

PRIVACY STATEMENT

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1. Who are we?

Odin Company bv ("Odin", "we") is the developer and provider of the psychometric measurement 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 measurement to life: it offers coaches in-depth insight into their coachee and gives organisations insight into the fit between individual and context, on the basis of roles, functions and vacancies defined using the same psychometrics. Odin offers both products as a Cloud Service.

Our company details:

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

Odin has appointed a Data Protection Officer (DPO). Because Odin's core activity involves the large-scale processing of special categories of personal data (psychometric data), this processing falls under Article 37(1)(c) GDPR. The DPO independently monitors compliance with the GDPR within Odin, advises on data protection impact assessments and is the central point of contact for Data Subjects and for the Dutch Data Protection Authority (Autoriteit Persoonsgegevens). You can reach the DPO via fg@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 measurement;
- Professionals who use the Application on behalf of business clients (such as coaches, HR staff and consultants), in so far as we process their personal data;
- Contact persons at (prospective) Clients and Suppliers.

3. Which personal data do we process?

Depending on your role and your use of our services, we process, among other things, the following data:

3.1 Identification and contact details

We process the following identification and contact details:

- Name;
- Primary email address: a personal (private) email address with which the Data Subject creates an account. This address remains linked to the account, even after the end of the relationship with the inviting organisation;
- Business email address (solely as an invitation address, temporarily);
- Telephone number (private, optional): used solely as a recovery method for 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 (in so far as provided by the Data Subject or the inviting organisation).

3.2 Continuity of your account access

Odin applies a two-layer identity model to ensure that you retain access to your own ODC profile and reports at all times, even if you change employer or the inviting organisation no longer manages your account.

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

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

3.3 Test and report data (psychometric data)

- Answers to questions;
- Scores, profiles, charts and interpretation texts;
- Reports generated on the basis of the measurement.

3.4 Technical and usage data

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

3.5 Communication data

- Emails and messages via our systems;
- Support requests and feedback.

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

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

4.1 Data Subjects

We use your data for:

- The administration and scoring of ODC measurements;
- The generation of reports and insights into your unconscious Drives and talents;

- Guidance, coaching, career, team and leadership development, in so far as part of the programme;
- Display of your ODC profile in a team overview and/or aggregation into a team total (Team Dynamics Feature), solely if the commissioning organisation makes use of this and you have been informed thereof by the commissioning organisation. In this feature, Odin does not form any judgement about your profile or your role in a team.
- Improvement of the quality and reliability of our instruments (preferably in aggregated or anonymised form). The quality improvement takes place solely on fully anonymised data.
- Registering a private telephone number as a recovery method, solely for account recovery in the event of loss of your password or MFA access, and safeguarding the continuity of your access to your ODC profile even after the end of the relationship with the inviting organisation.

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

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

For the processing of your telephone number as a recovery method, the legal basis is the legitimate interest of Odin and yourself in 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 is the legal basis (Article 6(1)(a) GDPR). You can withdraw this consent at any time via your account settings.

For ordinary personal data (such as your name and email address), the following additionally applies:

- The performance of a contract (Article 6(1)(b) GDPR), for example if you are a direct client of Odin;
- The legitimate interest of the commissioning organisation (Article 6(1)(f) GDPR), provided that this interest and your privacy rights have been carefully weighed. This applies solely 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;
- Granting access to the Cloud Service and Application(s);
- Client management, invoicing, contract management and support;
- Security, logging, monitoring and abuse prevention;

- Improvement and development of our services.

The legal bases are in particular: the performance of the contract and our legitimate interest (for example the security and improvement of the services).

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, the organisation concerned is — depending on the manner in which MatchConnector® is deployed — either an independent controller for its own use of your results, or, where that organisation draws up a Reference Framework, together with Odin a joint controller as referred to in Article 26 GDPR. In both cases, the mutual responsibilities are laid down in the GDPR Annex (Annex B to the User Agreement), which, in the case of joint controllership, also serves as the joint processing arrangement as referred to in Article 26 GDPR. The essence thereof is available on 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 can exercise their rights with either party.

In all cases, we take appropriate measures to protect your data. With our suppliers (sub-processors) we conclude processor agreements as referred to in Article 28 GDPR. With business clients, we lay down the mutual GDPR responsibilities in the GDPR Annex.

6. With whom do we share your data?

We share personal data solely in so far as necessary:

6.1 With the commissioning organisation of the measurement

- Please note: your private email address and telephone number are not shared with the commissioning organisation (Client). The commissioning organisation receives access solely to the measurement results for which you have given consent. Your personal contact details remain solely with Odin at all times.
- This may be your employer, your coach or another organisation that requested the measurement for you. If the commissioning organisation 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 organisation of the commissioning organisation. The commissioning organisation is responsible for informing team members about this use.
- This party is granted access to your report(s) and relevant data, in accordance with the previously agreed purpose and context.

6.2 With our service providers (sub-processors)

- For example hosting providers, email service providers, IT support, monitoring or security services.
- They process personal data solely on the instructions of Odin and under strict confidentiality and security obligations.

6.3 With other third parties

- Only where we are legally obliged 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. Transfers outside the European Economic Area (EEA)

Odin processes all personal data solely on servers located within the EEA. There is therefore no transfer of personal data to third countries as referred to in Article 44 GDPR in so far as the processing operations by Odin are concerned. This is documented in the Infrastructure Declaration EU processing (Annex E), a confidential document that is made available on written request via privacy@odincompany.com.

If a sub-processor of Odin is established outside the EEA or processes personal data outside the EEA, Odin ensures appropriate safeguards 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 can be requested via privacy@odincompany.com.

8. Retention periods

We do not retain your personal data for longer than is necessary for the purposes for which they were obtained, unless a longer retention period is required or permitted by law. In practice, this means, among other things:

Data category	Retention period	Legal basis
Private email address (primary identifier)	For as long as the account is active; deleted on request	Performance of the contract
Telephone number (recovery method)	For as long as the account is active or until withdrawal by the user	Legitimate interest
Telephone number (optional MFA)	Until disabled by the user	Consent
ODC profiles and report data (all contexts)	For as long as the account is active; anonymised after 12 months of inactivity	Performance of the contract and legitimate interest (quality assurance)
User accounts (active)	For as long as the account is active	Performance of the contract
User accounts (inactive)	6 months after deactivation	Administration
MatchConnector® matching results (Context B — joint processing)	Depending on the application: max. 3 years after the end of employment for L&D/Career; max. 1 year after completion of the selection procedure for Recruitment (envisaged — not yet operational), unless the Data Subject has expressly given consent for a longer period, or as much shorter as the Client instructs	Legitimate interest / legal obligation (depending on the application)
Incomplete registrations	3 months after invitation	Legitimate interest
Log files	12 months	Security / legitimate interest

Invoice and contract data (incl. User Agreement and annexes)	7 years	Legal obligation (Article 52 AWR)
AI-generated texts (vacancy texts, interview questions, training recommendations, L&D explanations, career planning proposals, etc.)	For as long as the link between the Data Subject and the commissioning organisation's Hub is active; deleted upon termination of the link or earlier at the request of the Data Subject	Consent + performance of the contract

Further specific retention periods may be specified in the agreement with our clients or in additional 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 email verification upon account creation;
- Role-based authorisations, so 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.

Despite the security measures taken, a personal data breach can never be entirely ruled out. If a personal data breach occurs that is likely to result in a risk to your rights and freedoms, we will report this to the Dutch Data Protection Authority within 72 hours in accordance with Article 33 GDPR. If a personal data breach is likely to result in a high risk to your privacy, we will notify you thereof without delay in accordance with Article 34 GDPR, unless:

- We have taken appropriate technical and organisational protection measures (such as encryption);
- We have subsequently taken measures as a result of which the high risk to your rights and freedoms is likely no longer to materialise;
- The notification would involve disproportionate effort.

In the event of a personal data breach that also affects the processing operations of the organisation concerned (joint controller), we will inform that organisation without delay in accordance with the arrangements in the GDPR Annex, so that it too can comply with its own notification obligation towards the Dutch Data Protection Authority and Data Subjects.

No system can guarantee absolute security, but we strive for a level of security appropriate to 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 to the commissioning organisation as a supporting instrument. The final decision

(such as a selection or placement decision) is taken by a human. Odin itself does not take automated decisions with legal effect as referred to in Article 22 GDPR.

If the commissioning organisation (your employer or recruiting organisation) uses the Matching Result for 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 can contact the organisation concerned about this.

10.1 Use of artificial intelligence (AI)

Odin makes use of AI systems to support its services. These AI systems are deployed to generate descriptive, summarising or explanatory texts on the basis of your ODC profile and context information supplied by the commissioning organisation. Examples of AI applications are (non-exhaustive): 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 within the same purpose.

The AI-generated texts are stored in MatchConnector® and are accessible to the organisation that requested the measurement for you, and to yourself in so far as access has been granted. The texts are traceable to you and are regarded as personal data within the meaning of the GDPR.

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

You are asked for consent for the use of your ODC profile as input for AI text generation. This consent is specific to the AI applications referred to above on the basis of your ODC profile, for the purpose of your guidance. In the case of an AI application with a materially different purpose or a different legal basis, we will ask you again separately for consent. You can withdraw this consent at any time via your account settings or via privacy@odincompany.com.

You have the right to access, rectification and erasure of the AI-generated texts stored about you. You may address this request to privacy@odincompany.com. The AI-generated texts are deleted as soon as the link between you and the organisation that requested the measurement is terminated — unless that organisation has an independent legal basis for retaining the texts.

10.2 Use of Google API services

Odin Company makes use of services of Google LLC ("Google"), including Google authentication (signing in via a Google account). In the context of this use, personal data may be obtained via Google APIs, such as your name and email 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, among other things, that:

- Data obtained via Google APIs are used solely 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 for providing or improving the services 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 solely with your explicit prior consent;
- We do not permit any employees or third parties to view data obtained via Google APIs, unless this is necessary for security purposes, to comply with applicable laws or regulations, or after you have given explicit consent thereto;
- We secure the data obtained via Google APIs in accordance with the security measures described in this privacy statement.

Which Google API services we specifically deploy, and which data are processed thereby, depends on the functionalities you use within our application. Current information on this can be requested via privacy@odincompany.com.

11. Your rights

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

- The right of access to your personal data;
- The right to rectification (correction) of inaccurate or incomplete personal data;
- The right to erasure (the 'right to be forgotten');
- The right to restriction of the processing;
- The right to data portability;
- The right to object to certain processing operations (for example in the case of a legitimate interest);
- The right to withdraw consent given, without this affecting the lawfulness of the processing before the withdrawal.

You can exercise your rights with both Odin and the organisation that requested the measurement for you (for example your employer or coach). Each of the two parties is obliged to respond to this for the part for which it is a controller. You can address your request to Odin via privacy@odincompany.com or to the organisation concerned via its own contact details.

If you have a complaint about the processing by the organisation that requested the measurement for you (your employer, coach or recruiting organisation), you can contact that organisation via its own contact details. That organisation, as an independent controller, is obliged to handle your complaint for its own processing operations. Odin is not liable for processing by the commissioning organisation.

12. Minors

The ODC measurement and the Junior ODC measurement may be used by minors, for example in an educational or guidance context. Because an ODC profile concerns special categories of personal data, additional safeguards apply. For a minor under the age of 16, we process personal data solely with the explicit consent of a parent or legal representative (guardian). A minor aged 16 or older can give explicit consent themselves; the young person and — for young persons under 16 — their parent or guardian can withdraw that consent at any time.

The minor retains the right of access to their own profile at all times and retains full control over it, including after reaching the age of majority. We tailor the provision of information to the age and level of understanding of the young person.

13. Questions, complaints and the Dutch Data Protection Authority

For questions or complaints about the processing of your personal data, you can contact us via:

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

If you consider 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 (www.autoriteitpersoonsgegevens.nl).

14. 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 laws and regulations. The most recent version can always be found on our website or is made available via the Application. We recommend that you consult this statement regularly.

If an amendment relates to the legal bases or purposes of the processing of psychometric data (special categories of personal data as referred to in Article 9 GDPR), we will actively inform you prior to the entry into force and, in so far as required, ask again for your explicit consent. Continued use of our services after such an amendment does not count as consent for new processing purposes.