

# Privacy Policy for online assessments administered by TestReach on behalf of Accounting Technicians Ireland

The present privacy policy explains how ATI and TestReach use the personal data collected from you when you undergo an online assessment. The online assessment is administered by TestReach on behalf of ATI and may consist of a test, exam, quiz, survey, or other kind of assessment considered appropriate by ATI for the purposes of the competitive recruitment procedure for which you applied.

### Who are we?

ATI is the "Data Controller" with respect to any assessment-related personal data, it has the decision-making power concerning the data processing concerned.

TestReach is a company based in Dublin, Ireland. It provides a cloud-based solution used to create, deliver and mark any type of assessment. With regard to the processing of personal data within the framework of the online assessment, TestReach is the "Data Processor", which means it processes personal data on behalf of ATI.

For any personal data that TestReach collects through its websites and uses for the purposes related to provision of its service, independently of the assessments performed for ATI, TestReach is the "Data Controller".

## The data we collect

Prior to and during your taking an online assessment administered by TestReach, [may collect, receive or store - using TestReach services - personal information that you provided, which notably includes your name, contact details, [any other personal data processed].

Online assessment may include remote invigilation, a method by which formal exams are supervised over the web. TestReach will record a video taken by your own computer webcam of you sitting the assessment. TestReach will also ask you to show your photo-ID to the camera for identification purposes at the beginning of recording the video.

Should you contact TestReach with support or troubleshooting questions, TestReach may ask you to provide personal information for identification purposes.

When you are taking an assessment using TestReach software and/or the TestReach Desktop Application, As part of the secure audit trail process, it automatically records user access and activity data within the system (for instance, when you logged in, when you logged out, when you answered a question, when you paused, etc).

TestReach also records information about the computer and technology you use to take the assessment. This includes, your IP address, information about the type and

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version of your browser, your operating system, installed drivers and external devices connected to your computer, details of other computer processes running, RAM (random-access memory) and CPU (central processing unit) usage statistics. This is tracked to assist with troubleshooting in the event that an issue arises, and also for security and audit-trail purposes.

The TestReach Desktop Application uses cookies to remember your login details. In particular, TestReach keeps records of the preferred language, username, user ID and organisation ID of the last user that logged in so as to make the next login quicker, as you will only need to type the password. Information kept in the cookies expires with the HTTP Session, which is configured to last 24 hours.

#### How we use your personal data

#### (1) Assessment-related data

ATI will use the information collected for the exclusive purpose of administering assessments.

TestReach may process your personal data for authentication purposes and to record your activity on the computer during the online assessment. The video recording of the assessment has the sole purpose of ensuring the integrity of the assessment process.

Upon instructions of ATI, TestReach may collect and score your responses and derive an assessment score. In this connection, ATI may use the data collected to generate reports about your results.

#### (2) Data related to provision of service

TestReach may collect and use your personal data for the following purposes:

- to provide you with a better user experience and to help make the assessment experience more effective, in particular, by ensuring smooth installation and running of the TestReach Desktop Application;
- for maintenance and improvement of its products and services, including the TestReach Desktop Application;
- when you contact TestReach with support or troubleshooting questions, for identification purposes, to correspond with you regarding the issue and to improve your support experience.

TestReach ensures a similar level of protection to the above data as to assessment-related data.

#### Data storage

All video data is held on TestReach systems for a period of 6 weeks following the online assessment, after which it is deleted, unless particular needs require it be held for a longer period, for example, in the case of an appeal process.

The information about the computer and technology you use to take the assessment which served the purposes of audit trail of the assessment is securely stored in



TestReach database for the duration of the contract between ATI and TestReach, or until ATI specifically instructs TestReach to delete it.

The information used by TestReach with a view to improve its services and technology is stored in a form that does not permit identification.

#### Data sharing and transfer

ATI and TestReach will not disclose your personal data to third parties without your consent unless under a duty to disclose or share your personal data in order to comply with a legal obligation or to protect your security or security of other persons. Where your data is shared with third parties, we will seek to share the minimum amount necessary.

With the consent of ATI, TestReach may disclose your personal data to a third party in connection with a sale, merger, liquidation, receivership or transfer of all or substantially all of the assets of TestReach provided that the third party agrees to adhere to the terms of the Privacy Policy and provided that the third party only uses your personal data for the purposes for which provided it to TestReach.

Assessment-related data on TestReach is stored and processed on servers based within the EU and TestReach does not transmit information to servers in any locations outside of the EU.

#### **Data security**

ATI and TestReach have put in place measures to protect the security of your information, including appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In particular, the data you provide to us is protected using modern encryption, intrusion prevention, and account access techniques.

Furthermore, TestReach is ISO 27001 certified, a quality standard relating to information security management, which covers not only IT systems, but also procedures on the manual handling of data by members of staff. Being ISO 27001 certified, TestReach applies very rigorous standards to the handling and storage of personal information, as well as to any data in general. In addition, access to your personal information will only be given to those employees, agents or contractors who need to work on the assessment services provided, and are bound by strict confidentiality rules.

We have put in place procedures to deal with any suspected data security breach and will notify you of any breach which could seriously interfere with your rights.

#### Legal basis for using your data

We process your personal data on the basis of ATI's legal instruments and its internal rules. We have to process personal data for assessment purposes to ensure that everything is audit-trailed and the integrity of the exams are maintained.



#### **Your rights**

You have the right to:

- request access to your personal information held by us;
- request that we correct incomplete or inaccurate personal information that we hold about you;
- request we delete or remove your personal information when there is no valid reason for us to keep it;
- object to the processing of your personal information on specific grounds relating to your situation.

If you want to exercise the above rights, or for any queries, concerns, or requests you may have in connection with the way your data is collected and used, please contact ATI by:

- sending an email to dp@accountingtechniciansireland.ie
- sending a request by post to 47/49 Pearse Street, Dublin 2