AI & Profiling Privacy Policy

October 2026

This dedicated AI & Profiling Privacy Policy complements our general Privacy Notice. It provides detailed information to individuals (athletes, team members, and employees) whose personal data is processed using artificial intelligence (AI), automated models, algorithms, or profiling tools used by PeakPersonality. This policy covers profiling and AI only. For all other aspects of how we process your personal data, including the categories of data, retention, sub-processors and international transfers, please refer to our Privacy Notice.

Scope and Our Role as Data Processor

PeakPersonality is located in the Netherlands, Van Hogenhoucklaan 62, 2596 TG The Hague, and provides strengths profiles, analytical reports, and coaching services aimed at professional athletes, teams, and organisations. For these specific services, your organisation acts as the Data Controller, as they determine the purposes and means of the processing. PeakPersonality acts as the Data Processor, under the Data Processing Agreement concluded with your organisation (the "DPA").

We apply the automated processing and AI described in this policy to your data strictly on behalf of, and in accordance with the documented instructions of, your organisation.

What Constitutes "Profiling" and "AI" in Our Services?

Under the GDPR, evaluating personal characteristics constitutes profiling. Our services involve profiling because your responses to our questionnaire are used to produce a ranking of your 24 strengths, on which all our reports are built.

We use artificial intelligence (AI) for one part of this: a generative AI model writes the narrative text that accompanies your results, and the responses of our AI coach. Your ranking, and the scores and comparisons calculated from it, are not produced by AI.

Categories of Data Subject to AI Processing

The processing described in this policy uses the personal data that we process on behalf of your organisation, as described in our Privacy Notice and set out in full in Annex 1 of the DPA. To generate narrative text, the AI model receives your ranking, in full or in part depending on the text, and may also receive your gender (to use the correct pronouns), a description of your organisation (such as its sector and culture) and your team name. Your name is replaced by a placeholder before the text is generated and restored afterwards. Our system does not send your surname, age or email address. This does not cover what you type yourself: names are replaced only where our system recognises them, so a name typed without a capital letter, or the name of another person, in a message to the AI coach may be sent as typed, and other details you type, such as an email address, are sent as typed. The one exception is the podcast: the finished script, which contains your first name, is sent to be converted into audio.

AI coach (APEX Coach): When you are logged in, you can talk to our AI coach by typing or speaking. Its responses are written by the generative AI model described below and can also be read aloud. To respond, the coach uses your message and the conversation so far, your ranking with the guidance for your strengths, your current goal and recurring patterns across your goals, your action items, session cards and

recent activity, a description of your organisation, and an extract of the coaching text from your reports. Spoken messages are converted to text by the speech recognition of your phone or browser before they reach us; depending on your device and settings, this may take place on servers of Apple, Google or your browser's provider. We receive only the text, never the audio. Your conversations, sessions, session cards, goals, reflections and action items are stored on our platform and are retained and deleted in the same way as your other data, as set out in Annex 1 of the DPA.

The Logic Involved in Our Automated Models

To ensure transparency under the GDPR, the underlying logic of our automated and AI processing consists of the following phases:

- Scoring: Your responses to the questionnaire are scored by an external provider of an established, validated character strengths survey, which produces a ranking of your 24 strengths, from 1 to 24. The provider is located outside the European Economic Area. It receives a random identifier, a language code and your answer numbers. It does not receive your name, email address or gender, and holds no means of linking your responses to you.
- Rule-based Analysis: Scores, comparisons and orderings are calculated from your ranking using fixed rules defined by PeakPersonality. The same ranking always produces the same result. Your results are not compared against norm groups. The only exception is Chemistry, the comparison between two people, where each ranking is first corrected for an average position per strength. That average was calculated once from the rankings of a group of participants and contains no data about any individual.
- AI-generated Text: The narrative text accompanying your results, such as descriptions, coaching guidance, the script and audio of your podcast, and the responses of our AI coach, is written by a generative AI model (Google Gemini). It works from your ranking, the information described above, and interpretative guidance developed by PeakPersonality. This text is not deterministic: it may be worded differently each time it is generated. It interprets your ranking but does not change it.
- Report Generation: Your dashboard and reports combine the rule-based results and the AI-generated text into structured individual and team insights.

Significance and Envisaged Consequences for Data Subjects

The analytical reports and profiling insights produced by our services are designed to help improve the individual performance of athletes or employees, as well as the overall dynamics of the team or organisation.

Crucial Information Regarding Decision-Making:

- No Solely Automated Decisions by PeakPersonality: PeakPersonality's services only generate analytical reports and recommendations. Our systems do not make final, legally binding, or significant decisions about you.
- The Controller's Responsibility: The generated reports are provided to your organisation (the Data Controller), which decides how to use them within its own processes. Your organisation is responsible, as agreed in the DPA, for ensuring that no decision producing legal or similarly significant effects for you, such as a decision affecting your career, employment, or contractual status, is based solely on these outputs.

Your Rights Regarding Automated Processing

In addition to your general privacy rights (as detailed in our general Privacy Notice), you have specific rights concerning profiling and automated processing:

- Right to Information: The right to obtain clear information about the logic involved in producing your strengths profile and its intended purpose.
- Right to Object to Profiling: You have the right to object to profiling based on your organisation's legitimate interests.
- Right to Human Intervention: If a decision producing legal or similarly significant effects for you were nevertheless based solely on automated processing, you have the right to obtain human intervention from your organisation, to express your point of view, and to contest the decision. PeakPersonality will assist your organisation in responding to your request, as agreed in the DPA.

Because your organisation is the Data Controller, you must direct all privacy and automated processing requests to your organisation.

Sub-processors and Transfers

The sub-processors we use, where they process data, and the safeguards for any transfer outside the European Economic Area (EEA) are described in our Privacy Notice and set out in Annex 2 of the DPA.

For any inquiries, please contact your organisation directly, or reach out to us at info@peakpersonality.com, and we will forward your request to the responsible contact person at your organisation. You also retain the right to lodge a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens).