

Your Arctic Shores Privacy Notice

Last updated 22 March 2024

Who we are: Hello! We are Arctic Shores Limited. For the purposes of the UK GDPR, where you are a **Candidate**, we are a Data Processor.

If you are a **User, Website Visitor** or **Prospective Client** we will process your personal data in our capacity as a Data Controller.

What we do: We are on a mission to provide next generation task-based assessment tools for companies.

Why is privacy notice relevant to you: You are here because we may process some of your personal information either because:

- You have been invited by one of the companies we work with to undertake a task-based assessment (we will refer to you as a **"Candidate"** in this privacy notice), or
- You are a business partner who uses our UNA or Data Hub platform on behalf of the company to set up, manage and administer the task-based assessments for that company (and we will refer to you as a **"User"** in this privacy notice).
- You are visiting our website (and we will refer to you as a **"Website Visitor"** in this privacy notice)
- You have attended one of our events or contacted us to collaborate with us in some way (we will refer to you as an **"Prospective Client"**)

Please take the time to read this privacy notice together with the privacy notice of the company that introduced you to us.

How to contact us: *We're here to help!*

Questions regarding this privacy notice and how we may process your data are welcomed and should be addressed to privacy@arcticshores.com or by mail to:

Arctic Shores Limited
Attn: Data Protection Queries
17 Marble Street
Manchester, M2 3AW
England

Regarding Your Queries:

If you are a **Candidate**, please be aware that we are a Data Processor. This means that we process your personal data solely on behalf of the business that introduced you to us, as they are the Data Controller, so we may refer your query to them. The Data Controller is responsible for deciding how your information is used and we process it based on their instructions. If we need to pass your query to them, we'll let you know. Rest assured, we'll also work together with them, you, and the regulator to ensure you receive the necessary information and support.

Personal Information We Collect about You

If you are a Candidate: We always collect:

- Psychometric Data: This is the responses you input during the assessment process.
- Technical Data: Your IP (internet protocol) address used to connect your computer to the internet, device identifier, browser type and version, time zone setting, browser plug in types and versions, operating system and platform.

We will may also collect:

- Identity and Email Address Data: Your first name, last name, candidate ID, username and email address.
- Contact Data: your telephone number or address - if you contact us for any reason and would like us to contact you back.
- Interaction Data: Any emails or letters you might write to us or support tickets (if you raise a technical support query).
- Demographic data: such as your ethnicity, age, gender, health and socioeconomic background - but only if you wish to provide this to us after you have used our assessment tools. This is always completely optional.
- Special category data, such as health information, which will be collected if you request a reasonable adjustment for the assessment.

If you are a User: We collect:

- Identity Data: Your first name, last name.
- Contact Data: Your email address and phone number.
- Interaction Data: The data you provide when you are logged-into and use our UNA or DataHub Platform and in

any emails or other correspondence (such as tech support tickets).

- Technical Data: Your IP (internet protocol) address.

If you are a Prospective Client:

We collect:

- Identity Data: Your first name, last name and company you work for.
- Contact Data: Your email address and phone number.

If you are a Website Visitor:

We collect:

- Technical Data: Your IP (internet protocol) address
- Information about how you are using our website (please see Cookies section below).

How We Get Your Personal Information

We will normally receive your personal data directly from you and any devices you use when accessing our website or using our platform.

If you are a **Candidate** we may receive your name and E-Mail address directly from the company who introduced you to us.

Our Legal Basis to Use Your Personal Information:

Under the UK General Data Protection Regulation, the lawful basis we rely on for processing your personal information is contractual necessity. This means that we use your data to deliver our service under contracts we have in place with **Users** of our platforms, and who introduced **Candidates** to us.

In very limited circumstances we may also process your personal information to comply with a legal or regulatory obligation or for our legitimate interests. We will describe some examples for situations when this may occur below.

Where you may be sharing special category data with us (for example health information), this will be on the basis of consent. It is the responsibility of the company who introduced you to us (the Data Controller,) to ensure that they are obtaining your explicit consent for us to process this data.

For further information, we encourage you to also read the privacy notice of the company that introduced you to us or to reach out to them directly.

What We Do With Your Personal Information:

If you are a Candidate:

We use your personal information in the following ways to perform our contract with the business that introduced you to us:

- Provide a task-based assessment to you on the instructions of the company that introduced you to us.
- Using a standardised scoring mechanism, your assessment results will be compared against appropriate norm groups to assess your responses against the characteristics required by the company introducing you, as part of their job profile.
- Report the results of that assessment to the Company. Once generated, your results are automatically sent to the company who introduced you to us.
- Provide you with your own summary of your assessment results. This report will provide you with a summary of your assessments results and how you scored against the criteria set by the company. These results are based on a standardised marking system and feedback framework.
- Manage any support queries you may raise (such as technical issues you may be having), including queries about your personal data.

If you provide us with any optional demographic data either:

- When we ask you before you start your assessment whether you have any disabilities (such learning difficulties), we will provide that personal information to the company who introduced you so it can decide whether it wishes to make any adjustments to the assessment based on the information you provide.
- When we ask you after you have completed the task-based assessment for information about your ethnicity, health, socio-economic background, disabilities and education, we use that personal information for equal opportunity monitoring and reporting. While the company that introduced you may receive a summary report containing aggregated data we receive from these responses, the data is anonymised and they will not receive your specific responses to those questions.

We may also use your Personal Data:

- To improve our product or the services we provide. However, if we do this, we will anonymise your personal information first (meaning that any data we use will not be able to identify you).
- On the rare occasion:

- for our legitimate interests of investigating or preventing fraudulent, harmful, unauthorised or illegal activity on our platform.
- to comply with any legal requirement such as being required by a court or regulatory body such as the Information Commissioner's Officer to process your personal information in a specific way.

If you are a User:

We use your personal information to perform our contract with the business that introduced you to us. This includes to:

- Provide the services set out in our contract with the business that introduced you to us and to administer that contract (such as processing orders, payment of invoices and ongoing relationship management).
- Provide any reports and insights to you.
- Process any support tickets (such as technical support or service level issues).
- Improve our product or the services we provide.

We may also use your Personal Data:

- for our legitimate interests of investigating or preventing fraudulent, harmful, unauthorised or illegal activity on our platform.
- for our legitimate interests of sending you marketing communications related to our product or services (and you will always have an opportunity to opt out of this).
- to comply with any legal requirement such as being required by a court or regulatory body such as the Information Commissioner's Officer to process your personal information in a specific way.

If you are a Prospective Customer:

We will use your Personal Data to keep you informed of our products and services we feel may be of interest to you. We will do so on the basis of legitimate interest unless consent is required, in which case it will be obtained as appropriate beforehand.

Who We Share Your Personal Information With:

We will share your personal information with the company who introduced you to us in accordance with this Privacy Notice because they are the data controller of your personal information and we process your personal information for them.

In order to provide our services to the company who introduced you to us, we also share your personal information with other third party data sub-processors. You can find out who these sub-processors are available on request.

International Data Transfers

When we share personal information, it may be transferred to, and processed in, countries other than the country you live in – such as to the United States, where our customer management software is located. These countries may have laws different to what you're used to - but rest assured, where we disclose personal data to a third party in another country, we put safeguards in place to ensure your personal data remains protected.

Where your personal data is transferred outside the United Kingdom or the European Economic Area, it will only be transferred to countries that have been identified as providing adequate protection (like New Zealand), or to a third party where we have approved transfer mechanisms in place to protect your personal data, for example, by entering into an International Data Transfer Agreement. For further information, please contact us using the details set out in the Contact us section below.

How Long We Hold Your Personal Information For:

If you are a Candidate, we will retain your information for 12 months after your last activity with us. This period is counted from the latest of these events: (i) when a record of you is created in our Platform by the company that introduced you to us, (ii) when you receive an invitation to take the assessment, (iii) when you open the assessment, or (iv) when you complete the assessment. If the company that introduced you to us asks you to take another assessment within this 12 months period (perhaps because you have applied for another role at that company), this retention period starts again.

If you are a User, we will retain your information for the duration of the Agreement and for a reasonable period after that to either return your personal data to the company or delete Your Personal Data.

We may erase your personal information sooner than that if the company who introduced you to us asks us to do that - either on their own behalf or following a request from you to erase your personal information. If you want to exercise those rights, you

need to contact the company that introduced you to us. You can find the relevant contact details in their privacy notice.

Special Category Data: Special category data includes information about criminal convictions, race or ethnic origin, political or religious beliefs, health, genetic or biometric data, sex life and sexual orientation, trade union membership and philosophical beliefs of an individual.

We will not routinely collect special category data. However, if you request a Reasonable Adjustment to complete the Candidate Assessment, or if you choose to participate in our post-assessment candidate survey, we may collect data about your health and ethnic origin. This is always completely optional and will not be shared with the company that introduced you to us.

If you provide us with health information prior to taking the assessment, we will share this information with the company that introduced you, so they can determine whether any reasonable adjustments need to be made to the assessment before you take it.

How Do We Keep Your Personal Information Secure:

Safe and sound, that's our promise!

We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. The efficacy of these security measures is evidenced by the fact that we are proudly ISO 27001 certified. This is a global standard for keeping personal information safe and secure. We also apply the technical and organisational measures across our company to prevent unauthorised processing of your personal information or loss, damage or destruction to it. All our employees are also subject to a contractual duty of confidentiality and training, along with other protective measures.

We require our sub-processors to protect your personal data as we do in this notice, and they may not use your personal information for any other purpose.

We have also put in place procedures to deal with any actual or suspected personal data breach. In the event of any such breach, we have systems in place to work with the company who introduced you to us and the applicable regulators.

Your Rights:

You're in control

The GDPR gives you certain rights regarding the processing of your personal information. The rights that may apply will depend on the purpose for which your data is being processed. The company which introduced you to us (who is the Data Controller) will be able to provide you with full details of your applicable rights. You should refer to their Privacy Notice, or contact them directly. These rights may include the following:

Your right of access. You have the right to ask us for copies of your personal information.

The right to be informed. You have the right to be told what personal data is collected about you, why, who is collecting the data, how long it will be held, how you can file a complaint and with whom your data will be shared.

Your right to rectification. You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure. You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing. You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing. You have the right to object to the processing of your personal information in certain circumstances.

Your right to data portability. You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

Rights in relation to automated decision making and profiling. You have particular rights in relation to automated decision making and profiling to reduce the risk that a potentially damaging decision is taken without human intervention. You can object to your personal data being used for profiling, direct marketing or research purposes.

You will usually not be charged for exercising any of these rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive, or, we may simply refuse to comply with your request in these circumstances.

We or the company that introduced you to us will try to respond to all requests within one month. Should we require more time, we will let you know within 30 days of your request and will always respond within 90 days of the date of your request.

To exercise any of these rights, we recommend that you contact the company that introduced you to us - as they are responsible for determining the scope of these rights and how they are administered. You can also contact us by using the contact details at the start of this notice and we will pass your request on to that company if you would prefer to do that.

Changes to this notice

We regularly review our privacy notice and we will post any modifications or changes to this privacy notice on this page, unless we specifically notify you otherwise.

Need to Complain? *Let's sort it out.*

If you're concerned about how we handle your data, please reach out to us using the contact details we provided in this notice or contact the company that introduced you to us.

Not satisfied? You can also contact the ICO:

Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline: 0303 123 1113

Website: <https://www.ico.org.uk>

How We Use Cookies and Similar Technologies:

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. The table below explains the cookies we use and why.

You can set your browser to refuse all or some of those cookies but if you disable or refuse these cookies, some parts of this assessment may become inaccessible or not function properly.

Cookie ID	Purpose and User Type	Expiry
token	This cookie is for Candidates and UNA Users and is a strictly necessary cookie. This is a token session cookie. Whenever you complete an action, this	30 minutes

	cookie tells our system that so it can remember what page you are currently on.	
Apt.uid Apt.sid (for Candidates) A random uid is generated (for Una Users)	This cookie is for Candidates and UNA Users and is an optional cookie. This is a unique id used to track what you are doing (such as what you are clicking on). The purpose is to track usage of the software so our product team can improve the product and user experience	30 minutes
amplify-signin-with-hostedUI	This cookie is for UNA Users and is a strictly necessary cookie. This is an AWS cookie for tracking signing in and sign out. When you sign in, an identifier is set and your credentials (such as name, email and user ID and user type are recalled via a JSON feed.	30 minutes
2fa_session	This cookie is for DataHub Users and Candidates and is a strictly necessary cookie. This is a session cookie for user login. The server checks the session ID in the cookie against the stored session data to authenticate the user. Example: 546d31c62aa24ed4a5f39dd27576aea4:1rd4V3:uA7wubNBxA6zkAghIMsSY3LM SdY	24 hours DataHub Users 30 days Candidates
__cf_bm	This cookie is for DataHub Users and is an a strictly necessary cookie. This cookie contains information related to the calculation of Cloudflare's proprietary bot score and, when Anomaly Detection is enabled on Bot Management, a session identifier.	30 minutes
csrftoken	This cookie is for DataHub Users and is an a strictly necessary cookie A CSRF token is a unique, secret, and unpredictable value that is generated by the server-side application and shared with the company we work with.	As long as the session
ID: sessionid	This cookie is for DataHub Users and is an a strictly necessary cookie. This is a server-specific cookie that cannot be passed to any machine other than the one that generated the cookie. The server creates a "session ID" which is a randomly generated number that	Once you log off or close the browser

	temporarily stores the session cookie.	
ID: _ga	This functional cookie is for Website Visitors and is an optional cookie.	2 years
	Used to distinguish users.	
ID: _gcl_au	This analytics cookie is for Website Visitors and is an optional cookie.	2 months
	This cookie is used by Google Analytics to understand user interaction with the website.	
ID: _gid	This analytics cookie is for Website Visitors and is an optional cookie.	24 hours
	The cookie is used to store information of how visitors use a website and helps in creating an analytics report of how the website is doing. The data collected including the number of visitors, the source where they have come from, and the pages visited in an anonymous form.	
_hjAbsoluteSessionInProgress	This functional cookie is for Website Visitors and is an optional cookie.	30 mins
	This cookie is used to detect the first pageview session of a user. This is a True/False flag set by the cookie.	
ID: _hjFirstSeen	This functional cookie is for Website Visitors and is an optional cookie.	Session only
	This is set to identify a new user's first session. It stores a true/false value, indicating whether this was the first time Hotjar saw this user. It is used by Recording filters to identify new user sessions.	
_hjTLDTest	This functional cookie is for Website Visitors and is an optional cookie.	Session
	When the Hotjar script executes we try to determine the most generic cookie path we should use, instead of the page hostname. This is done so that cookies can be shared across subdomains (where applicable). To determine this, we try to store the _hjTLDTest cookie for different URL substring alternatives until it fails. After this check, the cookie is removed.	

_hjid	<p>This functional cookie is for Website Visitors and is an optional cookie.</p> <p>Hotjar cookie that is set when the customer first lands on a page with the Hotjar script. It is used to persist the Hotjar User ID, unique to that site on the browser. This ensures that behavior in subsequent visits to the same site will be attributed to the same user ID.</p>	1 year
_hjIncludedInPageviewSample	<p>This analytics cookie is for Website Visitors and is an optional cookie.</p> <p>This cookie is set to let Hotjar know whether that visitor is included in the data sampling defined by your site's pageview limit.</p>	30 minutes
cli_user_preference	<p>This cookie is for Website Visitors and is a necessary cookie.</p> <p>The cookie is set by the GDPR Cookie Consent plugin and is used to store whether or not user has consented to the use of cookies. It does not store any personal data.</p>	Session
CookieLawInfo-Checkbox-Necessary	<p>This cookie is for Website Visitors and is a necessary cookie.</p> <p>This cookie is set by GDPR Cookie Consent plugin. The purpose of this cookie is to check whether or not the user has given the consent to the usage of cookies under the category 'Necessary'.</p>	1 year
CookieLawInfo-Checkbox-Non-Necessary	<p>This cookie is for Website Visitors and is a necessary cookie.</p> <p>This cookie is set by GDPR Cookie Consent plugin. The purpose of this cookie is to check whether or not the user has given their consent to the usage of cookies under the category 'Non-Necessary'.</p>	1 year
nabAlternative	<p>This analytics cookie is for Website Visitors and is an optional cookie.</p> <p>Nelio A/B Testing: This cookie stores the variant a visitor is supposed to see.</p>	3 months

nabExperiement sWithPageViews	This analytics cookie is for Website Visitors and is an optional cookie.	3 months
nabParticipation	This analytics cookie is for Website Visitors and is an optional cookie. Nelio A/B Testing: Visitors may or may not participate in your tests. This cookie keeps track of that.	3 months
nabSegmentation	This analytics cookie is for Website Visitors and is an optional cookie.	3 months
Viewed_cookie_policy	This cookie is for Website Visitors and is a necessary cookie. The cookie is set by the GDPR Cookie Consent plugin and is used to store whether or not user has consented to the use of cookies. It does not store any personal data.	1 hour
_hs_initial_opt_in	This cookie is for Website Visitors and is a necessary cookie. This cookie is used by HubSpot to prevent the banner from always displaying when visitors are browsing in strict mode.	1 week
_hs_opt_out	This cookie is for Website Visitors and is a necessary cookie. The cookie is set by HubSpot and is used by the opt-in privacy policy to remember not to ask the visitor to accept cookies again.	13 months
_hssc	This analytics cookie is for Website Visitors and is an optional cookie. This cookie is set by HubSpot and is used to keeps track of sessions.	30 minutes
_hssrc	This functional cookie is for Website Visitors and is an optional cookie. This cookie is set by HubSpot and is used whenever HubSpot changes the session cookie, this cookie is also set to determine if the visitor has restarted their browser.	Session

_hstc	This analytics cookie is for Website Visitors and is an optional cookie.	13 months
	The cookie is set by HubSpot and is the main cookie for tracking visitors.	
Hubspotutk	This functional cookie is for Website Visitors and is an optional cookie.	13 months
	This cookie is set by HubSpot and is used to keeps track of a visitor's identity. It is passed to HubSpot on form submission and used when deduplicating contacts.	

Previous versions:

[Privacy Notice effective up to 20 March 2024 \(for website users only\)](#)

[Privacy Notice effective up to 20 March 2024 \(for Una users only\)](#)

[Privacy Notice effective up to 20 March 2024 \(for DataHub users only\)](#)