

Privacy Notice

Aon is a leading global professional services firm providing a broad range of risk, retirement, and health solutions. Aon is committed to protecting your privacy. This commitment reflects the value we place on earning and keeping the trust of our customers, business partners, and others who share their personal information with us.

What does this Privacy Notice do?

This Privacy Notice ('Notice') explains Aon's information data processing practices, namely our talent services. This includes our assessment and feedback systems.

Who are we?

Throughout this Notice, "Aon" refers to Aon Human Capital Solutions GmbH, as well as its affiliated companies and subsidiaries (also referred to as 'we', 'us', or 'our'). You can contact us regarding information contained within this Privacy Notice and the associated services:

Aon Human Capital Solutions GmbH
Caffamacherreihe 16
20355 Hamburg
Germany
+49-40-3250 389-900
gdpr.assessment@aon.com

Our Data Protection Officer can be contacted using these same details.

Who is responsible for your information?

As Aon typically acts as a Processor for your personal data (we only process it on instruction). Our customers are primarily responsible for decisions about your personal data. This makes them the Controller. Your Controller is therefore the entity for whom you complete this assessment/feedback. You can also contact them directly regarding questions about your personal data.

When and how do we collect your information?

We collect your personal data in two ways: (i) provided to us by our customer in order to provide you with the service, and (ii) collected from you directly whilst you use our services.

What information do we collect?

We collect specific personal data to provide our talent services:

- *Identification information* (e.g., title, first and last name, date of birth, gender). This is provided by you or by our customer.
- *Technical Information* (e.g., public IP address, time and date of access, browser activities, browser settings, device information and Log-In ID data). This is used primarily for security purposes, namely authentication and input control.
- *Assessment Information* (e.g., your answers, test duration, assessment results)
- *Feedback* (e.g., your opinions, responses, and attitude on your own or another's performance)

- *Sensitive or Special Information* (e.g., health, ethnicity). We may collect this personal data where video material of you is created during a video assessment. We will notify you again and collect your consent if you are affected by this.

Please note that we do not sell your personal information according to the CCPA. We only provide your personal data, including assessment results or feedback, back to the customer who contracted us for the services or parties directly involved with us in providing the services.

How do we use your personal information and what is the legal basis?

We use your personal information in order to provide our talent services in accordance with the contractual relationship we have with our customers. In most cases, the processing is justified as follows:

(i) The provision of the assessment services.

The legal basis of our customer for the processing of assessment information is such processing being necessary for the performance of a contract, or to take steps (at your request) to enter into a contract, since completing the assessments is a necessary step in obtaining or maintaining an employment position. Without the provision of your personal data, we would not be able to carry out the services to achieve this. This means that participating in the assessments are voluntary, although this may affect your relationship with our customer.

If the customer has an alternative legal basis, they will notify you of this separately.

Insofar as Aon uses your data for aggregation and de-identification for benchmarking, market research, and data analysis purposes, this data is anonymised in advance, and it is therefore no longer possible to draw conclusions about you as a natural person. The process of anonymising your data is based on Aon's legitimate interest in analysing products offered and their distribution as well as ensuring the development of Aon's products and services.

For special categories of personal data processed by vidAssess (video assessment tool) or the Virtual Proctoring tool, consent is the legal basis for processing. Furthermore, where you require special assistance with the completion of the assessments, and special categories of personal data are necessary to assess this (e.g. health data), this is also done on the basis of your consent. Where this is applicable to you, you will receive more information at that time, as your consent is collected additional to this Privacy Notice.

(ii) The provision of the feedback services.

The legal basis for the processing of feedback information is your consent. Where this is applicable to you, you will receive more information at that time, as your consent is collected additional to this Privacy Notice.

(iii) Optimisation and statistical analysis.

Where possible, we only process anonymised data sets for this purpose. Generally, personally identifiable information is removed from any data sets before they are used for statistical and scientific analysis by Aon, unless the customer has requested otherwise. The legal basis is the same as described under (i).

Where the analysis relates to video data, anonymisation is not possible. Aon, however, ensures the utmost technical security for this analysis and only shares such information with contracted service providers who are directly involved with the analysis for the improvement of Aon's systems. Our customers are also informed. The legal basis for such analysis is legitimate interest, as Aon has a legitimate interest in optimising the video interview service.

(iv) Cookies

When using our talent services, cookies are stored on your device. These cookies can include:

Cookie	Purpose	Duration
Homehub_AntiForgery	This cookie is used to protect against malicious exploit of the website.	Session
Homehub_Session	This cookie is set at registration and authenticates the user against the application.	Session
Homehub_Lid	This cookie saves the requested language, so that the language is presented again when re entering the system.	30 days

These cookies are functionally necessary to offer the service, meaning they are technically important for making sure our systems work correctly. The legal basis is legitimate interests, as there is a legitimate interest in ensuring the successful delivery of the service.

You can prevent the storage of cookies through the settings of your web browser, or by managing your settings so that cookies are deleted once you close your browser. Please note that a complete disabling of cookies will impact on your ability to use this service, especially upon its quality. You can also contact Aon at gdpr.assessment@aon.com about disabling or deleting cookies.

We do not employ any third-party or tracking cookies to provide this service. You can easily revisit this information any time by going to our “Cookies” hyperlink or revisiting this Notice.

Do we collect information from children?

We do not directly provide services to children, and we do not knowingly collect personal information from children, unless otherwise directed by our customer.

How long do we retain your personal information?

We do not store your personal data for any longer than we need to for our above stated purpose. Generally, the period of our processing is decided by our customer. Where we do not receive specific instructions from them, we store your personal data for a period of twelve months. After this, they are either irrevocably anonymised or deleted. Beyond this, we only store your personal information pursuant to any applicable legal requirements.

Do we disclose your personal information?

We share your personal information with our customer, that is, the business entity with which we have a contractual arrangement. Beyond this, we only share personal information as follows:

Within Aon

We may share your personal information with other Aon entities, brands, divisions, and subsidiaries in order to provide the assessment services.

We do not rent, sell, or otherwise disclose personal information with unaffiliated third parties. We do not share your personal information with third parties except with our customer and in the following circumstances discussed below.

Authorized Service Providers

We may disclose your information to service providers we have retained (as *processors*) to perform services on our behalf. These service providers are contractually restricted from using or disclosing the information except as necessary to perform services on our behalf or to comply with legal requirements.

These third parties appropriately safeguard your data and their activities are limited to the purposes for which your data was provided.

Legal Requirements and Business Transfers

We may disclose personal information (i) if we are required to do so by law, legal process, statute, rule, regulation, or professional standard, or to respond to a subpoena, search warrant, or other legal request, (ii) in response to law enforcement authority or other government official requests, (iii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, (iv) in connection with an investigation of suspected or actual illegal activity or (v) in the event that we are subject to a merger or acquisition to the new owner of the business. Disclosure may also be required for company audits or to investigate a complaint or security threat.

Do we transfer your personal information across geographies?

We generally do not transfer your personal data cross border unless we have agreed such with our customer. Where we are permitted to transfer your personal data cross border in such a way, or are ourselves the controller for your personal data, we may do so. We are a global organisation and may transfer certain personal information across geographical borders to our authorized service providers or business partners in other countries working on our behalf in accordance with applicable law. Our affiliates and third parties may be based locally, or they may be overseas - some in countries that have not been determined by the European Commission to have an adequate level of data protection.

When we do, we use a variety of legal mechanisms to help ensure your rights and protections travel with your data:

- we ensure transfers within Aon are covered by agreements based on the EU Commission's standard contractual clauses, or other similar mechanisms under applicable local law, which contractually oblige each member to ensure that personal information receives an adequate and consistent level of protection wherever it resides within;
- where we transfer your personal information outside of us or to third parties who help provide our products and services, we obtain contractual commitments from them to protect your personal information. This is achieved typically through the conclusion of the EU Commission's standard contractual clauses, or other similar contractual mechanisms under applicable local law.;
- where we receive requests for information from law enforcement or regulators, we carefully validate these requests before any personal information are disclosed.

If you would like further information about whether your information will be disclosed to overseas recipients, please contact us as noted above. You also have a right to contact us for more information about the safeguards we have put in place (including a copy of relevant contractual commitments, which may be redacted for reasons of commercial confidentiality) to ensure the adequate protection of your personal information when this is transferred as mentioned above.

Do we have security measures in place to protect your information?

The security of your personal information is important to us and we have implemented reasonable physical, technical, and administrative security standards to protect personal information from loss, misuse, alteration, or destruction. We protect your personal information against unauthorised access, use, or disclosure, using security technologies and procedures, such as encryption and limited access. Only authorised individuals access your personal information, and they receive training about the importance of protecting personal information.

Our service providers and agents are contractually bound to maintain the confidentiality of personal information and may not use the information for any unauthorised purpose.

Other rights regarding your data

Data protection laws vary among countries, with some providing more protection than others. Subject to certain exemptions, and in some cases, particularly if you reside in a jurisdiction with applicable privacy laws, you have certain rights in relation to your personal information.

You can exercise your rights by contacting us. Please note that your request will be shared with our customer, who will have the ultimate responsibility for responding to the request.

Subject to legal and other permissible considerations, we will make every reasonable effort to honour your request promptly or inform you if we require further information in order to fulfil your request. We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.

Right to Access

You have the right to access personal information, and the categories thereof, which we hold about you.

Right to Rectification

You have the right to request that we correct your personal information where it is inaccurate or out of date.

Right to be Forgotten (Right to Erasure)

You have the right to request under certain circumstances to have your personal information erased. Your information can only be erased if your data is no longer necessary for the purpose for which it was collected, and we have no other legal ground for processing the data.

Right to Restrict Processing

You have the right to restrict the processing of your personal information, but only where:

- its accuracy is contested, to allow us to verify its accuracy; or
- the processing is unlawful, but you do not want it erased; or
- it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise, or defend legal claims; or
- you have exercised the right to object, and verification of overriding grounds is pending.

Right to Data Portability

You have the right to data portability, which requires us to provide personal information to you or another controller in a commonly used, machine readable format, but only where the processing of that information is based on (i) consent; or (ii) the performance of a contract to which you are a party.

Right to Object to Processing

You have the right to object the processing of your personal information at any time, but only where that processing has our legitimate interests as its legal basis. If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.

Automated Decision Making

Aon as a service provider does not employ systems based solely on automated decision-making processes and therefore does not make such decisions that have legal or similar significant effects on you. The ultimate decision as to whether you will receive a position, for example, remains with our customers.

Within our assessment services, however, Aon does offer processes to customers that streamline the application process. Aon's logic behind such automated processes is to take your assessment responses and compare these with developed research models and industry knowledge that we have developed through statistical, scientific, and psychological based expertise (generally in the form of algorithms). For example, your input into initial tests may be calculated to decide automatically whether you are suitable to move onto further tests. Customers may later decide automatically based on your final assessment results whether to move forward with your application.

For video or audio assessment modules, the customer may utilise a speech-to-text function offered by Aon which translates your given answers into text form, which are then analysed by using the same statistical, scientific, and psychological based expertise (generally in the form of algorithms) to create a rating based report for the customer. Such reports may be used by the customer to make an automated decision as to whether to move forward with your application.

Please note that Aon does not currently utilise any facial or biometric profiling technology, and therefore does not analyse your facial expressions or otherwise exploit physical attributes shown on screen during a video assessment.

If you wish to obtain human intervention in the automated decisions and/or profiling made, you wish to express your point of view, and/or you wish to contest a decision made in this context, please contact gdpr.assessment@aon.com or the customer directly.

Withdrawal of Consent

Where you have given your consent for a specific processing activity, you have the right to withdraw this consent with future effect. To withdraw your consent, please contact gdpr.assessment@aon.com or the customer directly.

Complaint

You have the right to make a complaint to your Supervisory Authority, or other relevant responsible authority/body, about our processing of your personal data.

International Transfers

As noted above, you can ask to obtain a copy of, or reference to, the safeguards under which your personal information is transferred outside of the European Union.

Discrimination : If consumers exercise their rights, businesses may not discriminate against them, such as by denying or providing a different level or quality of goods or services or charging or suggesting that a business will charge different prices or rates or impose penalties (unless doing so is reasonably related to the value received from the consumer personal information).

Disclosure of Incentives : If businesses offer any financial incentives for the collection, sale, or deletion of their personal information, consumers have the right to be notified of any financial incentives offers and their material terms, as well as the right to not be opted into such offers without prior informed opt-in consent and to be able to opt-out of such offers at any time. Businesses may not offer unjust, unreasonable, coercive, or usurious financial incentives. ***We do not offer any incentives at this time.***

Contact Us

If you have any further questions or concerns, please contact:

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Changes to this Notice

We may update this Notice from time to time. When we do, we will post the current version on this site, and we will revise the version date located at the bottom of this page.

This Notice was last updated July 2024.