

Privacy Notice

Assessment Only Pass (AOP)

1. Scope and Roles

This Privacy Notice applies to the data processing activities carried out in connection with the provision of the **Assessment Only Pass (AOP)** service under the Framework Agreement or any amendment thereto.

In the context of the AOP service:

- the **Client** acts as the **data controller**,
- **FranklinCovey Hungary** acts as the **data processor**,
- **Franklin Covey Co.** acts as the **sub-processor** operating the assessment system, which has a data processing agreement in place with FranklinCovey Hungary and, as sub-processor, applies appropriate technical and organisational measures in accordance with the GDPR.

The processing of personal data is carried out in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR) and all applicable Hungarian and European Union data protection laws.

2. Processing of Personal Data in the Context of the AOP Service

2.1st Transfer of Participants' Data

The Client transfers to FranklinCovey Hungary the following data of the Participants for the purpose of carrying out the assessment: name, e-mail address and position (e.g. manager, individual contributor).

FranklinCovey Hungary uploads these data to the assessment platform and sends out the relevant assessment information/notice.

2.2nd Provision of Respondents' Data

During the 180- and 360-degree assessments, Participants enter the following data of the Respondents on the assessment platform: name, e-mail address and the type of relationship (e.g. manager, direct report, peer, etc.).

The system then sends an e-mail to the e-mail addresses provided by the Participants, informing the Respondents that the Participant has invited them to provide feedback and giving them the information required to access the assessment platform.

2.3rd Conducting the Assessment

Participants and Respondents complete the assessment on the <https://app.franklincovey.com/> website, subject to accepting Franklin Covey Co.'s then-current privacy notice.

3. Categories of Personal Data Processed

The categories of personal data processed in the context of the AOP service include in particular:

- Participants:
 - name,
 - e-mail address,
 - position (e.g. manager, individual contributor);

- Respondents:
 - name,
 - e-mail address,
 - type of relationship to the Participant (e.g. manager, direct report, peer, etc.);
- Assessment results: assessment report(s) generated based on the completed questionnaires.

4. Purpose and Legal Basis of the Processing

The purposes of the processing are:

- performance of the contract with the Client and provision of the assessment service;
- enabling subsequent post-assessment (for comparison) at the Client's request;
- operation of the assessment system and ensuring its security and reliability;
- creation of aggregated, anonymised statistics and global benchmark analyses.

The primary legal bases for the processing are:

- Article 6(1)(b) GDPR – performance of the contract between the Client and FranklinCovey Hungary,
- Article 6(1)(f) GDPR – the legitimate interests of the Client and/or FranklinCovey (in particular system development and quality assurance), provided that these are not overridden by the rights and freedoms of the data subjects.

The detailed rules governing the processing carried out by Franklin Covey Co. are set out in Franklin Covey Co.'s own privacy notice.

5. Data Transfers and Security

The personal data processed:

- are used solely for the provision of the assessment service and, where requested by the Client, for any subsequent post-assessment;
- are not disclosed to any third party other than the parties involved in the processing as set out above (the Client, FranklinCovey Hungary and Franklin Covey Co.);
- may be included in aggregated, anonymised global benchmark statistics, in such a way that data subjects cannot be identified from such statistics.

FranklinCovey Hungary and Franklin Covey Co. apply technical and organisational measures in accordance with the GDPR to ensure the confidentiality, integrity and availability of personal data.

6. International Data Transfers

In the context of the AOP service, the use of the assessment system involves the transfer of personal data to the United States of America.

Such transfers are carried out subject to appropriate safeguards in accordance with the GDPR – in particular, the standard contractual clauses (SCCs) adopted by the European Commission.

The detailed rules governing international data transfers are set out in the FranklinCovey Global Privacy Policy.

7. Retention and Deletion

The personal data processed in the course of the assessment service are retained until the Client submits a **deletion request**.

The Client may request the deletion of the assessment data in writing from FranklinCovey Hungary at the following e-mail address: office@franklincovey.hu

FranklinCovey Hungary will carry out the requested deletion **no later than 5 business days** after receipt of the Client's deletion request and will confirm completion of the deletion to the Client in writing.

The Client acknowledges that:

- following deletion, the assessment reports will no longer be accessible to the Participants;
- previous assessment reports will no longer be available for future comparison (post-assessment) purposes.

8. Data Subject Rights

Under the GDPR, data subjects (Participants and Respondents) have, among others, the following rights:

- the right of **access** to their personal data,
- the right to **rectification** and **erasure** of their personal data,
- the right to **restriction** of processing,
- the right to **object** to the processing,
- the right to **data portability**, where the legal requirements for this are met,
- the right to **lodge a complaint** with the competent supervisory authority.

Data subjects may exercise their rights primarily through the Client, in its capacity as data controller. FranklinCovey Hungary will cooperate with the Client in handling and fulfilling data subject requests.