

| Data Protection Impact Assessment (DPIA)

FAQ

Thomas' Data Protection is outlined in **PG47_Data Protection Policy**, these FAQs provide supplementary documentation.

Scope

Where 'Thomas' or 'Thomas International' is referred to within this document, we include any subsidiary of TIQ Topco Ltd. Specifically our trading businesses in the UK, France, Belgium, Holland, Malaysia, Hong Kong, South Africa and Australia.

As the organization investing in new services, you will most likely need to complete a DPIA. This is a guide to assist you in completing your DPIA when working with Thomas International.

1. Questions you will need to answer when completing your organisations DPIA:

- What does the project aim to achieve?
- What are the benefits to your organization?
- Who are the data subjects?
- Does the data processing actually achieve your purpose?
- Is there another way to achieve the same outcome without using personal data?
- Is the processing proportionate to the purposes you are seeking to achieve?
- Will the project result in decisions or actions against individuals in ways which can have a significant effect on them?
- Who else do you need to involve within your organization?

2. Questions and answers to assist you company with the DPIA:

Q) What personal data will Thomas be using?

A) Thomas will be using a data subject's name, surname and email address.

Q) Does Thomas collect special category or criminal offence data?

A) No- Thomas does not collect special category or criminal offence data when conducting assessments.

Q) How will information be collected?

A) Thomas collects the information in the format that you provide the information. This might be via an encrypted email.

Q) What is your lawful basis for processing?

A) We will only collect, use and share your personal information where we are satisfied that we have an appropriate legal basis to do this. Based on the variety of services we provide, we may rely on one of the following legal bases when processing your data;

- you have provided your consent to us using your personal information;
- our use of your personal information is in our legitimate interest as a commercial organisation – in these cases we will look after your information at all times in a way that is proportionate and respects your privacy rights. You will also have a right to object to processing;
- our use of your personal information is necessary to perform a contract or take steps to enter into a contract with you; and/or
- our use of your personal data is necessary to comply with a relevant legal or regulatory obligation.

Q) Where will the personal data be stored?

A) MS Azure Public Cloud within EEA.

Q) Who will have access to the data?

A) The administrator of your company will have access to the data and only authorized personnel of Thomas.

Q) How will access to the data be managed?

A) Thomas ensure that all access to systems is based on the principle of LUA (Least-privileged User Access) with access reviewed across AD on a regular basis and changes made to individuals' access when moving Team/Departments.

Q) How long will data be retained for?

A) Thomas will only keep personal data as long as is reasonably necessary for the purposes for which it was collected, as explained in this notice. When deciding how long we keep personal data we take into account any minimum retention requirements set out in law however, unless otherwise required by law or regulation, this will typically be twelve (12) months following the end of the relevant service.

Q) How will the data be deleted at the end of the retention period?

A) At the end of the provision of service any candidate data is fully anonymised removing any and all PII, to only retain the assessment scores themselves which are used to further inform our product development and research. With the data having any and all PII removed, it ceases to be considered Personal Data as defined in the Regulation.

Q) Will the data be shared outside of Thomas?

A) No- the data will not be shared outside of Thomas.

Q) Will the data be shared outside the UK or EU?

A) No- the data will not be shared outside the UK or EU. Thomas uses MS Azure within the EEA.

Q) How does Thomas safeguard any international transfers?

A) In circumstances where Thomas transfers personal data outside of the EEA, where necessary Thomas puts in place contractual standard data protection clauses which guarantee the same level of data protection as required under EEA countries. In the absence of this, Thomas will have other appropriate safeguards in place as required by Article 46 of the GDPR.

Q) Is Thomas signed up to any approved code of conduct or certification scheme?

A) There is not yet any kind of recognized GDPR global certification scheme in the EU, but Thomas works hard to ensure that we're in compliance with the GDPR. We spend a considerable amount of time and energy to ensure that our data protection practices meet or exceed the highest standards, so that individuals who disclose personal data to us can rest assured that their data is protected. Thomas is also regulated by Professional Councils.