

Personal Data - Privacy Notice

We are committed to protecting your privacy and maintaining the security of any personal information received from (intended for) you and follow strict security procedures (in accordance with the requirements of GDPR) in the storage and disclosure of information.

This notice aims to answer in simple, concise and plain language terms what happens to the 360 feedback (or psychometric profile) information we collect from you/ is provided for you.

Why is the information being collected and how it be used?

The aim of the 360 feedback exercise that you are contributing to, is to support the participant further develop their leadership/ management style and any information you provide/ we collect will form part of a confidential report that will be used for personal development purposes only.

If you are partaking in the Psychometric Profile, the information you provide will only be used to identify your working preference towards a range of leadership dimensions.

We will only use your personal data/ the information you provide for producing the reports we were commissioned to produce and will not:

- Sell, rent or exchange the information with any other third party
- Use it for any marketing purposes
- Move it outside of the UK

What information is being collected?

We only collect the minimum amount of relevant information needed to produce a participants 360 feedback or Psychometric Profile report. We hold 'low level' personal data (your first name, surname and email address) and any 360 feedback ratings or written comments provided by (or for) you. Therefore it includes some or all of the following:

- Name
- Email Address
- A string of numerical data to represent responses to a set of questions
- A string of text data to represent any free text comments

For those using the Psychometric Profile, we only hold their email address and answers to the profile questionnaire.

Who will the information be shared with?

360 Feedback Reports are distributed depending on the context and commissioning organisation's needs. The norm would be that they go to the organisations 360 project lead for distribution or directly to the Participant. Reports are treated as 'confidential' and would normally only be seen by the Participant (and maybe a personal/ business coach).

However, this may change between organisations and you should speak directly to your organisations project lead to confirm who the report will be shared with.

How anonymous is the information I provide?

Feedback ratings are anonymised by combining/ aggregating your feedback with the feedback given by other respondents in your group (Direct Reports, Colleagues, and Stakeholders etc.) and are not attributed to an individual. The only exception to this is the 'Manager' feedback which stands alone/ is identifiable unless more than one manager has contributed.

Text responses, whilst merged with others (as above) are unaltered and may therefore be identifiable from the language used or feedback given.

A sample 360 feedback report showing how ratings and comments are displayed can be [downloaded here](#)

We are sometimes asked to produce group reports to assist with identifying trends and collective training needs. In these reports, text comments are removed, no participant or respondent names are shown and all feedback is anonymised. Therefore this no longer constitutes 'Personal Data' (no individual is identified or identifiable).

Who is collecting/ holding the 360 feedback/ my personal data?

The 360 feedback software application is owned and managed by [Lumus360](#) and sat on a secure, dedicated server hosted in the UK by Heart Internet (<http://heartinternet.co.uk>) a subsidiary/ brand name for Host Europe Group.

How to access, update or delete your data

Any 360 feedback information we hold is normally retained for a period of no longer than 3 years (to enable the production of comparative reports if requested) and is then destroyed by secure means.

If you wish to view, delete or update your Personal Data, please contact us at support@lumus360.co.uk or Tel 01291 637380 and we will action your requests within 7 days. When contacting us, it would be helpful if you could provide us with details of your full name, company and email address.