



# FAQ

## **GDPR - Frequently Asked Questions**

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### **As a client, what personal information does MHS gather on me and why?**

You may visit the MHS website, browse the MHS Online Catalog, or make general inquiries without providing any personal information. Please review MHS' Terms and Conditions for further information. You will need to register with MHS if you would like to make a purchase of our products and services. By completing the purchase process you consent to MHS' Terms and Conditions of Sale and Use.

To purchase MHS products, you must be registered with MHS. The purchase process involves Attestation of Qualification to determine eligibility to purchase restricted products. You may be asked to provide information including but not limited to your name, address, qualifications, and other personal or non-personal information which are required in order to process your purchase request as well as maintain your MHS customer account.

### **What personal information does MHS gather on my clients completing an assessment and why?**

Response Data: Based on your direction, a respondent will be provided a link to complete an assessment. MHS will save the response options they selected. The respondent does have the choice to skip/not answer some or all of the items however you may not be able to score and generate a report if too many items are left unanswered.

Personal Data: As part of the assessment process, the respondent will be asked to fill out information about herself/himself that will be used to score and generate a report. Some data is mandatory in order for MHS to score the report while some data is optional and identified as such. Examples of data that may be asked: name, gender, age, ethnicity, country and occupational information. Additional information may be requested dependent on the assessment being administered.

MHS does recommend using IDs instead of the individual's first and last name when completing an assessment. You would be responsible for assigning and tracking the use of the ID against the client's personal information that you retain in your records.

MHS processes assessment data (Personal and Response) for the purpose of providing services to you. This may include processing the received data in order to identify the assessments associated with your account, score and generate reports for you.

You maintain rights to your data and are entitled to use the personal information that we provide to you as part of our services for your own purposes; however, you are obliged to process such personal information in accordance with your own obligations under the GDPR, and other data protection laws (as applicable) and in accordance with MHS Terms and Conditions of Sale and Use.

### **Are any of the data collected from clients considered sensitive personal data?**

Some of the information, such as ethnicity may be considered sensitive personal data as defined by the GDPR. If requested within an assessment, these fields are optional. Explicit consent should be obtained from the respondent if you require sensitive personal information.

### **Will MHS share my information with anyone else, like marketing companies?**

Under no circumstances does MHS sell, rent, distribute, or release personal information to a third party, unless required to do so by law, in the course of a merger or acquisition, due diligence, or sale of assets. We do not use any personal

information received within the assessment site for any other purposes other than that which it is intended for in providing the product or service.

As a customer of MHS products and services, we may use your information to contact you through marketing materials and additional information about the products and services that we offer. You may opt out of such activity by using the “Opt-out” or “Unsubscribe” link at the bottom of the digital marketing materials or by contacting Client Services at customerservice@mhs.com. Please note that MHS bears no responsibility for the privacy policies and practices of third-party websites that may be linked to the MHS website or to companies that may provide additional products or services. You should refer to those organizations’ privacy policies to learn how they collect, use, and disclose information.

### **How do you ensure my personal information is safe?**

Personal information is protected by MHS through a number of safety measures encompassing all systems and interactions through which personal information is collected and stored. MHS actively monitors all secure information reserves (including but not limited to Order Management Systems (OMS), digital data, ecommerce platforms, and hard copy records) to ensure security measures are maintained at the highest level of security, meeting applicable regulatory and legal requirements.

MHS servers uses Advanced Encryption Standard (AES) 128/256-bit, and Transport Layer Security (TLS 1.2), which is encryption technology that works with the most current web browsers. Encrypts the purchaser’s personal information, test user information, test data, responses, and reports are returned to the Administrator, protecting against disclosure to third parties.

Applications are run on dedicated systems. MHS servers are located in a secure facility, which is monitored 24x7x365 through CCTV in a pass card access-controlled facility. Access is governed by the Principal of Least Privilege (POLP) and only by designated systems administrators. All MHS employees must complete standard security and background checks prior to employment.

### **What will MHS do in the event of a potential breach involving client information?**

In the event that MHS becomes aware of a security breach which MHS believes has resulted or may result in a risk of harm in the unauthorized access, use or disclosure of personal information of our clients, MHS will promptly investigate the matter and notify the applicable parties of such breach within 72 hours. Such investigation will be without delay, consistent with (1) legitimate needs of law enforcement and the Privacy Commissioner’s Office; (2) measures necessary to determine the scope of the breach; (3) efforts to identify the individuals affected; and (4) steps to identify cause of breach and restore the reasonable integrity of our secure server.

All MHS employees are required to contact the Privacy Officer and Chief Technology Officer immediately should a potential breach or any privacy non-compliance issue be suspected.

### **How does MHS use digital information received from website users?**

Our website obtains information that is automatically generated by a user’s Internet Service Provider (ISP). This information may include the IP address, domain types, the browser type used to access our site, the location of the ISP’s servers, the pages of our site that the user views during the visit, any search terms entered on this site, the website address and email address of a user, and any other information transmitted from the user. This information may be collected for system administration purposes, to gather broad demographic information, to monitor the level of activity

on the site, for technical support, and to improve our website by responding to customer interests and needs. MHS does not link IP addresses to personal information.

### **Does MHS use cookies?**

Cookies are small text files that a website transfers to your computer's browser. We may use cookies to measure traffic patterns, to personalize content and to control security. The cookies we use supply non- personally identifiable information, but may identify your computer, browser, and Internet specifications.

### **How long does MHS keep information about me?**

MHS will, as a matter of policy keep on file a record of (i) the products and services you have purchased; (ii) your qualification/certification status; (iii) and your contact information. Should you wish to have these records erased or your account deleted, please contact Client Services at [customerservice@mhs.com](mailto:customerservice@mhs.com).

### **What about data storage and processing facilities?**

MHS processes and stores data in Virginia, United States using a cloud-service datcenter.

The datacenter complies with the EU - U.S. Privacy Shield Framework and the Swiss – U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States, respectively.

Data located in the datacenter is only accessible by MHS administrators with privileged and monitored access insofar as is required so as to maintain MHS services.

### **How do I change or update my personal information or opt out of receiving marketing materials?**

If you want to change, update, remove your personal information please contact Client Services at: [customerservice@mhs.com](mailto:customerservice@mhs.com). You may opt out of receiving digital marketing by using the "Opt-out" or "Unsubscribe" link at the bottom of the digital marketing material or contact Client Services at [customerservice@mhs.com](mailto:customerservice@mhs.com).

### **What if my client changes their mind and chooses not to answer certain questions or would like to opt-out of completing an assessment after they've started?**

Your client can choose not to complete an assessment at any time after they have started. Once started, your client can also choose to skip items they do not want to answer and can also close the web page if they choose not to complete the assessment at all. The partially completed assessment will be saved for 24 hours. After 24 hours, the data will be deleted.

### **How long are the reports kept in the system (as a generated report)?**

Reports are available in the online assessment site for 5 days in your account and then automatically deleted; it will be in our backup file for 10 days and then no longer available.

If the report is deleted within those five days, the report will be saved in the deleted folder for 10 days before its purged. The Administrator can delete the report in the deleted folder however the report will remain in a backup file for 10 days until permanently removed from MHS records.

### **How long are my client's responses and personal data kept in the MHS system?**

The personal information and the responses (considered raw data) are retained in our database indefinitely so that you can re-generate reports when needed. You, as an Administrator have full control over the data and can delete the data at any time.

Assessment Data (personal information/responses) can be deleted at any time by the Administrator and remains in a backup file for 10 days until permanently removed from the MHS database.

### **Who is responsible for getting the client's consent when completing an assessment?**

The Administrator of the assessment is responsible to obtain all legally required consent from the respondent taking an assessment and, if applicable, their parents or guardians, for the collection and processing of data through any MHS digital platform.

### **How does this legislation impact on the use of assessments such as EQ360 where we are collecting names and email addresses?**

Consent is required prior to an Administrator providing an individual's name, email address and any other information for the purpose of completing an assessment as part of the EQ360. That means you must obtain the consent of an individual who you would like to participate in a 360 evaluation before beginning the assessment.

### **What additional actions have you, as an organization taken with regards to the GDPR regulations?**

MHS has assessed where and how our relevant services along with our commercial website and ERP collect, use, store and dispose of personal data and update our policies, standards, and documentation accordingly, with all policies updated on an annual basis.

MHS will update our corporate Security and Privacy policies as well as any Terms & Conditions on our digital delivery platforms and commercial website to meet changes to GDPR requirements as and when they take effect.

All MHS employees complete data privacy and security awareness training annually and incorporate any changes accordingly. MHS' Privacy Officer and Chief Technology Officer review, inform, advise and monitor compliance. MHS implements changes as appropriate that support the process, provide necessary security and ongoing delivery of MHS products & services.

### **The European Court of Justice recently invalidated the EU-US Privacy Shield Framework. How does that impact my use of MHS products and Services?**

Customers who need to enter into additional protections under the GDPR can do so via a Data Protection Annex or can incorporate these into their existing Agreement with MHS. To do so please contact MHS at [privacyofficer@mhs.com](mailto:privacyofficer@mhs.com).

### **What is the process if someone wants to delete, correct, transfer, or access his/her data?**

The Administrator of the assessment can provide/modify and/or delete a respondent's information within an MHS online assessment account. Any assessment responses entered are not subject to change after the assessment report has been generated.

In order to delete/update an MHS account please contact MHS Client Services at [customerservice@mhs.com](mailto:customerservice@mhs.com) for further information. Please note that as part of this process, you will be required to submit the specific details surrounding your

request in writing.

**Who should I contact if I require additional information pertaining to MHS compliance to the GDPR?**

You may contact the MHS Privacy Officer at [privacyofficer@mhs.com](mailto:privacyofficer@mhs.com).