OneTrust
PRIVACY, SECURITY & TRUST

Assessment Details

ID 14410

Name Sova Pilot

Organization Central Business (Global)

Description

Privacy Officer Ana Castellano

Respondent Juress Bontia (External),Johnery Mark Idio

Template PRA - Privacy Risk Assessment

Workflow Default Assessment Workflow

Creator Johnery Mark Idio

Date Created 15/11/2021 10:00

Deadline

Completed Date 01/12/2021 09:46

Submitted Date 23/11/2021 08:04

Last Updated 01/12/2021 09:46

Stage Completed

Approval Stage

Very High Risks 0

High Risks 1

Medium Risks 0

Low Risks 0

Total Risks 1

Residual Risk Level High

Residual Risk Score 6.0

Result Approved

Result Comments
> **Under Review** (Ana Castellano - Approved) This project is approved from a Global perspective, provided that local DPA's review this PRA pursuant to local requirements, and give their sign off before rolling out the new platform. ;

Primary Record Id

Primary Record Name

Template Version 54

Project Version 1

Open Risk Count 1

Open Info Request 0

Tags

Submission Progress (%) 85

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Assessment Questions

1 **Privacy Screening Questions**

1.1 **What is your project and its purpose, and why are you collecting personal data?**

Response

This project is on piloting a new potential assessment provider called Sova, A digital platform that provides online psychometric screening assessments, video interviews and virtual assessment centre technology for use with the selection process. The pilot project will be done to the following markets: Australia, Colombia and Sri Lanka. This project is headed by Global Recruitment, UFLP T&O and HR IT. The platform will be used by Unilever as part of the UFLP selection process hence the end users will be Unilever potential employees/candidates. The data collected will be used to: 1) For us to give them access to the Sova platform. 2) Able to assess each candidate if they will pass on the set standards for UFLP roles.
For this particular pilot, Unilever-Sova won't leverage AI. Unilever will co-create and agree with Sova a robust set of criteria to measure candidates with through a battery and suite of assessments to establish effective benchmarks that fairly progress or disposition potential candidates. There is also potential in this pilot to leverage Sova's digital interview functionality whereby Unilever created case studies will be used to assessed the candidate's response in the said medium.

1.2 **Who will you be collecting personal data from?**

Response

Prospective Employees

Explanation

The platform will be used by Unilever as part of the UFLP selection process.This is for graduates that would like to apply in UFLP. This pilot will assess the efficacy and effectiveness of the platform to assess/screen potential UFLP candidates

1.3 **What personal data will you collect? Please select all that apply**

Response

Last Name   Candidate Assessment Score   First Name
Email Addresses

Explanation

First Name, Last Name and Email Address - these are needed for the candidates (prospective employees) to access the Sova pilot portal for the UFLP assessment. Candidate Assessment Score is needed to access each candidate if they meet the UFLP role standard requirements. Additionally, Age, Gender and Ethnicity(Disability at this point is still TBC) are purely optional fields for candidates to fill up or disclose during the assessment. These fields are made optional as having these filled up will help ensure the assessment models are not introducing any bias/adverse impact towards these diversity groups. For this particular pilot, the AWS data centre in Dublin, Ireland will be used.

1.4 **How many individuals will you collect personal data from, or how many individuals will be impacted?**

Response

1,000-10,000 individuals

Explanation

~7000 to be specific based on historical application volumes.

1.5 **Does this Privacy Risk Assessment relate to a marketing campaign?**

Response

No

Explanation

None

1.6 **Have you engaged with the Cyber Security Risk Management team (previously Information Security) for this project?**

Response

Yes

Explanation
We are already done with the ICAA of this.

1.8 **Does this project or activity involve any of the following activities?**

Response

> Using data collected for profiling activities or evaluating individuals' behaviour / digital activity

Explanation
The platform will be used by Unilever as part of the UFLP selection process.

Risks

🚩 **Inherent Risk Level**
6.0 - High Impact / High Probability

🚩 **Residual Risk Level**
6.0 - High Impact / High Probability

Risk Category
Privacy

Stage
Identified

1.10 **Thank you for completing the Privacy Screening Questions! It looks like we need more information from you to understand your project or activity in more detail. Please move to the next section Demonstrate Accountability and Governance and complete all questions up until question 6.4**

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(2) **Demonstrate governance and accountability**

2.1 **Please start typing the name of your project or activity and then select 'Add Option' to create a new project or activity.**

Response

> Sova Pilot | Global Recruitment

Explanation
None

2.2 **Who is the responsible business owner and which Unilever business function will be leading this project?**

Response

Sova Pilot | Global Recruitment

> *Response*
> irem.ozbalyali@unilever.com
>
> *Explanation*
> Irem Ozbalyali the head of Global Recruitment.
> She will be working with Lisa Andrews UFLP Global Head. Both will be supported by HR-IT

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(3) **Processing of Personal Data**

3.1 **How do we obtain the personal data for this activity?**

Response

> We actively collect the personal data directly from the individuals

Explanation

The candidates need to sign up to be able to access the platform that will be used for UFLP application.

3.5 **If this activity is a new marketing activity, are you collecting consent from our consumers?**

Response

Not Applicable

Explanation
None

3.6 **Please name any IT systems or services that you will be using to collect or store the personal data for this project.**

Response

1. The data is collected using **[AWS/Cloud computing)**
2. The personal data is stored in **(AWS/data center) in Dublin**

3.7 **Please name all 3rd parties including any suppliers involved in this project or activity.**

Response
Sova pilot team - leading and managing the pilot from vendor side
Recruitment+UFLP+HR IT Core team - leading and managing the pilot from Unilever side

3.8 **Do you have a contract in place with the 3rd party including appropriate data protection provisions?**

Response

Yes

Explanation
NDA is in place. Pilot contract being finalized and to be completed by November 24.

4 **Understand the purpose and objective**

4.1 **Which Unilever teams or external parties will have access to the personal data within this project and why?**

Response

Sova Pilot | Global Recruitment

> *Response*
> HR UniOps
>
> *Explanation*
> +Sova pilot Project team

5 **Be Transparent**

5.1 **How will you inform individuals that you will be collecting/using their personal data in this way in the project?**

Response

All of the above

Explanation
None

Comments

Ana Castellano   *01/12/2021 09:28*

To access the platform, the candidate will receive an email with instructions and will have the opportunity to review <u>UL's Recruitment PP and Sova's PP</u>. They will also consent to having their data processed. See Sova's Consent screen sample below

Your responses to this assessment will be kept strictly confidential and only used for the stated purpose of this assessment process.

*The assessment process utilises an online assessment tool provided by Sova Assessment Limited (***Sova***). Sova acts as data processor in relation to the online assessment process. Further information about Sova, its processing of your information and its approach to privacy can be accessed [here](#).*

Your responses to this assessment will be kept on Sova's secure online server and used as part of the employer's assessment process.

Personal information will be kept for as long as is necessary to enable the proper completion and evaluation of the assessment process, as determined by the employer and in accordance with industry best practice.

Following the completion of the assessment process, Sova may store and analyse responses to enhance its models and methodology but will only do so in fully anonymised form.

One of the features of the Sova system is the option to use automated decision making for the purposes of assessing which candidates are best matched with role requirements, and from this deciding whom may be moved to the next stage of a selection process. The automated process is an online assessment which has been validated and reviewed to ensure fairness.

Please click the appropriate button below to confirm whether you agree to the processing of your personal information in this way as part of the assessment.

"I agree to the use of my data and automated decision making in the processing of my responses to the assessment"

5.2 **Will you transfer any personal data to any other country outside of the original market? If so, please list all countries.**

Response

Yes

Explanation

According to Sova's Technical Overview, the platform can be hosted in any region where Amazon Web Services (AWS) has data centres. For these 3 pilot markets, data will be stored in the Dublin Data Centre.

Unilever UFLP central team is remotely based and spread across UK, South Africa, Russia, Turkey, Sri Lanka and Philippines

6   Maintain proportionality

6.1 **How will you ensure that only the minimum amount of personal data will be collected to achieve this project's purpose?**

Response

Yes only the very minimum data and fields will be captured to provide candidates access to the platform and assess them accordingly

6.2 **How long will personal data be stored for?**

Response

Sova Pilot | Global Recruitment

Response
0-6 months   1-2 years
Explanation
Will follow standard data retention policies set per pilot country

6.3 **What is the procedure for deleting personal data when it is no longer required?**

Response

Personal data deleted automatically from
system after retention period

Explanation
None

6.4   **Thank you for completing the additional questions! Please click 'Submit' to finish this assessment.**

6.5   **The following sections must be completed by the Data Protection Advisor or the Global Privacy team for central projects. Please click "yes" to continue with the assessment.**

Response
Yes

Explanation
None

6.6   **Please summarise the most significant privacy risks in this assessment**

Response
Considering that (i) for this particular pilot, Unilever-Sova won't leverage AI or have video interviews reviewed automatically; (ii) We will clearly inform cnadidates about the processing of their data (both UL's and Sova's Privacy Notice) and obtain their consent and (iii) Sova has presented a robust compliance programme, we do not foresee a high risk.

This project is approved from a Global perspective, provided that local DPA's review this PRA, pursuant to local requirements.and give their sign off before rolling out the new platform.

6.7   **Please summarise the actions that are required from the business to reduce the risks identified.**

Response
Not Answered

6.8   **Has the business owner confirmed their willingness to implement the mitigating actions to bring the risk to an acceptable level?**

Response
Not Answered

Explanation
None

6.9   **Do any of the privacy risks need to be escalated?**

Response
Not Answered

Explanation
None

6.10   **If you are a Data Protection Advisor in a market within the European Economic Area (EEA), do you need to create a new ROPA inventory record for the purposes of Article 30 of the GDPR?**

Response
Not Answered

Explanation
None

Assessment Notes