

Privacy statement

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The introduction of the General Data Protection Regulation (GDPR) resulted in stricter enforcement of privacy directives and the protection of confidential personal data at a European level. Corporations are expected to take the necessary measures to prevent this data from falling into indeterminate hands. DilemmaGroep attaches great importance to the careful processing of personal data. Your personal data is therefore processed meticulously and secured. This privacy statement describes what personal data DilemmaGroep collects and for what purpose, as well as the measures DilemmaGroep takes to ensure the secure storage and processing of your data.

1. Purpose of data storage

The General Data Protection Regulation (GPC) does not specify any concrete retention periods for personal data. However, in Article 5.1b it is stated that the storage of protected personal data must be for an unequivocal purpose, the amount of data must be limited as much as possible (Article 5.1c), and it is no longer possible to identify the customer other than is necessary in accordance with the purpose (Article 5.1e). Once this purpose has been achieved, the data may still be used for research purposes, provided that this is handled in a sensible manner (Article 5.1b, e).

To comply with this, DilemmaGroep only stores data that are necessary to provide the customer with a full report within the retention period. This means that in addition to the raw responses to the questionnaire(s), any name, gender, age and e-mail address entered will also be saved. In addition to identifying the customer, these additional data are also used to automatically fill in text fields in the report.

In the section 'Categories of data' you will find more information about all types of data that are stored. When the retention period has expired, the test results are anonymised and stored for research purposes, as this does not conflict with the interests of the customer in accordance with Article 5.1b. If the storage of an anonymised test result is not compatible with fair treatment of the customer for any reason whatsoever, these data will be completely deleted.

2. Capture and processing of data

When and/or after visiting the DilemmaGroep websites, or before using DilemmaGroep's services, DilemmaGroep collects two types of user data:

- Traffic data; this is statistical, anonymised data about the visit to the DilemmaGroep website, including data about the number of visitors and which pages are visited;
- Personal data that can be traced back to individual persons, including name, e-mail address (see 'Categories of personal data'). These data are either provided to DilemmaGroep by the personal owner himself on a page of the DilemmaGroep website or by the authorised organisation (e.g. educational institutions, municipalities, coaching/consulting agencies, counselling organisations) on behalf of the owner.

When using our tools, DilemmaGroep uses and stores only those personal data that are directly provided by you or that are explicitly disclosed to us. Data that is no longer required will be deleted. You can also ask for a change or deletion of data yourself, please refer to the contact details at the top of this privacy statement.

Retention period

Article 5.1d requires that the stored data are up to date and, if necessary, updated. The test results that are stored differ from each other in terms of the period during which the data provide an up-to-date image of the customer. This period will be referred to as the expiry date of the test result and will be discussed per test result in the following paragraph. The retention period used by DilemmaGroep is equal to the longest expiry date of the various test results and equals to five years.

Data categories

DilemmaGroep processes and collects personal data solely for the purpose of adequately permitting or informing users about the services of DilemmaGroep. Statistical, anonymized data are processed by DilemmaGroep to gain insight into the accessibility of DilemmaGroep and are used to optimize the websites and services. Statistical, anonymised test data are processed by DilemmaGroep into reference groups for research purposes and the validation of test instruments.

The purpose of the collection of personal data by DilemmaGroep may also include administering the relationship between DilemmaGroep and the user; providing a DilemmaGroep service to the user in an optimised manner; managing the technical infrastructure; answering questions and complaints and providing information to users; conducting market studies and market and user analyses. More specifically, the purpose for processing per data category is described in the table below. In addition to the answers to the questionnaires, a number of additional data are stored in order to identify the customer and to be able to fill in several text fields in automatic, personal reports. These data differ per test website and per customer. The overview below explains which data categories are requested and for which purpose. It also shows which information is requested by default, and which information is optionally included.

Additional data		
Type of data	Reason for storage	Required
First name, middle name, last name	Customer identification, completion text fields in automatic reports.	Yes
Gender	Completion text fields in automatic reports.	Yes
E-mail address	Customer identification, sending automatic reports and link to (re)start questionnaire.	Yes
Date of birth	Insight into the life phase, after expiry of the retention period anonymised into age number for research purposes.	No
Curriculum Vitae	Background information during conventional assessments.	No
Professional sector	Research purposes, links professional sector with test results.	No
Level of education	Research purposes, links educational level with test results.	No
Classification	Research purposes, links context with test results.	No

Privacy test results

The test results will be treated confidentially by DilemmaGroep. We will not communicate your test results to other parties without your permission, unless this is specifically agreed upon in the supervisory relationship between you and your supervisor (e.g. coach, manager, HR advisor, project counsellor, etc.). The organization, through its supervisor, as a user of instruments of DilemmaGroep, is responsible for having the written consent of the candidate when it comes to collecting the above personal data and for maintaining the confidentiality of this information.

Periodically, test data can be used anonymously (i.e. without personal data such as name and e-mail address) by DilemmaGroep within the scope of scientific research. Test results may never be used for commercial purposes unless you explicitly give your consent.

3. Data security

DilemmaGroep takes a large number of measures to prevent unauthorized access to its system and stored data. In addition, data supplied and generated by DilemmaGroep is only processed on servers of ISO27001 and NEN7510 certified data centres within the Netherlands. Access to the user system is through a connection that is secured by an SSL security certificate (HTTPS). Also, the questionnaires can only be completed through a secure connection. The personal data sent is stored in encrypted form.

DilemmaGroep offers the possibility to create different roles with associated authorizations. This authorisation system can be used to set which activities users can perform. All activities within the user system are also monitored and 'logged', so that unusual activities can be noticed and traced at all times.

4. Cookies

DilemmaGroep may use so-called "cookies". Cookies are data sent by a web server to be stored in the user's browser. Cookies enable DilemmaGroep to provide returning visitors with faster and more efficient access to a DilemmaGroep website or the services of DilemmaGroep. In the browser settings, the user and/or organization can disable the ability to receive cookies. This may result in certain services provided by DilemmaGroep no longer being able to be accessed. DilemmaGroep does not use cookies for the purpose of creating user profiles based on browsing behaviour.