PRIVACY STATEMENT

Document	Privacy Statement
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Prepared by	Odin Company bv
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1. Who are we?

Odin Company bv ("Odin", "we") is the developer and provider of the psychometric assessment instrument ODC (Odin Development Compass) and the MatchConnector® platform. ODC maps a person's unconscious drives, talents and development potential. MatchConnector® is the platform that brings the depth of the ODC assessment to life: it provides coaches with in-depth insight into their coachees and gives organisations insight into the fit between a person and their context, based on roles, functions and vacancies defined using the same psychometric framework. Odin offers both products as a cloud-based service.

Our company details:

- Name: Odin Company bv
- Address: Jonkerbosplein 52, 6534 AB Nijmegen, the Netherlands
- Chamber of Commerce number: 57732590
- E-mail: privacy@odincompany.com

Odin has not appointed a Data Protection Officer (DPO). We have analysed whether appointment is mandatory under Article 37 GDPR. Our conclusion is that the core activities of Odin do not consist of large-scale systematic monitoring of data subjects as referred to in Article 37(1)(b) GDPR. For privacy enquiries, please contact us at privacy@odincompany.com.

This privacy statement explains how we process personal data of Data Subjects.

2. To whom does this privacy statement apply?

This privacy statement applies to:

- Data Subjects who complete an ODC and/or MC assessment;
- Professionals who use the Application on behalf of business clients (such as coaches, HR staff and consultants), to the extent that we process their personal data;
- Contact persons at (potential) Clients and Suppliers.

3. What personal data do we process?

Depending on your role and your use of our services, we process, inter alia, the following data:

3.1 Identification and contact details

We process the following identification and contact details:

- Name;

- Primary e-mail address: a personal (private) e-mail address with which the Data Subject creates an account. This address remains linked to the account, including after the relationship with the inviting organisation has ended;
- Business e-mail address (solely as an invitation address, temporarily);
- Telephone number (private, optional): used exclusively as a recovery method in the event of account recovery or loss of MFA access, and not as a standard authentication channel. The telephone number is not shared with the inviting organisation (Client);
- Organisation and job title (to the extent provided by the Data Subject or the inviting organisation).

3.2 Continuity of your account access

Odin uses a two-layer identity model to ensure that you can access your own ODC profile and reports at all times, including when you change employer or when the inviting organisation no longer administers your account.

When creating your account, you will be asked to provide a personal (private) e-mail address and/or private telephone number. This forms your personal access anchor. The business e-mail address with which you may have been invited is not used as the primary login identifier.

You may change your primary identifier and recovery method at any time via your account settings.

3.3 Assessment and reporting data (psychometric data)

- Responses to questions;
- Scores, profiles, charts and interpretive texts;
- Reports generated on the basis of the assessment.

3.4 Technical and usage data

- IP address, log data, date and time of login and testing;
- Browser and device type used;
- Actions within the Application (for example, creating or opening reports).

3.5 Communication data

- E-mails and messages via our systems;
- Support requests and feedback.

Psychometric test results and personality profiles constitute special categories of personal data within the meaning of the GDPR.

4. For what purposes and on what legal bases do we use your data?

4.1 Data Subjects

We use your data for:

- Conducting and scoring ODC and/or MC assessments;
- Generating reports and insights concerning your unconscious drives and behaviour;
- Guidance, coaching, career, team and leadership development, to the extent that these form part of the engagement;
- Displaying your ODC profile in a team overview and/or aggregating it into a team total (Team Dynamics Feature), exclusively where the client makes use of this feature and you have been informed thereof by the client. Odin does not form any judgement about your profile or your suitability for a team role in connection with this feature.

- Improving the quality and reliability of our instruments (preferably in aggregated or anonymised form). Quality improvement takes place exclusively on fully anonymised data.
- Registering a private telephone number as a recovery method, exclusively for account recovery in the event of loss of password or MFA access, and ensuring the continuity of your access to your ODC profile after the relationship with the inviting organisation has ended.

The legal bases for processing your psychometric data (special categories of personal data within the meaning of Article 9 GDPR) are:

- Your explicit consent pursuant to Article 9(2)(a) GDPR. You may withdraw this consent at any time without this affecting the lawfulness of processing carried out prior to withdrawal;
- In an employment law context (for example as an employee with your employer): a legal obligation or authorisation pursuant to Article 9(2)(b) GDPR in conjunction with Article 22(1) of the Dutch Implementation Act GDPR (UAVG) (processing necessary for the performance of obligations and the exercise of rights in the field of employment and social protection law), provided the conditions set out therein are satisfied.
- In a therapeutic or psychological counselling context, the processing of psychometric data also takes place on the basis of Article 9(2)(h) GDPR, namely processing by a qualified professional who is bound by a statutory duty of confidentiality. In that case, the professional concerned (your coach, psychologist or therapist) is responsible for the use of the instrument in that context.

The legal basis for processing your telephone number as a recovery method is the legitimate interest of Odin and yourself in ensuring the continuity of your access to your psychometric profile data (Article 6(1)(f) GDPR). For the use of your telephone number as an optional additional verification method, your consent constitutes the legal basis (Article 6(1)(a) GDPR). You may withdraw this consent at any time via your account settings.

For ordinary personal data (such as your name and e-mail address), the following additional bases apply:

- Performance of a contract (Article 6(1)(b) GDPR), for example where you are a direct client of Odin;
- The legitimate interest of the client (Article 6(1)(f) GDPR), provided that interest and your privacy rights have been carefully balanced. This applies exclusively to ordinary personal data — not to psychometric data.

4.2 Platform users and contact persons at clients (coaches, HR staff, consultants and other professionals)

We use your data for:

- Creating and managing user accounts;
- Providing access to the Cloud Service and Application(s);
- Client management, invoicing, contract management and support;
- Security, logging, monitoring and prevention of misuse;
- Improving and developing our services.

The legal bases are primarily: performance of the contract and our legitimate interest (for example, security and improvement of the service).

5. Who is responsible for your data?

Odin Company bv is in all cases an independent controller for the processing of personal data via the ODC platform. Where MatchConnector® is used, Odin and the organisation concerned

are joint controllers within the meaning of Article 26 GDPR. In that case, the respective responsibilities are set out in the Data Processing Appendix (Annex B to the User Agreement), which also serves as the joint processing arrangement referred to in Article 26 GDPR. The substance of this arrangement is available upon request via privacy@odincompany.com.

This means that Odin and the organisation concerned are each responsible for their own part of the processing, and that Data Subjects may exercise their rights with either party.

In all cases, we take appropriate measures to protect your data. We enter into data processing agreements within the meaning of Article 28 GDPR with our suppliers (sub-processors). With business clients, we set out the mutual GDPR responsibilities in the Data Processing Appendix.

6. With whom do we share your data?

We share personal data only to the extent necessary:

6.1 With the client of the assessment

- Please note: your private e-mail address and telephone number are not shared with the client (Customer). The client receives access only to the assessment results for which you have given consent. Your personal contact details remain exclusively with Odin at all times.
- This may be your employer, your coach or another organisation that has requested the assessment on your behalf. Where the client makes use of the Team Dynamics Feature, your ODC profile and the aggregated team data derived from it may become visible to other authorised users within the client's organisation. The client is responsible for informing team members about this use.
- This party is given access to your report(s) and relevant data, in accordance with the pre-agreed purpose and context.

6.2 With our service providers (sub-processors)

- For example, hosting providers, e-mail service providers, IT support, monitoring or security services.
- They process data exclusively on Odin's instructions and under strict obligations of confidentiality and security.

6.3 With other third parties

- Only where we are legally required to do so (for example, at the request of a supervisory authority or other competent authority), or with your explicit consent.

We do not sell your personal data to third parties.

7. Transfer outside the European Economic Area (EEA)

Odin processes all personal data exclusively on servers located within the EEA. Accordingly, there is no transfer of personal data to third countries within the meaning of Article 44 GDPR in respect of the processing carried out by Odin. This is documented in the EU-Processing Infrastructure Declaration (Annex E), a confidential document available upon written request via privacy@odincompany.com.

Where a sub-processor of Odin is established outside the EEA or processes data outside the EEA, Odin ensures that appropriate safeguards are in place in accordance with Chapter V GDPR, such as standard contractual clauses (SCCs) approved by the European Commission or an adequacy decision. A current overview of sub-processors and their locations is available upon request via privacy@odincompany.com.

8. Retention periods

We do not retain your personal data for longer than is necessary for the purposes for which it was collected, unless a longer retention period is legally required or permitted. In practice, this means, inter alia:

Category of data	Retention period	Legal basis
Private e-mail address (primary identifier)	For the duration of the active account; deleted upon request	Performance of contract
Telephone number (recovery method)	For the duration of the active account or until withdrawn by the user	Legitimate interest
Telephone number (optional MFA)	Until disabled by the user	Consent
ODC profiles and reporting data (all contexts)	For the duration of the active account; anonymised after 12 months of inactivity	Performance of contract and legitimate interest (quality assurance)
User accounts (active)	For the duration of the active account	Performance of contract
User accounts (inactive)	6 months after deactivation	Administration
MatchConnector® matching results (Context B — joint processing)	Depending on application: max. 3 years after end of employment for L&D/Career; max. 1 year after completion of selection procedure for Recruitment, unless the Data Subject has given explicit consent for a longer period, or such shorter period as instructed by the Client	Legitimate interest / legal obligation (depending on application)
Incomplete registrations	3 months after invitation	Legitimate interest
Log files	12 months	Security / legitimate interest
Invoice and contract data (incl. User Agreement and appendices)	7 years	Legal obligation (s. 52 Dutch General Tax Act)
AI-generated texts (vacancy texts, interview questions, training recommendations, L&D explanations, career planning proposals, etc.)	For the duration of the link between the Data Subject and the client's Hub; deleted upon termination of the link or earlier upon request of the Data Subject	Consent + performance of contract

Additional specific retention periods may be specified in the agreement with our clients or in supplementary documentation.

9. Security of your data

We take appropriate technical and organisational measures to protect your personal data against loss or unlawful use, including:

- Encryption of data at rest and in transit;

- Multi-factor authentication (MFA) via a TOTP authenticator app, mandatory for all user accounts;
- Access to the platform requires a personal invitation link and e-mail verification upon account creation;
- Role-based authorisations, ensuring that only authorised persons have access;
- Logging and monitoring of access and use;
- Regular back-ups and procedures for recovery in the event of incidents.

Notwithstanding the security measures taken, a data breach can never be entirely excluded. Should a data breach occur that is likely to result in a risk to your rights and freedoms, we will notify the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) within 72 hours in accordance with Article 33 GDPR. Should a data breach be likely to result in a high risk to your personal privacy, we will notify you without undue delay in accordance with Article 34 GDPR, unless:

- We have implemented appropriate technical and organisational protective measures (such as encryption);
- We have subsequently taken measures that make it unlikely that the high risk to your rights and freedoms will materialise;
- Notification would require disproportionate effort.

In the event of a data breach that also affects the processing of the organisation involved (joint controller), we will inform that organisation without undue delay in accordance with the arrangements in the Data Processing Appendix, so that it may also fulfil its own notification obligations to the Dutch Data Protection Authority and to Data Subjects.

No system can guarantee absolute security, but we strive for a level of security commensurate with the nature and sensitivity of the data processed.

10. Automated processing

When using ODC and MatchConnector®, an automated comparison is made in which your psychometric profile is set against a Reference Framework. This produces a Matching Result that is offered as a supporting tool to the client. The final decision (such as a selection or placement decision) is made by a human being. Odin itself does not make automated decisions with legal effect within the meaning of Article 22 GDPR.

Where the client (your employer or recruiting organisation) uses the Matching Result to make decisions that directly affect you, that party is responsible for compliance with Article 22 GDPR, including the right to human intervention, the right to express your point of view and the right to an explanation of the decision. You may contact the organisation concerned in this regard.

10.1 Use of artificial intelligence (AI)

Odin uses AI systems to support the provision of services. These AI systems are deployed to generate descriptive, summary or explanatory texts based on your ODC profile and contextual information provided by the client. Examples of AI applications include (non-exhaustively): vacancy texts, interview questions tailored to your profile, training recommendations, explanations of your L&D plan and career planning proposals. The range of AI applications may be expanded in the future.

The AI-generated texts are stored in MatchConnector® and are accessible to the organisation that requested the assessment on your behalf (your client), and to yourself to the extent that access has been granted. The texts are attributable to you and are regarded as personal data within the meaning of the GDPR.

The AI has no influence on the psychometric assessment itself or on the calculation of your ODC profile, Connectors or Matching Result. Your personal profile is never the product of AI.

You will be asked for consent to the use of your ODC profile as input for AI text generation. This consent is overarching: it applies to all current and future AI applications based on your ODC profile, for the purposes of your guidance. You may withdraw this consent at any time via your account settings or via privacy@odincompany.com.

You have the right to access, rectify and erase the AI-generated texts stored about you. You may direct such a request to privacy@odincompany.com. The AI-generated texts will be deleted once the link between you and the organisation that requested the assessment is terminated — unless that organisation has an independent legal basis for retaining the texts.

10.2 Use of Google API services

Odin Company uses services provided by Google LLC ("Google"), including Google authentication (signing in via a Google account). In connection with this use, personal data may be obtained via Google APIs, such as your name and e-mail address.

Our handling of data obtained via Google APIs complies with the Google API Services User Data Policy, including the Limited Use requirements. This means, inter alia, that:

- Data obtained via Google APIs is used exclusively for the purposes that are visible and prominent in our application, and not for other purposes such as displaying advertisements or selling data to third parties;
- We do not transfer data obtained via Google APIs to third parties, unless this is necessary to provide or improve the service to you, for security purposes, to comply with applicable laws and regulations, or in the context of a merger, acquisition or sale of assets — and then only with your explicit prior consent;
- We do not permit employees or third parties to access data obtained via Google APIs unless this is necessary for security purposes, to comply with applicable laws and regulations, or after you have given explicit consent to this;
- We secure data obtained via Google APIs in accordance with the security measures described in this privacy statement.

The specific Google API services we use and the data processed thereby depend on the functionalities you use within our application. Current information on this is available upon request via privacy@odincompany.com.

11. Your rights

Under the GDPR, you have, subject to certain conditions, the following rights:

- Right of access to your personal data;
- Right to rectification (correction) of inaccurate or incomplete data;
- Right to erasure ("right to be forgotten");
- Right to restriction of processing;
- Right to data portability;
- Right to object to certain processing operations (for example, where based on legitimate interest);
- Right to withdraw consent given, without this affecting the lawfulness of processing carried out prior to withdrawal.

You may exercise your rights with both Odin and the organisation that requested the assessment on your behalf (for example, your employer or coach). Each party is obliged to respond for the part of the processing for which it acts as controller. You may direct your request to Odin via privacy@odincompany.com or to the organisation concerned via its own contact details.

If you have a complaint regarding processing by the organisation that requested the assessment on your behalf (your employer, coach or recruiting organisation), you may contact that

organisation via its own contact details. That organisation, as an independent controller, is obliged to handle your complaint in respect of its own processing operations. Odin is not liable for processing carried out by the client.

12. Questions, complaints and the Data Protection Authority

If you have questions or complaints regarding the processing of your personal data, you may contact us via:

- E-mail: privacy@odincompany.com
- Post: Odin Company bv, Attn: Privacy, Jonkerbosplein 52, 6534 AB Nijmegen, the Netherlands

If you believe that we are processing your personal data in breach of the GDPR, you have the right to lodge a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) at www.autoriteitpersoonsgegevens.nl.

13. Changes to this privacy statement

We may amend this privacy statement from time to time, for example in connection with changes to our services or to applicable laws and regulations. The most recent version is always available on our website or will be made available via the Application. We recommend that you consult this statement regularly.

Where an amendment relates to the legal bases or purposes of the processing of psychometric data (special categories of personal data within the meaning of Article 9 GDPR), we will actively inform you in advance of its entry into force and, to the extent required, seek your explicit consent again. Continued use of our services after such a change does not constitute consent to new processing purposes.