

# Privacy policy

## Introduction

With this privacy policy, we would like to describe the ways in which we collect and use the information you provide to lamProgrez using our products, as well as how you have full control over what you want to share with lamProgrez. This privacy policy will cover the following subjects:

- The goal of our services and the necessity of collecting personal information
- What personal information we collect
- Why we collect this personal information
- With whom we share your personal information
- With whom we explicitly do not share your personal information
- How we protect your personal information
- Our responsibility for third party websites
- Our policy towards children
- Your right to access your own personal information
- Your right to be forgotten

Transparency and clarity regarding the usage of your personal information is of the utmost importance to us. If you may have any question or remark relating to our privacy policy or services, do not hesitate to contact us by sending an e-mail to <u>privacy@iamprogrez.com</u>. We are happy to help!

## The goal of our services and the necessity of collection of personal information

We offer assessment services to our customers. We also deliver the results of the assessment to you, as a user, so you can add it to your own curriculum.

## What personal information we collect

Information we need to collect for the correct functioning of our services

To be able to offer lamProgrez services, we only need a limited amount of personal information to complete your profile. This includes your first name, last name, e-mail address and a hashed password. In case you used one of the Single Sign-on services to create your account, we only store the ID of the Single Sign-on service for login purposes and we gather and display your first name, last name and e-mail address as available within the chosen service.

<u>Information you may provide to complete your profile, but to which you are not obliged</u> Additionally, you can choose to share more personal information (but there is no obligation to do this), to complete your profile even further. This information is only used by the organisation you filled the assessment for to select the right candidate within a recruitment process, to determine a perfect team composition, for you to use the created profile as your own curriculum vitae, or anonymously by lamProgrez for the training of our artificial-intelligence engine. The information you can provide optionally exists of the following:

- Address
- Birth date
- Gender
- Driver's license
- Educational background
- Employment background
- Volunteering background
- Personal development background

In case you use Github Single Sign-on, we also collect the following information:

- Recent Github events
- Public projects you worked on
- Scripting languages you used within these projects

## Assessment analysis by lamProgrez

The answers you give during the assessment are merely used for the determination of your soft skill profile and the strengthening of our assessment model. This is done in several ways;

- scoring of multiple choice answers,
- interpretation of open answers by our own artificial-intelligence engine,
- interpretation of text concepts, sentiment, emotions and keywords by the cognitive services offered by our service providers.

## Why we collect this personal information

- To provide you with a personal soft skill profile you can add to your curriculum.
- To provide the organisation you filled the assessment for with your profile as part of the recruitment process or for research purposes.
- To provide the organisation you filled the assessment for with your contact details, if you shared these with them, to contact you when they are interested in your profile.
- To provide lamProgrez and the organisation you filled the assessment for with anonymous usage statistics regarding the assessment.
- To provide lamProgrez with contact details to inform you about important information directly related to your account.
- To provide lamProgrez with anonymous data for the training of our artificial-intelligence engine which is used to improve the quality of our services.

## With whom we share your personal information

## <u>Our customers</u>

The personal information you provided in your account are only available to the organisations you have linked your account with through their assessment. You give this consent when registering a new account or when logging into an assessment of a new organisation with an existing account.

## <u>Our service providers</u>

To be able to offer our services we work with several service providers. Most of the service providers only serve as a secured gateway for your data, they won't be able to see your personal information. Special attention goes out to our database service provider, by whom the personal information is stored on encrypted disks. Non-traceable, anonymous information is shared with our artificial-intelligence engine cloud provider as well as the service provider for our cognitive services, with the sole purpose of enriching and strengthening the assessment results.

## <u>Other parties</u>

Only if we are obliged to share personal information on a legitimate basis, e.g. in case of a legal conflict, we will share personal information, limited to the information strictly needed for that specific case and only shared with these parties directly related to the case.

Anonymous, non-traceable information, including information relating to the usage of our services could be shared with third parties if it involves research or data analysis. The selection of these third parties will comply with the high standards we set relating to the selection of service providers and the protection of your data.

## With whom we explicitly do not share your personal information

We believe in only collecting and sharing information for the sole purpose of the assessment, to improve the results for you and others. That's why we;

- will not share your personal information with third parties for personal or direct marketing, personal or direct advertising to you or any purpose other than the ones that hold a legitimate reason to offer our services to you as a user or to our customers.
- will not share your personal information with our other customers, other than the ones you
  gave your consent for when creating your account or linking your account with their
  assessment.

## How we protect your personal information

lamProgrez has put in place several technical and organisational mechanisms to protect your personal information. The information you provide is transmitted over a secured and encrypted connection (SSL). Besides that, we only use trusted and certified service providers and cloud partners, of which datacenters are based in the European Union, to store your information. These services are all protected with two-factor authentication to limit the risks of unauthorised access. Strict regulations and policies regarding accessing personal information by our employees are in place to protect your data and to ensure integrity.

## Our responsibility for third party websites

It could be that within our products there exist links to external websites that reside outside of lamProgrez' span of control. We are not responsible for the sharing of personal or other information through these external websites as, other than the usage of our Single Sign On services, no data is unknowingly transferred between ours and these external sources. Please refer to their privacy policy to see how they process your data.

#### Our policy towards children

Our services are not directed to individuals under the age of 16. We do not believe that we are holding any personal information of children under the age of 16, other than the personal information for which we are the sole processor of personal information and for which the responsibility of this data and consent resides with the controller. If there is any reason to believe that an individual under the age of 16 has provided us with personal information, we will terminate this account and delete the provided information immediately.

#### Your right to access your own personal information

It is possible to request all your personal data we hold in a readable format. If you request so, we provide this information to the e-mail address we have in our records within thirty days after you received written confirmation of receival from us. You can raise such a request by sending an e-mail to <u>privacy@iamprogrez.com</u>, which should contain at least your name and the e-mail address of the account you want to retrieve your personal data from.

#### Your right to be forgotten

Of course you are able to request permanent deletion of your account and personal information. When you do so we make sure we destroy and remove your account from our records. The provided assessment data which was already anonymously processed will only reside, for the single goal to be used as training and verification data for our artificial-intelligence engine. If you would like your account to be permanently deleted, you can raise such a request by sending an e-mail to <u>privacy@iamprogrez.com</u>, which should contain at least your name and the e-mail address of the account that needs to be permanently deleted. We then start the verification and final deletion process, which will take a maximum of thirty days after you received written confirmation of receival from us. We will only use your e-mail address one time to confirm the permanent deletion of your account.

To this privacy policy, Dutch law applies.