

# Website Privacy, Cookie Notice and Data Protection Policy in compliance with GDPR by IWD Europe

(French Notification N° 2193632 – Commission Nationale de l'Informatique et des Libertés – CNIL)

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IWD Europe ("we" or "us") wants to inform you about the ways we process your personal information. In this Privacy & Cookie Notice we explain what personal information we collect, use and disclose.

Personal information means any data relating to an individual who can be identified, directly or indirectly, based on that information. This may include information such as names, contact details, (online) identification data, online identifiers, or other characteristics specific to that individual.

This Privacy & Cookie Notice applies when you visit our websites, solutions and other services, including events that refer or display a link to this notice ("Services"). This Privacy & Cookie Notice may be supplemented or replaced by additional privacy statements or terms provided to you.

The present information is designed to address issues or questions from readers and users - Clients, Partners and Suppliers - regarding our approach to General Data Protection Regulation (GDPR), according to EU regulation N° 2016/679 of April 27, 2016, into force with effect from May 25, 2018.

We know that you care how information about you is used and safeguarded. Our primary purpose in collecting, processing and saving assessment data is to provide valuable and helpful information for the development of individuals, leaders and teams operating within their respective organization or work environment. All information collected is considered confidential.

By visiting <a href="https://www.iwd-europe.com">www.iwd-europe.com</a> and (namely) completing assessment questionnaires that we distribute, connecting to online assessment sites from our exclusive Partners, Authors and original Publishers, you are accepting the practices described in this Privacy and Data Protection Notice.

According to GDPR requirements, all legal dispositions have been taken into account by the Data Protection Officer and Processing Representative and integrated into our processing register.

# What We Collect and How We Use It

Your participation in assessments with tools that we provide is entirely voluntary and well-informed, noting that we adhere to the guidelines developed by the International Test Commission in accordance with the American Psychological Association, and the Australian Psychological Society Code of Ethics pertaining to data collection for applied research and operation with end-users.

When taking one of our assessment questionnaires commencing or ending the assessment, we may ask you to tell us a bit about yourself as part of demographics set of data (for example your age, gender, country and occupation). We use this to generate information that enables us to establish benchmarks (psychometric norms related to areas of studies and surveyed populations) allowing us to compare your results to those of others like you. While adding relevance and value to our products, providing these set of data is optional and will not be included in your individual or group profile reports.

We do not collect the IP address of your internet connection. Once forwarded to you, your email address and your personal data are not stored either by IWD Europe or its exclusive publishing Partners beyond 24 months. We will never share your individual responses or scores to others. If at all, your scores and responses will be disclosed in publications, lectures, and web sites only in summaries of groups of people.

You retain the right to request that your data be deleted. We do not collect information from children under 18 years.



### What We Share, with Whom

We partner with authors and original publishers to conduct research and help advance the science of standardized assessment instruments. We share de-identified data and demographics only with exclusive publishers. Researchers will not receive your name and will not be able to match you to your survey results or other data for which we do not use cookies. IWD Europe and his exclusive publishing partners only have direct and full access to end-user or Client database (with on-line service). Other business partners acting as accredited Practitioners and Clients as concerned or targeted end-users have restricted access to off-line database only (such as printed reports or pdf files).

For the development and maintenance of our web sites, we contract with Information technology professionals who may require access to the data collected on these sites, solely for the purpose of assisting in the operations of these web sites and not for any commercial purpose. These individuals are bound by strict confidentiality requirements and agreements.

IWD Europe will comply with the European Economic Area and the Swiss data protection laws regarding the use, collect, transfer, retention, and other processing of Personal Data from the European Economic Area (GDPR) and Switzerland as well as from the Federal Data Protection Act (FDPA) in force in the United States of America.

#### **Security of the Data We Collect**

We collect your responses to our assessments questionnaires and store these on dedicated and protected database server. We take reasonable technical, administrative, and physical precautions to keep your information secure. For example, we store your responses in a password-protected database and all submitted data is encrypted with 256-bit encryption SSL (secure sockets layer) certification, which prevents interception of personal information while in transit.

The website and database themselves are stored in secure data centers with 24/7 monitoring and security procedure in place, currently located outside the European Union in Virginia (USA) / Amazon Warehouse Services (AWS) for CDP and EMP assessments, in Sydney (Australia) for R@W assessments and Abbotsford (British Columbia - Canada) for the complete suite of proprietary instruments provided by Consulting Resource Group (CRG). If a data breach occurs, notification of the breach and its extent will be made known to those affected, taking earliest possible remedial actions, also compliant with legal provisions of the Federal Data Protection Act (FDPA) in force in the United States of America, of the Australian Privacy Act (APA) and Privacy Principles (APPs), as well as the Personal Information Protection and Electronic Documents Act (PIPEDA) in Canada.

### General newsletters and updates

We send updates on our work to accredited practitioners or parties who have had contact with us and have shown interest in our work. We do not share our mailing lists or contacts unless we have your written permission to do so.

#### The Use of Cookies

We use cookies to optimize our websites and analyze website traffic. On occasion, we may use third party cookies, notably social media plugins, to enable you to share ideas and information related to us instantly and for own marketing purposes.

Cookies or similar techniques (referred to collectively as "Cookies") are small text files or pixels, which might be stored on your computer or mobile device. Cookies may be necessary to facilitate website browsing and making it more user-friendly. Third party Cookies may also collect information to analyze personal browsing behavior.

If you do not want cookies to be stored, then you may turn off certain cookies individually or you can select the appropriate options on your web browser to delete some or all cookies. Please note, however, that if you block some or all cookies (including essential cookies) you may not be able to use or access all or parts of our websites, such as being able to log on to member-specific areas.



#### **Links to other Websites**

Our websites may contain links to third-party websites, which may have privacy notices that differ from ours. We are not responsible for the collection, processing or disclosure of personal information collected through other websites.

We are also not responsible for any information or content contained on such websites. Links to other websites are provided solely for convenience. Your usage and browsing on any such website is subject to that website's own policies. Please review the privacy notices posted on other websites that you may access through our website.

IWD Europe may provide you with additional or different privacy notices in specific instances on how your personal information is collected and used for a specific Service.

## **Changes to Policy**

We retain the right to change this Privacy and Cookie Policy as part of the Data Protection Statement. If we do, the revised Privacy and Data Protection Policy would apply only prospectively to future data collected. We will post changes to this page in a prompt manner with a new date to this Privacy and Data Protection Statement. This statement is **effective as of 1st July 2018 and updated on September 2024**.

In order to ensure your rights to data privacy and protection, you may ask us at any time about the information collected about you and request to exert your right either for correction or cancellation.

#### **HOW YOU CAN CONTACT US**

If you have any questions about how we process your personal information or if you want to exercise one of your rights, you can contact us at: <a href="mailto:service@iwd-europe.com">service@iwd-europe.com</a>.

If you feel we are unresponsive or disagree with our data privacy practices, you can also file a complaint with your national Data Protection Authority.

In response to a request, we might ask you to verify your identity if needed, and to provide information that helps us to understand your request better. If we do not grant your request, whether in whole or in part, we will explain why.

These dispositions being subject to change for their legal and regulatory clauses set forth by the French authority of control overseeing Personal Data Protection (CNIL), we recommend that you should check this information note regularly.