

## Leeuwendaal privacy statement regarding CliftonStrengths

### About us

Leeuwendaal is a comprehensive HR consultancy firm for the public sector. We offer services in e.g. the field of assessments, talent and team development, coaching and training. Leeuwendaal is ISO 9001 and ISO 27001 certified.

Leeuwendaal and Gallup have entered into a partnership to implement CliftonStrengths in the Netherlands. CliftonStrengths is a renowned tool that helps people to identify, develop and appreciate their strengths. This approach assumes that strengthening your strengths is far more beneficial than remedying your weaknesses. Organizations taking a strengths-based approach have proven to be significantly more successful.

### CliftonStrengths

You are about to fill out the CliftonStrengths questionnaire. This tool offers insight into your strengths profile, with the talent themes in your unique order. CliftonStrengths also offers tried-and-tested strengths-based strategies for further development.

After you have completed the questionnaire, you will receive your personal reports, development strategies and materials for inspiration.

### Personal data

To facilitate CliftonStrengths, we record the following personal data:

Personal data	Purpose	Legal basis for data processing*
Name, address and email	Inviting for participation and creating account	Legitimate interest
Completed questionnaire	Generation of the CliftonStrengths report	Explicit consent

*\*By legitimate interest we mean that these personal data are needed to process the CliftonStrengths questionnaire. For special categories of personal data we need your explicit consent to use the data.*

### Who has access to your data

- ▶ **Leeuwendaal:** your data can only be accessed by the Leeuwendaal coaches, trainers and supporting staff who are directly involved in the performance of the assignment. They do not have access to the individual answers to the questions, but they can access the final result: your talent themes, in your unique order.
- ▶ **Gallup:** as the supplier of the questionnaire and processor of the data, Gallup can access your data. We have concluded a Data Processing Agreement with Gallup containing, among others, agreements about security and storage policy. Leeuwendaal remains responsible at all times for the processing of your data in CliftonStrengths. Gallup is an international research and consultancy firm that has its headquarters in the USA.

*And depending on the kind of assignment Leeuwendaal is performing for a client:*

- ▶ **Client of Leeuwendaal:** if the client has requested that the CliftonStrengths results be used at a team or organization level (e.g. team development, group analysis and team coaching), we will share your results with people from your organization for whom they are relevant (for example HR, your supervisor, your team).

If you have any objections you can stop this sharing of information with others at all times. Your own individual results will remain available to you. To stop the sharing process contact us at [gallupinfo@leeuwendaal.nl](mailto:gallupinfo@leeuwendaal.nl).

If you filled out CliftonStrengths exclusively for individual purposes (e.g. coaching or an assessment), your results will not be shared with the client.

- ▶ **Participants in training courses:** Leeuwendaal is Gallup's partner in the organization of Gallup training courses for working with CliftonStrengths in the Netherlands. If the results of CliftonStrengths are used in these training courses, we will request your permission to share the results with the other participants in the course before the course begins. Using the results is an essential part of the training courses.

### **Security**

Security, to us, has two sides: technology and behaviour.

- ▶ **Technology:** the CliftonStrengths questionnaire is filled out in Gallup's portal. Access to this portal is strictly secured according to the latest technological standards and based on the principles of privacy by design. Gallup is ISO 27001 certified.
- ▶ **Behaviour:** Leeuwendaal and Gallup devote considerable attention to employee awareness with regard to personal data protection in the workplace. All staff are trained every year in the do's and don'ts of this subject.

### **Retention period**

CliftonStrengths is meant to serve as a personal development tool. Based on our vision that you continue learning and developing and that your talent themes can boost this, your data will remain available until you actively ask us to remove them. This you can request at any time.

### **Data transfer to USA**

Your data are processed on Gallup's servers in the USA. Due to the invalidation of the Privacy Shield by the European Court, we are going to ask you to explicitly give your consent (Article 49 GDPR) for data processing in the USA. The Privacy Shield was meant to guarantee the protection of personal data on a similar level as the GDPR. The main reason for the invalidation was the scope of authority of the American intelligence services.

We would like to emphasize that Gallup has taken supplementary measures to protect your data, using encryption (128-bit or greater) in transit and at rest.

Finally we would like to point out that a given consent can always be withdrawn. In that case we erase your data.

### **Right of access to, rectification or erasure of personal data**

As a participant, you are in control of your own data at all times. This means that at any time, you can ask Leeuwendaal to allow you to inspect your personal data, or to remove them entirely. You can also ask us to correct factual errors. Leeuwendaal will then instruct Gallup to process your request.

### **Freely given consent**

In this document, we have explained how Leeuwendaal handles your personal data when you participate in CliftonStrengths. We wish to emphasize that your participation in CliftonStrengths is entirely voluntary.

### **Any questions?**

In case of any questions or doubts, please contact the Gallup project coordinators at Leeuwendaal by calling (+31)88 00 86 800 or by sending a message to [gallupinfo@leeuwendaal.nl](mailto:gallupinfo@leeuwendaal.nl). We expect that they will be able to answer most questions directly. If they cannot answer your question, they will refer you to our Data Protection Officer, Mark Thorborg LLM. You can reach him through our general telephone

number, (+31)88 00 868 00 or at [privacy@leeuwendaal.nl](mailto:privacy@leeuwendaal.nl). You also always have the right to submit a complaint to the Dutch Data Protection Authority.

**Consent for data processing**

By clicking the 'I agree' button you give Leeuwendaal your consent to process your personal data for executing the CliftonStrengths questionnaire. You also give your consent for processing your data in the USA. If you do not give your consent, you indicate that you don't want your data to be shared with Leeuwendaal or processed in the USA. This means participation in the CliftonStrengths questionnaire is impossible.

In that case, please contact us, so we can discuss further actions. Please call our Gallup project coordinator at Leeuwendaal (088 00 868 00).