieval, consultation or use of the information or data,
- c) disclosure of the information or data by transmission, dissemination or otherwise making available, or
- d) alignment, combination, blocking, erasure or destruction of the information or data

The data processor's activities in this instance are the more 'technical' aspects of an operation, such as data storage, retrieval or erasure. Activities such as interpretation, the exercise of professional judgement or significant decision-making in relation to personal data must be carried out by a data controller. Under the terms of contracts that PROPHET holds with Accredited users and Organisations, they agree to engage or employ Accredited Users to fulfil these duties.

This is not a hard and fast distinction and some aspects of 'processing', for example 'holding' personal data, is common to the controller and the processor. The Data and Privacy Policy of PROPHET sets out how PROPHET will control the data that it holds.

The Data Controller

The data controller determines the purposes for which and the manner in which personal data is processed. The data controller exercises overall control over the 'why' and the 'how' of a data processing activity. To determine whether you are a data controller you need to ascertain which organisation decides:

- to collect the personal data in the first place and the legal basis for doing so;
- which items of personal data to collect;
- the purpose or purposes the data are to be used for;
- which individuals to collect data about;
- whether to disclose the data, and if so, who to;
- whether subject access and other individuals' rights apply i.e. the application of exemptions; and
- how long to retain the data or whether to make non-routine amendments to the data.

These are all decisions that can only be taken by the data controller as part of its overall control of the data processing operation.

The Data Processor

Within the terms of the agreement with the data controller, and its contract, a data processor (PROPHET) may decide:

- what IT systems or other methods to use to collect personal data;
- how to store the personal data;
- the detail of the security surrounding the personal data;
- the means used to transfer the personal data from one organisation to another;
- the means used to retrieve personal data about certain individuals;
- the method for ensuring a retention schedule is adhered to; and
- the means used to delete or dispose of the data.

These lists are not exhaustive, but illustrate the differences between the controller's and the processor's roles. A processor has the freedom to use its technical knowledge to decide how to carry out certain activities on the data controller's behalf. However, it cannot take any of the overarching decisions, for example what the personal data will be used for or what the content of the data is. Such decisions must only be taken by the data controller.

Under the DPA all the legal responsibility for compliance falls directly on the data controller and not on the data processor.

All personal information collected in the Preliminary questions when an individual completes the PROPHET questionnaire (including: gender, age banding, region, ethnicity (only if in UK), seniority, email address) – this information is only ever used by PROPHET and for the purposes of PROPHET ensuring fairness of the instrument across groups, as part of submission to and registration with the British Psychological Society. This information shared in response to these Preliminary question is not shared with Accredited Users or any other party.

Notwithstanding the respective responsibilities of the Data Controller and Data Processor, PROPHET's Data and Privacy Policies outline how PROPHET protects the data of respondents and users of PROPHET.

How you can contact us

This is the privacy policy of PROPHET Profiling Limited. PROPHET is registered with the UK Information Commissioner's Office, as data controller (as defined by the Data Protection Act 2018) in respect of personal data collected by and/or transferred to us.

If you have any questions about PROPHET's privacy policy, or wish to opt out of direct marketing or you wish to update or request any information about or copies of your personal data held by us, please e-mail: prophet@prophetprofiling.com; or telephone: +44 (0)207 440 3000; or write to us at:

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

If you have a complaint regarding any matter under this privacy policy or how PROPHET handles data, you may contact us, in the first instance, at the above address. You may also contact the Information Commissioner to complain.

Changes to this policy

This privacy policy was updated in April 2019. It covers PROPHET Profiling and PROPHET reserves the right to modify or update the policy from time to time.

PROPHET Profiling
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Registered in England and Wales Company Number 03665491

PROPHET Profiling, Updated: 1 April 2019

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