

DiGiN DEI Capacity Assessment Tool: Data Protection Notice

The DEI Capacity Assessment tool is built around key “Impact Drivers” for institutional change enabling organisations to assess their strengths and identify areas for improvement in embedding DEI mainstreaming practices effectively. Designed as a developmental self-assessment framework, it helps institutions to identify strengths and areas for improvement across a series of key “Impact Drivers”. You can preview the full list of Impact Drivers and indicators [here](#). After completing the self-assessment, your institution will receive an automatically generated feedback report, including narrative reflections to support strategic planning and internal dialogue.

This Data Protection Notice explains how personal data is collected and processed when you use the DEI Assessment Tool. It is provided in accordance with the General Data Protection Regulation (GDPR – Regulation (EU) 2016/679).

In this document, the term “institution” refers to the legal entity that is the object of this assessment and for which information is entered in the tool.

1. Identity of data controller and contact details

The data controller is Yellow Window (YW), with its registered office at Mechelsesteenweg 64 (bus 701), 2018 Antwerp, Belgium.

Yellow Window (YW)

E-mail: mail@yellowwindow.com

Phone: +32/3/203.53.00

Data protection officer: Yellow Window is not legally obliged to have a Data protection officer. For questions you may contact Yellow Window’s Research Director via the above-mentioned e-mail address.

2. Categories of data collected

- **Personal data:** name and e-mail address. This data is used only for communication and administrative purposes - specifically to send your feedback report or to inform you of any changes in the Terms of Use of the tool.
- **Institutional data:** information about your organisation’s structures, policies, and practices regarding DEI. Each respondent is therefore responsible for ensuring



that it is authorised to use institutional information for completing the assessment.

The tool does not collect sensitive personal data (special categories under GDPR Article 9).

You are the source of personal data by providing the information requested by the tool.

3. Purpose of processing

Personal and institutional data are processed for the following purposes:

- To generate an automated feedback report for your institution and display benchmarking comparisons (not available yet).
- To communicate with you regarding the tool and its outputs.
- To allow your institution to track its progress over time if you repeat the assessment.
- To include anonymised institutional data in aggregate datasets for research, policy support and analysis, and academic outputs. (If you consent)
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4. Legal basis for processing

Processing is based on consent (**GDPR Article 6(1)(a)**):

- Your personal consent for your name and e-mail address, and
- By using the Tool, it is assumed that you are authorised to share information on your institution's structures, policies, and practices regarding DEI.



5. Recipients of Data

Yellow Window (owner of the software licence) acts as data processor (Article 28 GDPR) and is also required to respect the security of your personal data and to treat it in accordance with the law.

It is important to note that:

- Only authorised personnel of Yellow Window will access the raw data.
- No personal or institutional data will be shared with third parties in identifiable form.
- Only anonymised and aggregated outputs may be used for reporting, research, or academic purposes.

6. Data storage and transfers

The self-assessment tool is using the software Brilliant Assessments™, with a license held by Yellow Window. All data is held in Amazon Web Services' data center in Central Canada. Canada was chosen to leverage that country's Privacy Laws and to be compliant with EU and UK GDPR requirements. Brilliant Assessments performs additional data backups daily which are transferred to another AWS site in Ireland, fully encrypted. For detailed information, see [here](#) on the website of Brilliant Assessments.

7. Data subjects and your rights under GDPR (Articles 12–23)

The data subjects affected by the data processing detailed in this Data Protection Notice are the individuals that complete the assessment and provide information on their institution's policies on DEI. When referring to “you” in the present Protection Notice, these same individuals are addressed..

As a data subject, you have the right to:

- Access your data (**Article 15**)
- Correct inaccurate or incomplete data (**Article 16**)
- Request erasure of your data (“right to be forgotten”) (**Article 17**)
- Restrict processing in certain cases (**Article 18**)
- Withdraw your consent at any time without detriment (**Article 7(3)**)
- Lodge a complaint with a Data Protection Authority (**Article 77**)

To exercise any of these rights, you can as a first step contact the data controller directly, who will explain everything necessary and help you with your requests.

We will make every effort to fulfill your request to the extent provided by law and will respond in writing within three working days of receiving your request.

The Supervisory authorities are:



Belgium: [Data Protection Authority](#) – contact@apd-gba.be

In addition to the legal remedy, you have the right to apply to the court against the activities of the Data Controller.

8. Automated decision-making

The tool does not use personal data for automated decision-making or profiling within the meaning of GDPR Article 22.

9. Retention times

All data provided through the DiGiN DEI Assessment Tool will be stored for eight (8) years from the date of submission.

10. Ethical and legal compliance

The legal framework for the processing of personal data in this case is Regulation (EU) 2016/679 of the European Parliament and of the Council, on the protection of natural persons in connection with the processing of personal data and on the free movement of such data and on the repeal of Directive 95/46/EC (General Regulation on protection of personal data), and the follow-up Act No. 110/2019 Coll., on the processing of personal data.

