

## Data Protection Notice Aspiring Minds (SHL) Last Update February 2022

### What we need?

We as DTAG (acting as a **Data Controller**) with all our interlinked providers and sub providers like **Aspiring Minds (SHL)** (acting as a **Data Processor** on our behalf) need to inform you on the process of testing.

For the purpose of this test, Aspiring Minds (SHL) does not need to collect any of the personal data from you. Please note that you do not need any personal data to log in in the system, so that no one could identify you. The test results alone cannot be used for the identification.

On the other hand, Aspiring Minds (SHL) is processing all the personal data, when needed, fulfilling the highest standards of data protection and information security based on, but not limited, to the regulation EU GDPR 2016/679 (Regulation (EU) 2016/679 of the European Parliament).

### Why we need it?

Aspiring Minds (SHL) is acting as a processor (service provider) for the skill assessment on behalf of DTAG. The Aspiring Minds (SHL) tests are to be completed for the process defined by us for the purpose of Recruiting and Development. DTAG can take the results of the Aspiring Minds (SHL) test into consideration in the selection or development process.

Programming ability is one of the parameters evaluated by a coding simulation task. This is the Machine Learning score that is determined using the control structures and data dependencies. Logical correctness of the written code is evaluated in this section.

This use of AI is consistent with the purpose limitation that has been established for this platform and covers only this sub-area of scoring incomplete code on logical correctness and quality in online coding simulations. Apart from this functionality, there is no further application of AI. AI is not used by Aspiring Minds (SHL) to generate automatic decisions, not even for profiling.

The test result does not lead to an automatic decision in terms of recruiting or development. The decisions based on the test result are made individually by the persons who invited you to the test. For more information on the need of such processing, you should contact the person from whom you have received the demand for the testing.

In order to fulfil the purpose determined by DTAG (acting as a Data Controller) Aspiring Minds (SHL) needs to process the answers given and executed coding simulations in the testing and provide the results to DTAG.

The participation in the test is voluntary. No participation does not lead to any disadvantages.



## What we do with it?

Candidate Data: You access the test with the URL, User-ID, Password provided for you. After it, you sign in with the Candidate-ID (also provided for you within the invitation).

Assessment Data: After you have completed the test(s), the system generates and makes available the test results for the DTAG (in this case DTAG- Recruiting, DTAG-HR, and DTAG-Business). DTAG matches the test results with your contact details, using its internal tracking key processes.

**Opposition proceeding: RELEVANT outside Germany**, for the use of the tests for the purpose of **development**: In case you disagree with the uploading of your test-result in the HR-Suite or other ATS (applicant tracking system), please address this request to the person from whom you have received the demand for the testing. If you object the upload of the result report, it leads to the consequence that result report is not used and is not taken into consideration. Finally, this can cause the process to be interrupted.

Aspiring Minds (SHL) stores the pseudonymized report for a period of 6 months. The anonymized raw test results are stored for the purpose of increasing the accuracy of the norm groups.

The technical information collected by Aspiring Minds (SHL) - browser type, operating system, IP-address, date (time stamps) - are stored to provide technical support to you and the Employer as well as individuals who reach out to Aspiring Minds (SHL) using their web help form. Aspiring Minds (SHL) has a legitimate business interest in understanding how their assessments are accessed, how they are used, and any problems users have with them across multiple devices.

Aspiring Minds (SHL) store your Personal Information in data centres located in Germany and backed up in Ireland. SHL affiliates also transfer your Personal Information within the Europe Economic Area (“EEA”).

Additionally, your Personal Information is transferred to the United States, India, South Africa, and United Kingdom (“**SHL Non-EEA Processing Locations**”) where a limited number of personnel in our SHL Non-EEA Processing Locations, as well as our trusted third-party vendors and service providers, have access to Personal Information in order to provide services. As the SHL Non-EEA Processing Locations are in countries which do not have equivalent data protection laws to those applicable in the EEA Aspiring Minds (SHL) have an Intragroup Agreement in place, signed by all SHL affiliates, which contains the European Union (EU) Standard Contractual Clauses (**SCCs**) which have been approved by the EU data protection authorities for the transfer of data outside the EEA. Their third-party vendors and service providers are also required to sign up to SCCs in accordance with Article 46 of the General Data Protection Regulation. All SHL affiliates have the same technical, physical, and administrative security controls and are required to comply with our data protection policies and procedures, applicable laws, governing the collection and use of personal information.

No other third-party providers have access to the test data, unless specifically required by law and even in this case, they are processed by the explicit consent of the Data Controller as defined by the regulation EU GDPR 2016/679.



### **How long we keep it?**

The pseudonymized log in data and the test report will be deleted by Aspiring Minds (SHL) after 6 months.

Aspiring Minds (SHL) keeps the anonymized raw test results and technical data for a maximum of 7 years.

On the DTAG side, the data will be deleted automatically after 6 months.

### **What are your rights?**

Should you believe that any personal data we might hold on you is incorrect or incomplete or subject to any other cause, you have the ability to request to see this information, rectify it or have it deleted. For the most efficient of action, please contact the Data Controller directly.

By continuing with the test, the information given above is automatically approved.

You can withdraw your agreement at any time by contacting us and your data will be deleted.

Please do not hesitate to contact us for any further questions.

Contact: [eignungsdiagnostik@telekom.de](mailto:eignungsdiagnostik@telekom.de)

