

## Privacy Code.

BrainCompass wants to help you as a professional to make the most of yourself. To achieve this, it is important to identify, recognize, implement and manage your talents and blind spots. A safe and personal development environment is essential here.

Therefore, we pay close attention to your privacy, the confidentiality of the information you share with us, and the safety of our process and online account. To help you understand our values and processes, we have established this Privacy Code. We have tried to write down this Privacy Code as clear and transparent as possible. That is why we will start with a brief summary. This summary will provide a good impression, but is obviously not exhaustive. We therefore recommend you to also read the longer version if you still have questions after reading the summary.

### Summary

The entity responsible for processing your personal data is **BrainCompass B.V., with its headquarters on Westersingel 94 in Rotterdam, the Netherlands**. For questions regarding the processing of your personal information, please refer to **north@braincompass.com**.

1. A BrainCompass is only made for you, not for third parties (like an employer, trainer or coach), and will only be shared with you. After that it is up to you with whom you wish to share your BrainCompass.
2. Participation is voluntarily and we require your express consent. This applies when you have come to us directly, but also if you have been redirected by your employer, trainer or coach.
3. For your online account, in order to send you a DNA kit, and to be able to address you in case you want to contact us, we process your name, address, residence, telephone number, email address, date of birth, professional context (function), DNA key (if applicable), and facilitator.<sup>1</sup>
4. If you choose to have us draw up your DNA profile, we will process your DNA information. We extract your DNA from the saliva you send to us, which will then be analyzed by an extern, ISO17025 certified lab in the Netherlands.
5. To help you understand your personal and professional development, we process survey data. You yourself will provide this data through an online survey system.
6. We have an objective of knowledge. To this end we make your DNA and survey data anonymously available for scientific research. This means that your personal information will be irreversibly separated from your survey and DNA data before the independent scientists use the data.

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<sup>1</sup> A facilitator is the person who substantively guides the participant through the process, and the participant will help to convert BrainCompass into a tangible development process. This facilitator includes a trainer/coach, or HR development professional.

## Full version

The Dutch Personal Data Protection Act (Wbp)<sup>2</sup> regulates the privacy of citizens in the Netherlands. This act, amongst others, regulates which information may be collected by organizations, under which conditions and to what purpose this is allowed, and in which way the processes must be set up to achieve a careful processing of the information. This way organizations and citizens obtain a transparent way of data exchange, where everyone knows what happens to the data and why. The supervisory body of this act is the Dutch Data Protection Authority (AP).

This Privacy Code concerns the processing of personal information by **BrainCompass B.V., with its headquarters on Westersingel 94 in Rotterdam, the Netherlands.** This Privacy Code applies to everyone with a BrainCompass.

A BrainCompass is an online development profile for professionals. A BrainCompass is always established based on an online survey. In addition, participants are able, if desired, to extend their BrainCompass with their biological starting point, based on their biological DNA.

We would like to begin with a brief explanation based on three important pillars under the privacy policy and the chosen solutions concerning the data processing at BrainCompass.

### 1. Individual versus the organization

Organizations face the challenge to make the organization as a whole more successful than the sum of its parts (i.e. the employees that make up the organization). Looking at economics, there are different approaches to achieve this. First of all, we have the optimization from a group approach, in which we focus on control, development and cooperation of and within the group. This type of optimization especially works well in a relatively predictable world in which people act with and along each other according to predefined rules.

However, in this rapidly changing world of today it is more effective to develop the organization looking from the point of view of the individual. By empowering the individual to make better choices and to work more effectively, he/she will take personal responsibility for the end result.

This will create autonomously acting employees and self-managing teams that make the most out of the organization from their own perspective and (substantive) power. The Scottish philosopher and one of the founders of Economics, Adam Smith, already called this the *invisible hand* in 1759.

*BrainCompass therefore always focuses on the individual and the development of the individual.*

It may occur that the individual interests collide with the organizational interests in short term. For example, an employer wants to view the BrainCompass of the employee, but this employee rather

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<sup>2</sup> Wet bescherming persoonsgegevens

not (yet) wants him/her to do that. From our philosophy to focus on the individual follows that we have chosen to share a BrainCompass only with the participant, and never with a third party. In this case, the employer will have to wait until the employee is willing to share his/her BrainCompass. If that moment (for any reason whatsoever) does not occur, the employer must trust the *invisible hand* of Adam Smith: in the long term the interests of the employee always are congruent with the interests of the organization.

## 2. Biological concept of man in professional context

Traditional economics assume that a person is acting rationally and pursues his/her own interests. Experience, however, shows that this is not true. For this reason, as of 1960 behavioral economics, led by the Nobel laureate Daniel Kahneman, have used insights from (cognitive) psychology to better understand the behavior in a professional context. Conscious and unconscious processes in the brain, emotions and gut feelings play an important role here.

With our grown understanding in genetics and neuroscience, however, it appears that this is no longer the domain of the psychological sciences, but more of the biological sciences. This has given rise to neuroeconomics: a part of economics that focuses on the biological brain to understand the thinking and acting of people in a professional setting. The biological brain concerns electrical signals and chemical reactions within the brain that lead us to certain behavior. Up until now the biological brain was the domain of the medical sciences, where questions about sickness and health are central. Neuroeconomics uses the same research techniques, but for answering questions within the professional context about acting at work.

*BrainCompass therefore uses the latest scientific techniques from adjacent (biological) scientific research areas to help professionals understand the way to fully develop themselves in their professional role.*

## 3. Knowledge objectives

The Dutch best known economist and laureate of the Nobel Prize for economics, Jan Tinbergen, already knew: you must be able to divide before you can multiply. BrainCompass was created as a result of scientific research at the Erasmus University Rotterdam, where research from neuroeconomics made it clear that biological processes in the brain are also relevant within the professional context. This scientific background and contribution to further knowledge development still is an important objective within BrainCompass as a knowledge institute. To achieve this, we are closely cooperating with various scientific institutions and disciplines.

We also have an independent Scientific Board that on the one hand guards the integrity and reliability of the model, but on the other hand also guarantees scientific innovation by executing, stimulating or facilitating scientific research based on the data.

*The information collected by BrainCompass is therefore disclosed anonymously to several scientists who, based on this information, perform scientific research that serves the public interest.*

## Data processing and objectives

In order to help participants to understand their own talents and blind spots, we have developed the BrainCompass based on the latest scientific knowledge. A BrainCompass combines information from different sources into a personal feedback report that participants can view in their own personal online account. To do this, we process the information of the participants. Here we make a distinction between different types of information:

- A. Account information.** This regards the name of the participant, address, residence, telephone number, email address, date of birth, professional context (function), group, photo, brief description, DNA key (if applicable), and facilitator. To monitor the process around the progress of the BrainCompass of a participant and, if necessary, make adjustments, BrainCompass also holds a record of the status of the questionnaire (*“completed or not completed”*), and if applicable also the status of the DNA analysis (*“sent to the participant, returned at BrainCompass, sent to the lab, or results returned at BrainCompass”*). BrainCompass processes this information (i) to identify participants, (ii) for communication purposes, (iii) to manage the online account, (iv) for billing purposes, and (v) to carry out administration (for example sending a DNA kit to the address of a participant if he/she chooses to have his/her DNA analyzed).
- B. Survey information.** This consists of the answers the participant provides for the online survey he/she completes in his/her online account. It includes: (i) actual biographical details (this includes information on the race of the participant), (ii) details on the world view, (iii) the personality of the participant, and (iv) the professional mindset of the participant. We process this information to create a BrainCompass for the participant.
- C. DNA information.** This is a sample of saliva the participant facilitates to BrainCompass (only if the participant chooses to perform a DNA analysis). The information is derived from the analysis of this sample of saliva. It concerns information that is specifically relevant for the various biological systems in the brain that are important in the professional role of the participant. We process this information to create a BrainCompass for the participant.

## Special (personal) information

The Dutch Personal Data Protection Act (Wbp) distinguishes between general and special personal information. Special personal information benefits from more protection in the law than general personal information, as it concerns issues that are (more) deeply ingrained in the person’s personal life. Should there be a case of processing special personal information, there will be additional requirements to the way in which this information is exchanged and processed. Within BrainCompass we consider two types of special personal information to be relevant.

- A. Personal information regarding a person’s race.** For proper processing and interpretation of the DNA information, it is essential to include the ethnic background of the participant. It is

also a control variable that is of crucial importance for executing the scientific research in a proper way.

- B. Personal information regarding a person's health.** With DNA information people often immediately think of the medical field. This is because until recently the medical sciences had a monopoly on biological indicators, where they are used within the field of sickness and health. With the arrival of neuroeconomics these biological indicators (in this case DNA) also appeared to be valuable to help people understand their thinking and acting at work. BrainCompass therefore uses a technique from the 'field of health', but does not look at sickness related information. We focus purely on the professional context of the participant.

We would like to look at this in more detail. Our DNA contains many information, including, amongst others, our predisposition for certain diseases and disorders in the medical field. Typically, DNA research is performed using so called Genome Wide scanning techniques. Using these techniques, a large part of the DNA profile is mapped (ranging from 300,000 to 62,000,000 genetic pieces of information). After all of this has been mapped, subsequently a (software based) filtering is performed that, though all the information is known, clarifies the specific pieces of DNA needed for the research. BrainCompass, however, has decided – against the usual practices – to make additional investments in a method that does not map the entire DNA profile of a participant and afterwards applies this filter. The analysis technique that BrainCompass uses, works as follows: already at the stage of the biological analysis of the saliva it is clearly predefined which pieces of DNA will be looked at. This means that the remaining DNA will not be analyzed and therefore will not be available. Not for the participant, nor for BrainCompass and neither for the lab assistant/machine that performs the analysis. This will prevent that – from our scientific perception – information regarding a person's health are processed.

However, health is a wide (and ever widening) field. As different scientific disciplines are merging, it is ever more difficult to draw the line between the professional, personal and health domain. BrainCompass therefore chooses to treat the information on DNA that we process as (personal) information about the health of the participant and therefore comply with the applicable laws and regulations. This way BrainCompass can ensure that the privacy of the participant is properly guaranteed, independent of the substantive discussion on biological data and information regarding health, which will continue to increase the following years. Both from the laws and regulations as well as from the content.

*Processing the above mentioned personal information is only permitted by law if the information is processed with the express consent of the person involved. This is only possible if the person involved provides this personal information voluntarily and is fully informed about what information is involved and the purpose for which the information is needed. We will ask you this permission when creating a BrainCompass.*

## Processing

Participants arrive at BrainCompass through different channels. This can be directly, because they started looking for themselves or if they heard about BrainCompass from an acquaintance. In addition, it can also occur that they arrive at BrainCompass indirectly, for example because they have been redirected by their employer, a trainer or a coach.

However, for the relationship between the participant and BrainCompass it does not matter through what channel they met. From our philosophy to focus on the individual, it follows that BrainCompass will in any case build and maintain a direct relationship with the participant. The processing of the (personal) information therefore proceeds as follows:

1. A participant orders a BrainCompass himself or through an employer, trainer, coach or else. BrainCompass will then process the first name, last name, email address and information regarding the professional context of the participant.
2. A participant will receive a notification physically or by email regarding his registration, including information about the substantive background of a BrainCompass, the Terms and Conditions and the Privacy Code of BrainCompass.
3. Based on this information a participant will decide if, and if yes, in what way, he would like to have BrainCompass draw up a BrainCompass:
  - a. If a participant decides *not* to have BrainCompass draw up a BrainCompass, the order will be forfeited.
  - b. If a participant *does* decide to have BrainCompass draw up a BrainCompass, this can be executed with or without a DNA analysis.
4. If a participant has chosen to have a BrainCompass drawn up, he will receive an invitation by email to activate his personal online account on the website of BrainCompass ([www.braincompass.com](http://www.braincompass.com)), at which moment the participant has to agree to the Privacy Code of BrainCompass. Through this personal online account, the participant will also have access to the questionnaire (which he can complete at his own time).
5. If a participant has chosen to have a BrainCompass drawn up including the execution of a DNA analysis, the participant will receive a DNA kit from BrainCompass. This can be done by post or physically. The participant will use the DNA collector and the return box in the DNA kit to extract DNA and return it to BrainCompass (this can also be done physically or by post).
6. As soon as BrainCompass receives the DNA kit from the participant, BrainCompass will inform the participant and will send the DNA kit for DNA analysis to an external ISO17025 certified lab in the Netherlands. A unique key ('DNA key') is used here to be able to link the DNA kit to

the associated participant without the need to share other information (e.g. account information) with the lab.

7. After the DNA analysis of the participant is completed, the lab will digitally send the results to BrainCompass through a secure connection. Then BrainCompass will post the results on the online account of the respective participant.
8. As soon as both the Survey data and DNA information (if the participant has chosen to have a DNA analysis performed) are known at BrainCompass, a BrainCompass is drawn up for the respective participant. This drawn up BrainCompass will then only be provided to the participant (and nobody else) and can be viewed by him through his online account and, if desired by the participant, his BrainCompass can also be downloaded as PDF document.

## Science

Choosing BrainCompass is choosing for the most modern way of professional development. In order to keep providing participants with state-of-the-art knowledge, BrainCompass supports independent scientific research with its data. For this purpose, the anonymous data of BrainCompass is used, which implies that any personal information is irreversibly removed from the data before the scientists gain access to it.

*When drawing up a BrainCompass, we will ask you permission to implement your anonymous data for such scientific research.*

## Reference group

A BrainCompass helps professionals to understand their natural talents. Absolute information on a talent, however, is difficult to interpret. For example: what does it actually mean if you 8 'feel socially connected' on a scale of 1-10. In order to make a BrainCompass for the participant of practical value as well, a BrainCompass is drawn up based on relative information. In what way does the participant relate to his reference group? Knowing that 20 % of the professionals feel more 'socially connected' than you do, is valuable information. This reference group is a *live* reference group. This means that – within a specific professional domain – everyone with a BrainCompass forms part of the reference group. Of course other participants do not know who is a part of the reference group, nor are they able to see the results of another participant within the reference group.

*When drawing up a BrainCompass, we will ask you permission to use your data anonymously as part of the reference group.*

## DNA key

To have the DNA information carefully processed, every participant receives a DNA key. A DNA key is a code consisting of 14 digits that is delivered with every DNA kit. This DNA key has two functions:

- A. Two-factor authentication.** Participants log into their personal online account with a chosen username and password. In order to view their DNA information, they have to log into the increased privacy layer of the application. To do this, they have to enter their DNA key.
- B. Pseudo anonymity.** If possible, we will process your survey and DNA data separately from your account information. This is achieved by processing the data under the DNA key. This is specifically relevant in the following situations:
  1. During the returning and shipment to the lab, where the DNA is contained in a package transported by the postal service. The DNA still has the form of saliva, which means that the DNA information itself is not yet known.
  2. During the analysis by the lab, where it is of course treated under the ISO norm in strict confidentiality.
  3. During the return of the DNA results from the lab.

## Retention period

BrainCompass collects the information of a participant at the time this participant is in contact with BrainCompass in any way or has ordered a BrainCompass to be drawn up. Regarding this information, BrainCompass makes a distinction between two categories: (i) a participant cancels the BrainCompass to be drawn up after first contact or after an order, or (ii) a participant will have a BrainCompass drawn up, whether or not with a DNA analysis. For this first category BrainCompass will retain the collected information up to 1 year after the final contact with the respective participant. For the second category (ii) BrainCompass will retain the collected information up to 2 years after the final contact with the respective participant. In addition, BrainCompass notes that should a participant request BrainCompass to remove the information before that time, BrainCompass will comply. The participant does not need to give a reason for this removal.

## Sharing information

We only provide your BrainCompass to you and will never on our own share substantive, non-anonymous data (like survey data and DNA data) with third parties. Only at your express request we will share your BrainCompass with third parties appointed by you. Otherwise only (specific) information will be shared with third parties in the following way:

1. We only share survey data and DNA data anonymously with scientists and other participants for scientific and statistical purposes (for which we will ask your permission when drawing up a BrainCompass).

2. If your trainer/coach has pointed BrainCompass out to you or if your employer has given you the opportunity to have your BrainCompass been drawn up, we will provide them with information about the progression of the process.
3. If you have chosen to send the invoice of BrainCompass to your employer, we will provide your name to your employer.
4. If you have chosen to have a DNA analysis performed and want to receive this DNA analysis by post, we will share your name and address details with PostNL (as package delivery service) to deliver a DNA kit at your office or home address.

## Security

Data protection is important for us and we will always take reasonable, appropriate security measures to protect the personal information we collect against loss or any form of illegal processing.

## Cookies

The website of BrainCompass uses cookies. Cookies are small text files stored on a participant's computer when he visits the BrainCompass website or logs in to his online account. We use cookies to navigate through the website and the platform easier and faster. They also help us to understand how users use the BrainCompass website.

## Comments from participants

On the BrainCompass website comments are regularly posted including a photo of the participant. These comments are only posted after express prior consent of the person involved. To ask for this permission, we only use the personal information already known to us. If we approach you for this, but you are not interested, we will of course respect that.

## Right of access and correction

In the Dutch Personal Data Protection Act (Wbp) the right to access and correct personal information is determined. Every participant with a BrainCompass has the right to access, modify or remove his/her information, provided that the intellectual property of BrainCompass regarding the BrainCompass model is not compromised. For example, we cannot share the algorithm that converts the survey data into the BrainCompass. Accessing, modifying or removing information is possible without giving any reasons. For accessing and correcting information, you can contact [north@braincompass.com](mailto:north@braincompass.com).



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54690692

**VAT**

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In addition to this Privacy Code, the supply of all goods and services by BrainCompass apply to the Terms and Conditions. These Terms and Conditions are available at [www.braincompass.com](http://www.braincompass.com) and are filed at the Chamber of Commerce under number 54690692

## Contact

BrainCompass considers it of great importance to respect the privacy of participants and visitors to the website. Personal information from partners, clients and visitors are treated and secured with utmost care.

Do you have any questions? Please contact us at:

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