



## **16pf.com PRIVACY POLICY**

This is the Privacy Policy for the 16pf.com website, concerning all operations related to the (i) 16pf<sup>®</sup> instrument and (ii) Hilson<sup>™</sup> and public safety related suite of products, and related goods and services, of The Institute for Personality and Ability Testing, Inc., a corporation incorporated in Delaware, USA with its principal place of business at 11590 N Meridian St, Suite 200, Carmel, IN 46032, USA and its associated company IPAT Holdings Limited with its principal place of business at Clarendon Business Centre, Clarendon House, 52 Cornmarket Street, Oxford OX1 3JH, each subsidiaries of Performance Assessment Network, Inc. (together, the PAN Group).

The PAN Group is committed to protecting and respecting your privacy, and to acting in compliance with applicable national, state and federal privacy legislation and regulations including the Data Protection Act 1998, where appropriate, in relation to personal data in connection with the PAN Group's operations in the UK, and in compliance with other applicable regulations, as amended and applicable from time to time. For ease of reference, references herein to "personally identifiable information" or "PII" are deemed to include reference to personal data, as defined within the Data Protection Act 1998.

Simply visiting the 16pf.com website does not require you to reveal personally identifiable data. But if you ask us for information, order goods or services, register with us, use our services or report a problem, we collect any personally identifiable information you submit to us, and details of the transactions between you and us. In addition, we store information you may give us about your interests, or we may learn about these from your use of our goods and services. This policy explains how we collect, use and process the data that you give us.

We adopt a layered approach to privacy matters of which this 16pf.com Privacy Policy is one aspect. We also have various operational systems in place where data are collected and in relation to its use and storage.

Please do not send us any personally identifiable information about anyone else without their permission. By sending us personally identifiable information about others, you confirm you have permission to do so.

Whenever you give us personally identifiable information, you are consenting to its collection and use in accordance with this 16pf.com Privacy Policy.

This 16pf.com Privacy Policy comprises:

- What data we may collect from you
- How we will use your data
- Data anonymization
- Your right to opt out of direct communications
- How we use cookies
- How we keep your data secure
- Who we will share your data with
- Links to other sites
- How you can contact us
- How you can obtain data we hold about you
- Changes to this policy
- Governing law

## What data we may collect from you

The data that we collect from you may include information:

- you provide when you request our goods and services;
- you provide when you complete forms on our site or for our goods and services, including registering to use our site, subscribing to our services, submitting instrument qualified user qualification data, posting material or using further services, including registering for use of, and using, our internet-based scoring and delivery platforms, NetAssess and NetAssess International (NAI), or our other online scoring systems including OnSite Pro 2 (together 16pf Systems) and also information provided through the completion of our psychometric instrument questionnaires, or otherwise;
- you submit when you enter a competition or promotion sponsored by us;
- you provide when you contact us or report a problem to us; or complete a survey that we use for research purposes;
- about transactions you have entered into through our site or other orders placed with us; and
- about your visits to our sites (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 by using cookies. We may also collect information about your computer, including, where available, your 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 these data.

## How we will use your data

The personally identifiable information that we collect is used:

- to provide you with goods and services that you request from us;
- for contacting you with information about our other goods and services in which you may be interested, including our catalogue and our regular newsletters and other communications, and, where relevant, information on organizations outside the country of operations who are authorized to offer goods and services, where you have consented to be contacted for such purposes;
- to provide, on request, personalized computer-generated reports from completion of our psychometric instrument questionnaires, including via those applicable 16pf Systems, or otherwise;
- 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 personalize our service to you, including ensuring that content from our site is presented in the most effective manner for you and your computer;
- to seek your views on products and services;
- to enable you to participate in interactive features of our service, when you choose to do so, including live chat features; and
- for technical administration of our sites including notifying you about changes to our service.

We also:

- use data collected through completion of our psychometric instrument questionnaires, including via those 16pf Systems which collect data, for research purposes in order to produce statistics of the type described in our technical product manuals, e.g., psychometric norms and validity data. You may be asked, as part of the testing process, to give your consent to the collection of your personally identifiable information for research purposes, and to answer additional research questions. If you decline from doing so, certain data are not collected or used for research purposes. If you do consent, the personally identifiable information collected will only be used for research purposes and only in non-person-specific form (anonymized and aggregated); and
- automatically collect data about visitors to our site (for example on browsing patterns) by using cookies.

In both these cases, the data are stored and used thereafter only in a non-person-specific form; no individual is identified or identifiable from any published research data.

## **Data anonymization**

Every individual has rights as to how their personally identifiable information is handled, and we recognize the need to treat the collection, use and storage of all such data in an appropriate and lawful manner, according to the classification of such data. Personally identifiable information is subject to certain legal safeguards as specified in national, state and federal legislation, including under the UK Data Protection Act 1998. At the PAN Group, all data (personally identifiable, protected health information (PHI) and otherwise) that we collect as a result of use of applicable 16pf Systems, or otherwise through registering for and using our services, is handled in accordance with this 16pf.com Privacy Policy, and our 16pf.com General Terms of Business in the manner set out in our internal information security policies and procedures and data retention and destruction procedures.

These policies and procedures set out the types of data that the PAN Group collects and the retention periods, archive periods and also destruction method for such data, and provide that personally identifiable information 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 our systems when no longer required. In accordance with such policies, procedures and associated processes, psychometric test respondent data specifically, collected as a result of use of applicable 16pf Systems or otherwise), which is personally identifiable information and may include protected health information, is generally retained for a period of at least seven (7) years after which it is anonymized and aggregated therefore no longer existing in personally identifiable information format. This includes any research data retained (in order to produce statistics of the type described in our technical product manuals, e.g. psychometric norms and validity data).

## **Your right to opt out of direct communications**

If you do not wish the PAN Group to use your personally identifiable information for direct marketing of our goods and services, you can unsubscribe using the link in any email you have received from us or you can notify us in writing either by email to [custserv@panpowered.com](mailto:custserv@panpowered.com) (for US and Canada) and [custservGlobal@panpowered.com](mailto:custservGlobal@panpowered.com) (for UK, EU and rest of world) or letter (see "How you can contact us" for information on contacting us by mail).

You can manage the direct marketing that you receive from us by signing up to the specific information that you wish to receive.

Please note, however, that occasionally we may need to communicate with you for administrative or operational reasons and therefore whilst you use our goods and services and continue to wish to do so, it is not possible to opt-out of all communications with us.

## **How we use Cookies**

'Cookies' are pieces of information in the form of small files stored by a user's web browser on your hard drive, when you visit websites. Cookies help to identify the user when he or she visits a particular web page; this enables the website to work more efficiently and your visit to be personalized, for example, to simplify the login process for registered users. They 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.

Whilst cookies and the information they transmit may not identify a living individual when taken on their own, it may be possible to do so in combination with other information held by the owner of the site or a third party. The 16pf.com website, along with most other major websites, uses 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, if you do this, it will restrict the services you can use or our site may not work for you as well as we intend or at all. You can view more information about cookies at [www.aboutcookies.org](http://www.aboutcookies.org) where you will also find information on how to delete cookies from your computer.

We use analytical and functionality cookies to allow us to recognize and count the number of visitors to our site and to see how visitors use the site, to enable us to improve how our site works. 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 you having to re-enter information. Persistent cookies are cookies which remain on the hard drive of your computer after you have visited the website. These help us to identify you as a unique visitor and enable us to recognize you on future visits. No information is passed to third parties for marketing purposes although we may share information with third parties but only in relation to providing web or other services to you connected to the service we provide.

We may also collect information about your computer, including where available, your IP address, operating system and browser type, for system administration and to report aggregate information. This is statistical data about our site users' browsing actions and patterns, and does not identify any individual.

We use cookies in order to:

- give us information about the number of visitors to different parts of our site and how visitors use the site;
- enhance your visit to our site, facilitate user administration including detection of mobile devices and to provide you with content tailored to your interests based on your usage of the site;
- ease your browsing experience by optimizing and improving the use of web forms, analyzing user behavior to improve usability of the site and track your preferences;
- enable you to order our goods and services through our online shop, including use of a shopping basket;
- administer a customer online account, including remembering log-in details and language selection for 16pf Systems and other applications; and
- understand how our online advertising and marketing campaigns and promotions are working in order to improve our site design and offers and promotions, and to assess the effectiveness of our marketing campaigns.

We use first party cookies set by ourselves only. Please note that 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 our website.

### **How we keep your data secure**

We are committed to ensuring the security and integrity of personally identifiable information that we hold and acting in compliance with US privacy requirements and have put in place appropriate technical and organizational 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 you give us personally identifiable information 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 US and Europe (many of whom do not have stringent privacy laws). When we collect personally identifiable information through our psychometric instruments, if this is sent outside the US in relation to US operations and/or outside the European Economic Area (EEA) in relation to UK and EU operations, we take all reasonably necessary steps to ensure that your data are treated securely and in accordance with this 16pf.com Privacy Policy, including ensuring that the recipients to which it is sent have similar privacy regimes to ours. Further information on certification under the US-EU and US-Swiss Safe Harbor programs, and the PAN Group's undertakings between affiliated companies under EU standard contractual clauses for transfers of data (also referred to as the model contract), can be found later in this 16pf.com Privacy Policy.

Whenever and wherever we collect, process or use personally identifiable information, we take steps to ensure that it is treated securely and in accordance with our 16pf.com 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.

Personally identifiable information collected through applicable 16pf Systems is generally retained for a period of at least seven (7) years, after which it is anonymized and aggregated therefore no longer existing in personally identifiable information format. This includes any research data retained on 16pf Systems prior to research use. Other data are retained for periods in accordance with applicable law and regulation. Deletion, retention and destruction of data are dealt with in accordance with our data retention and destruction procedures.

You should note that where we have given you (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, you are responsible for keeping the username and password confidential. You should not share these details with anyone.

### **Who we will share your data with**

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

- as necessary to service your account and/or fulfil your order(s) for our goods and services and to validate your payment details;
- to suppliers and licensors that process data on our behalf;
- to companies affiliated to companies within the PAN Group i.e. within any group of associated companies;
- in response to an expressed client need, interest or request, to organizations outside the UK and EU and/or US who are authorized to offer PAN Group goods and services;
- in the event that we sell or buy any business or assets, including selling our business or assets; and
- where we believe, in good faith, that it is necessary to comply with federal, state or other applicable law or regulatory obligation or to protect the safety of the PAN Group, our customers or their clients, or the public, or to enforce or apply our 16pf.com [General Terms of Business](#) or other contracts. This may include exchanging information with other companies or organizations for the purposes of fraud protection and credit risk reduction.

Some of these third parties may be located outside the US in relation to US operations and outside the European Economic Area (EEA) in relation to UK and EU operations, for example credit card processing companies or IT service suppliers or licensors and therefore data may be transferred to, or stored at, or processed in, a destination outside the US and/or the EEA as applicable. Where personally identifiable information is transferred outside the US and/or the EEA as applicable, we take all reasonably necessary steps to ensure that your data are treated securely and in accordance with this 16pf.com Privacy Policy, including, where applicable, by ensuring that the recipients to which it is sent are either "safe" countries with similar privacy regimes to ours, or are covered by US/EU Safe Harbor Privacy Principles certification or equivalent protection where applicable, including the entering into of EU standard contract clauses for transfers of data (model contract) and monitoring such protections to which ensure the adequacy of privacy measure. By submitting your personally identifiable information to us, you agree to this transfer, storing and processing.

Where an individual takes one of our instruments under the direction of one of our qualified customers, and the PAN Group performs a service scoring of that instrument for the customer, we will send the individual's results to that customer in order that they may give appropriate feedback to the individual who took the instrument.

We may also provide your personally identifiable information to anyone to whom our business or business assets are transferred. We may also disclose non-person-specific information (in aggregated and anonymized form) for marketing, product development, strategic or research purposes. In such data, no individual will be identified or identifiable.

### **Compliance with privacy legislation and regulations, including in relation to foreign transfers**

In relation to operations related to the (i) 16pf instrument and (ii) Hilson and public safety related suite of products, and related goods and services, we seek to comply with the UK Data Protection Act 1998, where appropriate, and in compliance with other applicable regulations, as amended and applicable from time to time.

Where we collect and store any PHI, in respect of operations related to the (i) 16pf instrument and (ii) Hilson and public safety related suite of products, the PAN Group has procedures in place to specifically protect such PHI including:

- when using, disclosing, or requesting PHI, the PAN Group limits access to the information to the person(s) required to accomplish the intended purpose of the use, disclosure, or request;
- all PAN Group employees are trained, as necessary and appropriate, to protect PHI while carrying out their functions;
- to protect the privacy of the PHI of clients, the PAN Group has in place appropriate administrative, technical, and physical safeguards; and
- the PAN Group applies appropriate sanctions against any staff member who fails to comply with its privacy requirements. These sanctions may not however be applied against an individual who is testifying, assisting, or participating in an investigation, compliance review, or other legal proceeding.

The PAN Group complies with the US-EU Safe Harbor Framework and the US-Swiss Safe Harbor Framework as set forth by the US Department of Commerce. The PAN Group has certified with the US Department of Commerce that it adheres to the Privacy Principles under such Safe Harbor programs.

Furthermore, relevant PAN Group companies (Performance Assessment Network, Inc., IPAT Holdings Limited and The Institute for Personality and Ability Testing, Inc.) have entered into EU standard contractual clauses for transfers of data (the model contract), ensuring adequacy of privacy measures in accordance with EU data protection principles, including undertakings to act in respect of PAN Group data as such relates to operations related to the (i) 16pf instrument and (ii) Hilson and public safety related suite of products, and related goods and services, in accordance with our privacy and information security measures.

These mechanisms provide processes for US companies to comply with EU data protection principles and specifically EU directive 95/46/EC on the protection of personal data (referred to as personally identifiable information for US purposes). The US-EU and US-Swiss Safe Harbor programs enable US companies to register their certification with the US Department of Commerce under Safe Harbor Privacy Principles if they meet the requirements.

Therefore foreign transfers of personally identifiable information made to the PAN Group from the EU/Switzerland and made by it to the EU/Switzerland will be dealt with under and in accordance with the PAN Group's model contract and/ or certification under such Safe Harbor programs.

### **Links to other sites**

This 16pf.com Privacy Policy applies only to information collected by the PAN Group in respect of the 16pf.com website and activities related to the (i) 16pf instrument and (ii) Hilson and public safety related suite of products, and related goods and services, including 16pf and Hilson instrument qualified user qualification data. Links within our site to those of other organizations are not covered by this 16pf.com Privacy Policy so when you link to other websites you should read their own privacy policies. We do not accept any responsibility or liability for those policies. Please check those policies before you submit any personally identifiable information to those sites.

### **How you can contact us**

If you have any questions about this 16pf.com Privacy Policy or our privacy regime in respect of the business related to the (i) 16pf instrument and (ii) Hilson and public safety related suite of products, and related goods and services, or wish to opt out of direct marketing or you wish to update your personally identifiable information held by us related to such, please contact us as follows:

US and Canada: e-mail: [custserv@panpowered.com](mailto:custserv@panpowered.com) or telephone: 1-877-449-TEST  
UK, EU and rest of world: e-mail: [custservGlobal@panpowered.com](mailto:custservGlobal@panpowered.com) or telephone: +44-1865-304053.

The Institute for Personality and Ability Testing, Inc. and IPAT Holdings Limited are part of the PAN Group. If you wish to request any information about or copies of your personally identifiable information held by us or have a complaint regarding any matter under this 16pf.com Privacy Policy or how we handle data, you may contact our Privacy Officer, at the following address:

Privacy Officer  
Performance Assessment Network, Inc.  
11590 North Meridian Street  
Suite 200  
Carmel, IN 46032  
USA

### **How you can obtain data we hold about you**

If you wish to see a copy of the personally identifiable information that we hold about you, you can request this by writing to our Privacy Officer at the above address.

### **Governing law**

This 16pf.com Privacy Policy is governed by the laws of the State of Indiana, USA in respect of the PAN Group's US operations (including through Performance Assessment Network, Inc. and/or the Institute for Personality and Ability Testing, Inc.) and England and Wales in respect of the PAN Group's UK, EU and rest of world operations (including through IPAT Holdings Limited), and the place of performance of obligations will be Indiana, USA or England, as applicable.

### **Changes to this policy**

This 16pf.com Privacy Policy was produced in April 2016 and replaces any prior versions. The PAN Group reserves the right to modify or update this 16pf.com Privacy Policy from time to time without notice.

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