



Processing rules of the platform Cryfe™

1. Designations

The following designations are used in the responses in this document :

- **System:** Algorithmic solutions that process filmed interviews automatically (machine learning and business rules for the designation of indices) to extract the analyses.
- **User:** Person (Coach, HRD, Recruiter...) using the solution via a secured access (**account**) and for whom the system will provide interview analysis (**analyses**) - This is the interviewer
- **Interlocutor:** Person filmed during an interview and on whom the video processing by the system (analysis of visual and audio signals) will essentially rely - This is the interviewee, the coaches, etc.
- **Administrator:** Person (CEO CM Profiling; CTO CM Profiling with access to the solution's back office with rights to read and edit information from the platform (list of users, interviews, etc.).
- **MVP (Minimum Viable Product) :** This is a version of the product with just enough features to satisfy the first customers in order to provide feedback on the future development of the product.
- **Interview :** Refers to any communication whether interpersonal or intrapersonal (in the case of preparation for example), interview.

2. Name and address of the person in charge

Caroline Matteucci, CM Profiling Sàrl, Haldenweg 56, 3074 Muri b. BERN

3. Name and of the platform

CRYFE

4. Purpose of the platform and processing (file)

Provision of a solution dealing with any form of interpersonal communication, through job interviews, interviews or preparation in body impact to allow the analysis of different audio and visual signals (voice, gestures, comfort, pacifying, discomfort ...) in order to provide the necessary clues to assess the congruence / incongruence.

The file processed at the input of the solution is a video stream, thus including data from the user and the interlocutor (visual and audio of the filmed interview).

5. Starting situation

CRYFE™ SAAS, software as a service:

The objective of the system is to provide a tool to accompany and support users during interviews for congruence analysis, i.e. the positive relationship between what I think, say and do and its opposite, incongruence. To do this, the tool automatically reads audio and visual signals to track key behavioral cues. This allows the user to be supported in the behavioral reading of his interlocutor because he can

go back over each signal read and analyzed by the algorithms. The user can therefore see the moments of congruence (impact) of his interlocutor, identify the different emotions felt (visual and audio) or even return to gestures of comfort, peacemakers or discomfort.

Uploading a video of an interview is necessary at first (MVP), in the end it will be a question of processing the video stream of the interview in real time.

Initially (MVP), the tool is reserved for users (Coach, HRD, Recruiter...) via a secure access to the platform. The interlocutors do not have a user account allowing them to access the tool.

In the end, if the MVP is successful, it is planned that the interlocutors can also access the platform with a secure access by creating themselves an account.

The solution will be available in different countries (outside Switzerland and Europe).

6. Categories of personal data processed

Intimate sphere, personal characteristics, identity, e-mail address, voice, image, gestures

For the user :

- Personal information related to the user account
 - E-mail address
 - Last name / First name
 - Payment and subscription information
 - Invoice addresses
 - Type/Subscription Plan

Please note that information relating to bank details (card number, cryptogram ...) are not stored on the servers of the platform.

- Voice (conversations during the interview)
- Image (potentially during the interview)

For the interlocutor :

- Voice (conversations during the interview)
- Image (postures and gestures during the interview)
- E-mail address (entered by the recruiter to enable the raw video - without the analysis CRYFE™ - to be communicated to the interlocutor if he or she so wishes)

At terms (for the interlocutors) :

- Personal information related to the user account
 - E-mail address
 - Last name / First name

7. Categories of data recipients

The data - filmed and audio interviews, without system analysis - can be handed over to the caller on request. The analyzed data is intended for the users.

The recipients of the data are the only members of the platform CRYFE™ (User, Admin, Developers).

8. Categories of participants in the file

No mutation of the source video files is envisaged.

The user of CRYFE™ can enter personal notes in the interpersonal communication analysis stream, in this case metadata (not mutating the original video).

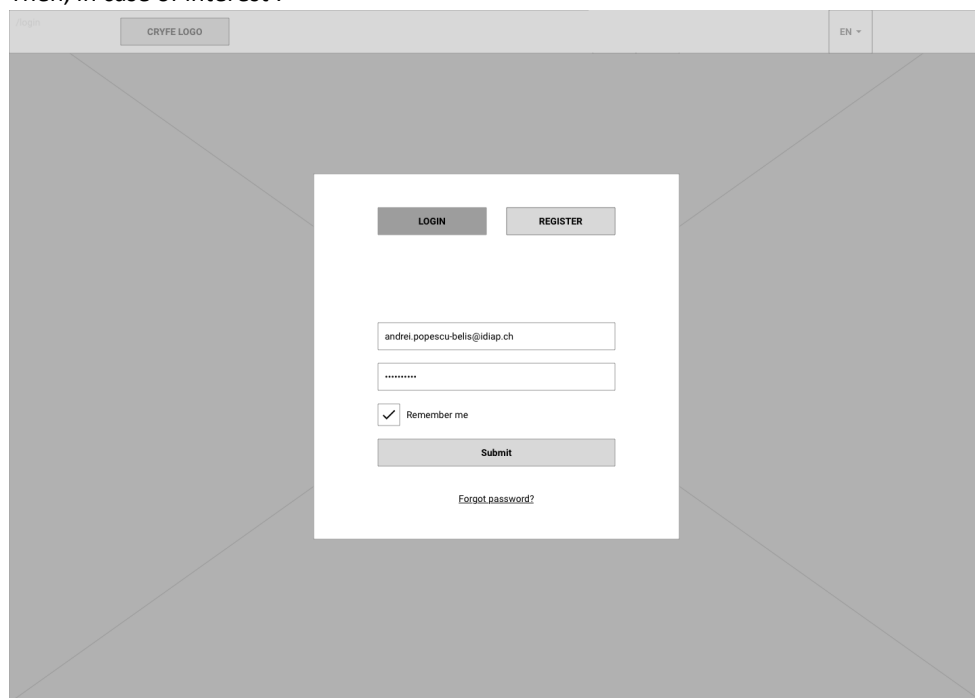
It is envisaged that some videos may be used by a person from the CM Profiling company for annotation purposes (manual association of such signals at a time T of a video) to perform the system (improvement of learning machine models to better detect the signals automatically afterwards). In this scenario, the solution provides that the agreement to "Share your video and the resulting analysis for the purpose of system improvement" is explicitly given by the interlocutor.

9. Description of the interfaces

Main Scenario Screens

Before the sign to account, the customer, future user, must fill in his email address and he has access to a demo of the platform.

Then, in case of interest :

The screenshot shows a web interface for the CRYFE platform. At the top, there is a header bar with the CRYFE logo on the left and a language selector set to 'EN' on the right. The main content area has a light gray background with a large, faint watermark of a stylized 'X' or 'E' shape. In the center, there is a white rectangular box containing the login and registration forms. At the top of this box are two buttons: 'LOGIN' and 'REGISTER'. Below these are two input fields: the first contains the email address 'andrei.popescu-belis@idiap.ch' and the second is a password field with masked characters. Below the password field is a checkbox labeled 'Remember me' which is checked. At the bottom of the form box is a 'Submit' button and a link that says 'Forgot password?'.

CRYFE LOGO

EN

LOGIN REGISTER

andrei.popescu-belis@idiap.ch

☒ Remember me

Submit

[Forgot password?](#)

Login

User email required

User password required

Terms
(Only at first launch)

CRYFE LOGO

EN

Terms of Service

Service agreement

Last modified April 14, 2020

Welcome to CRYFE!
Thanks for using our products and services ("Services"). Lorem ipsum dolor sit amet, consectetur adipiscing elit. Praesent a feugiat tellus. Aenean lacinia lacinia dolor a dapibus. Donec nibh lorem, sodales vitae leo sed, blandit euismod ligula. Morbi euismod felis viverra neque laoreet tempor. Sed ultricies, arcu quis luctus accumsan, risus nisi tempor ligula, varius tincidunt urna purus sit amet quam.
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Using our Services

☐ I agree the CRYFE Terms of Service

Additional Terms Applicable to Data Shared with CRYFE

Last modified April 18, 2020

Section title
Thanks for using our products and services ("Services"). Lorem ipsum dolor sit amet, consectetur adipiscing elit. Praesent a feugiat tellus. Aenean lacinia lacinia dolor a dapibus. Donec nibh lorem, sodales vitae leo sed, blandit euismod ligula. Morbi euismod felis viverra neque laoreet tempor. Sed ultricies, arcu quis luctus accumsan, risus nisi tempor ligula, varius tincidunt urna purus sit amet quam.
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☐ I agree the CRYFE Data Processing Terms as required by GDPR. [Learn more](#)

You must accept the terms and conditions of the service by ticking the different checkboxes to be able to continue.

I Accept

T&C of the platform

Presentations at the first connection

CRYFE LOGO

?

EN

Andrei POPESCU-BELIS
andrei.popescu-belis@idiap.ch

4

Remaining interviews

from your 'ABC' membership plan - [Upgrade plan](#)

284

Total analyzed signals

revealing 70 moments of comfort and discomfort

Ressource center

A central place for documentation, articles and tips

Request an expert

Need direct support from a profiling expert?

+

Add a new interview

My interviews

Search interviews by name or associated tags

Interview date ↓	Name	Duration	Internal reference	Status
<div><div></div><div>Upload at 07/16/2020 - 10:01</div></div>	C.G. First Meeting	00:22:09	IDI87963	<div><div></div>Processing</div> Less than 30 minutes remaining
<div><div></div><div>Upload at 07/15/2020 - 13:14</div></div>	VP Third Interview	00:15:43	-	<div><div></div>Ready</div>
<div><div></div><div>Upload at 07/15/2020 - 10:32</div></div>	L.S. Managing Director	01:02:08	IDI86931	<div><div></div>Error</div>
<div><div></div><div>Upload at 07/15/2020 - 09:58</div></div>	A0016578_CANON.mp4	00:15:13	-	<div><div></div>Ready</div>
<div><div></div><div>Upload at 07/14/2020 - 10:57</div></div>	N.N. selection interview	00:16:55	IDI89634	<div><div></div>Ready</div>
<div><div></div><div>Upload at 07/14/2020 - 10:32</div></div>	F.B. Interview	00:15:13	IDI86903, Tag 2, Tag 3	<div><div></div>Ready</div>

Dashboard

Consultation and access to the list of interviews already uploaded on CRYFE™.

Interview analysis agreements

Service policies and conditions.
Lorem ipsum description.

Candidate email

Please indicate the email of the candidate presented during the interview, he will automatically receive a link allowing him to download the raw video (without CRYFE analysis) and a copy of the attestation document signed during the interview.

Legal Notice & Terms of Use *

Last modified April 14, 2020

Data analysis conditions

Thanks for using our products and services ("Services"). Lorem ipsum dolor sit amet, consectetur adipiscing elit. Praesent a feugiat tellus. Aenean lacinia lacinia dolor a dapibus. Donec nibh lorem, sodales vitae leo sed, blandit euismod ligula. Morbi euismod felis viverra neque laoreet tempor. Sed ultricies, arcu quis luctus accumsan, risus nisi tempor ligula, varius tincidunt urna purus sit amet quam.

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Using our Services

- ☐ I acknowledge the interview processing
- ☐ I agree to the sharing and processing of data for scientific and analytics purposes

I Accept

Adding a new interview (Step 1)

Acceptance of T&C

Filling in the interlocutor's email address (in order to send him the raw video of his interview) - Within the framework of the MVP, this feature could also be managed manually.

Upload a new interview

Start by uploading the video file of your interview.
Lorem ipsum description.

Video file *

Drop your file here

or [Choose File](#)

Supported formats: .mp4, .mov, .mpeg, .avi – including ffmpeg encoding. [See our documentation for more informations](#)

Previous

Next

Adding a new maintenance (Step 2)

Upload the interview video

Configure interview analysis

Fill in some information about your interview.
Lorem ipsum description.



Interview language

English (US)English (UK)German (DE)French (FR)Italian (IT)

Interview friendly name

A0068937_CANON.mp4

It is recommended to use a meaningful name for the interview (ex. ALP First interview)

Interview date

07/14/2020

Internal reference

Previous

Validate



- Adding a new interview (Step 3)**
- Maintenance setup and information
- Name of interview (appearing on CRYFE™) optional
- Optional Schedule date
- Optional internal references (Free field allowing the user to add labels to the Schedule)

CRYFE LOGO
EN
Andrei POPESCU-BELIS
andrei.popescu-belis@idiap.ch

F.B. Interview
Ready

07/14/2020 – 10:32
English (US)
Internal ref.: IDI86903, Tag 2, Tag 3

123
Analyzed signals

6 moments of comfort and discomfort detected

Share
Edit
Download report

Add a note at 02:59
The candidate seems disturbed about th

Note type
Add note

Keyboard shortcuts

10 Incongruences
14 Emotions
Filter signals

05:08
Incongruence
Energy Low
Negative emotion (Disgust)

05:09
Energy
Low

05:09
Expression
Disgusted

05:15
Transcription
Neutral

05:24
Energy
High

05:33
Pitch
Low

05:34
Transcription
Positive

05:49
Congruence
Movement head No
Negative emotion (Anger)

05:49
Gesture

Interview consultation

After processing by the CRYFE™ system, the user can review the interview and consult the system analysis.

Where does the data come from ?

Video source of an interview filmed and uploaded into the solution by a user

Who receives the data ?

Only a user will be able to access the video interviews and analysis associated with their MVP account. Later, we plan to allow multiple account management for a company (project management tools with account allocation and sharing of the different interviews and analyses).

For what purpose is the data communicated ?

They are communicated to the user in order to support the behavioral analysis of the interview he has filmed and carried out with his interlocutor. Or to go back over the key points of the interview in order to understand the reality of the interviewer and thus avoid cognitive bias.

Eventually, the interviewee, the interviewer, may be offered access to the interviewee as part of the learning about himself or herself. Example: during an outplacement coaching the coach can film his client and then they watch the video analyzed by CRYFE™ together.

Also, depending on the policy/positioning of an HR company, the interview could be reviewed with the interlocutor.

What data is communicated ?

The video and the analyses resulting from its processing by the system (signal detection and behavioral cues) are communicated to the user.

The video is transmitted to the interlocutor if he provides his e-mail address.

How often is data reported ?

In case the video is uploaded (current scenario in delayed time) the analysis data is communicated after the system has completed processing only once. However, the user can review this data during the period set by the system CRYFE™ (12 months).

Eventually, if the interview is filmed directly (real-time scenario) the analysis data will be communicated live or with a short latency and only once.

However, the user may decide, by informing his interlocutor, to film the interview and also proceed with its analysis in delayed time.

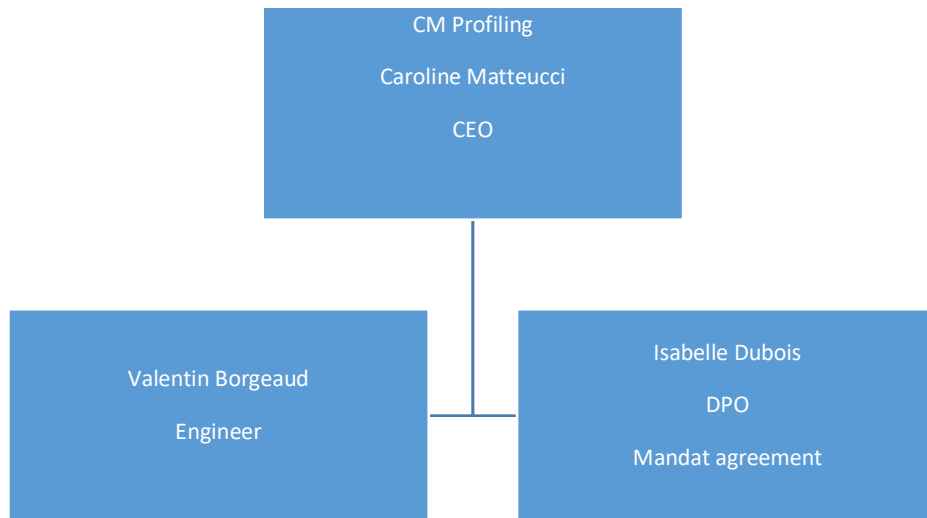
Who initiates the communication ?

The user by creating a new 'interview' in the solution CRYFE™.

By means of which medium (media) is the data communicated ?

The data recorded during the interview can be recorded via any support with a camera and microphone (refer to the setting). They are communicated via the secure web platform.

10.Organizational Chart and Responsibilities

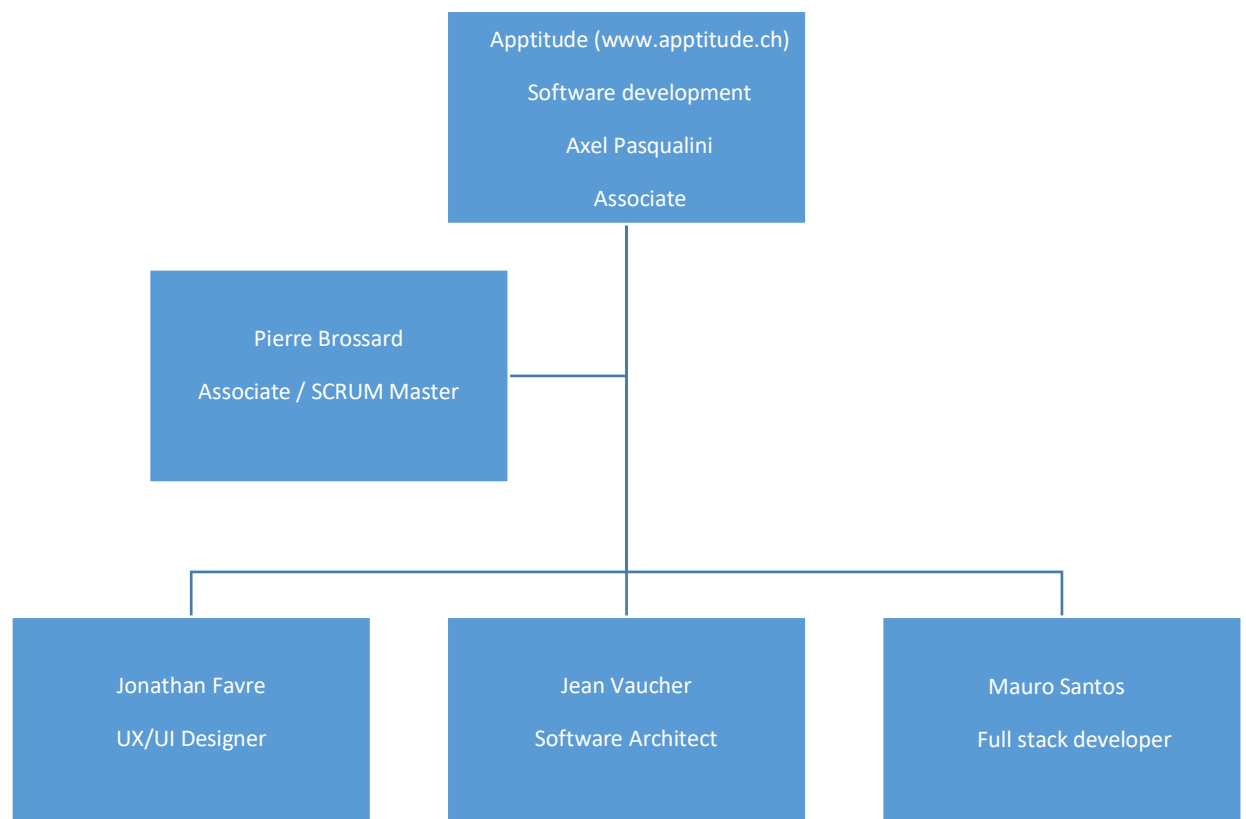


Website :

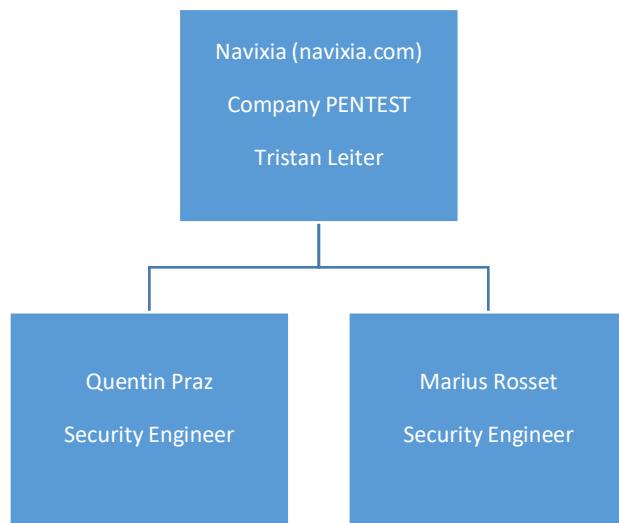
CM Profiling & CRYFE™

Webmaster Lucas Georges & Jonathan Juste <https://pixelpirate.fr/lab> & <https://www.behance.net/LucasGeorges>

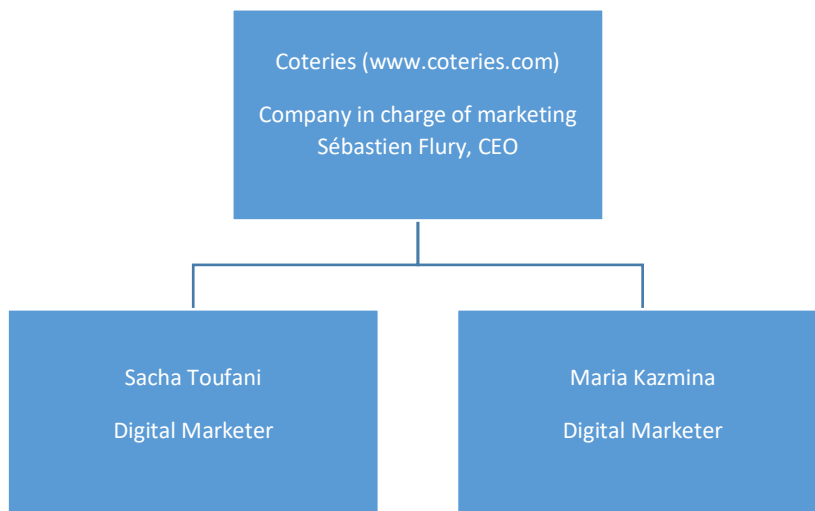
Development of the platform :



Company in charge of PENTEST :



Company in charge of marketing :



11. File of the planning documentation, realization and exploitation of the file

It is planned that the videos and analyses of an interview will be automatically erased from the platform after a given period of time (12 months).

It is left to the choice of the user to be able to delete an interview manually (video and analysis) from the online platform.

12. Reporting the file to the PFPDT : made in September 2020, see appendix at the end of the document.

13. Processus

The data acquisition and processing process is the one developed through the screens of question 9 (Description of interfaces).

A destruction of the user's data (video and system analysis) is automatically scheduled after a given period (12 months). The user can also perform this operation manually (delete an interview) within the platform for a given interview (which will delete the video and its analyses).

14. Person(s) responsible for data protection and security

Caroline Matteucci : CEO CM Profiling / CRYFE™

Isabelle Dubois, AD HOC RESOLUTION : DPO

Apptitude : developing the CRYFE™ platform, Axel Pasqualini, associate & director

Navixia : a company specialized in IT security, will intervene on the project concerning its security aspects (implementation of good practices in terms of security, slopes/audit of the developed solution). Tristan Leiter, project manager Cryfe™

15. The source of the data

They come from the interview between a user and his interlocutor filmed during the interview.

In delayed time: our client (the user) downloads the interview he filmed on the platform CRYFE™.

In real time: the data will be directly processed by CRYFE™.

16. Purposes for which data are regularly communicated

Our customers will also have video support allowing them to learn the VIP© (validation of perceived incongruities) in order to come back to the analyzed incongruities, in delayed time, during the next interview with their interlocutor. But also to come back directly on the perceived incongruities when CRYFE™ will be available in real time.

In the case where the agreement is made by an interlocutor to "Share his interview and analyses for the purpose of improving the system" the aim is for CRYFE™ / the person in charge of the annotations (CM Profiling) to perform the system by annotating various interview videos.

17. Control procedures and in particular the technical and organizational measures referred to in Art. 20 LDP

Management of Access Rights

Access rights management is administered by a person from the CRYFE™ team with an administrator role (CEO, CTO). Access to information is segmented by user (client). He will only have access to the content he has uploaded himself. CRYFE™ team members with an administrator role can have access to all data collected on the platform.

Crypting

The data is encrypted end-to-end via SSL (private/public key system). The data is automatically encrypted before being written to the disks of the server where it is hosted

summary of security features and encryption of the processing/hosting solution (Google Cloud Platform)

- Google uses multiple layers of encryption to protect customer data at rest in Google Cloud products.
- Google Cloud automatically encrypts customer content stored at rest using one or more methods.
- Stored data is broken into fragments, each of which is encrypted with a unique encryption key. The encryption keys are stored with the data, and encrypted (or "encapsulated") using key encryption keys. These are stored and used exclusively in Google's central key management service, which is redundant and distributed globally.
- All data stored in the Google Cloud Platform is encrypted at the storage space level using the AES256 algorithm, with the exception of a small number of persistent disks created before 2015 that use the AES128 algorithm.
- Google uses Tink, a common cryptography library that includes the BoringCrypto FIPS 140-2 certified module, to implement encryption consistently across virtually all Google Cloud products. The consistent use of a common library means that a small team of encryption specialists can adequately implement and manage this tightly controlled and revised code.

Authentication

Within the framework of MVP, **no strong** authentication system is implemented.

Eventually, this type of multi-factor authentication system (2FA) could be implemented to complete the security related to the access to the online platform.

18. Description of the data fields and the organizational units that have access to them

For the user :

- Personal information related to the user account
 - E-mail address
 - Last name / First name
 - Payment and subscription information
 - Billing addresses
 - Type/Subscription Plan
- Voice (conversations during the interview)
- Image (potentially during the interview)

For the interlocutor :

- Voice (conversations during the interview)
- Image (postures and gestures during the interview)
- E-mail address (entered by the recruiter to enable the raw video - without the CRYFE™ analyses - to be communicated to the interlocutor)

At terms (for the interlocutors):

- Personal information related to her account
 - E-mail address
 - Last name / First name

19. Nature and extent of user access to the file

The nature of access to files (videos) and data is consultative (the user consults his own interviews and analyses proposed by the system through the platform).

Access to the files (videos) and data is limited to the user through secure access to the platform.

20. Data processing procedures, in particular procedures for correction, blocking, anonymization (pseudonymization), saving, retention, archiving or destruction of data

It is planned that the videos and analyses of an interview will be automatically deleted from the platform after a given period of time (12 months). It is left to the choice of a user to be able to delete an interview manually (video and analysis) on the platform.

Videos are saved for a given period of time (12 months) to allow :

- they are processed by the system
- Their reading with the analyses resulting from the treatment by the user

In the MVP, the consultation of the videos and their analyses is only accessible to a given user (user who has uploaded the video on CRYFE™) and is not shared between several users.

Subsequently, user accounts for companies may be created. An administrator would thus manage the users of his company and access to the videos and analyses could be shared between users. In this case, the present rules will be adapted.

A user refusing the "Terms and Conditions" exposed during his first connection to the platform will not be able to access the tool and therefore will not be able to benefit from its services.

It is envisaged that certain videos may be used by a person from the CM Profiling company for annotation purposes (manual association of such signals at a time T of a video) to perform the system (improvement of learning machine models to better detect signals automatically thereafter). In this scenario, the solution provides that the agreement to "Share your video and the resulting analysis for the purpose of system improvement" is explicitly given by the interlocutor.

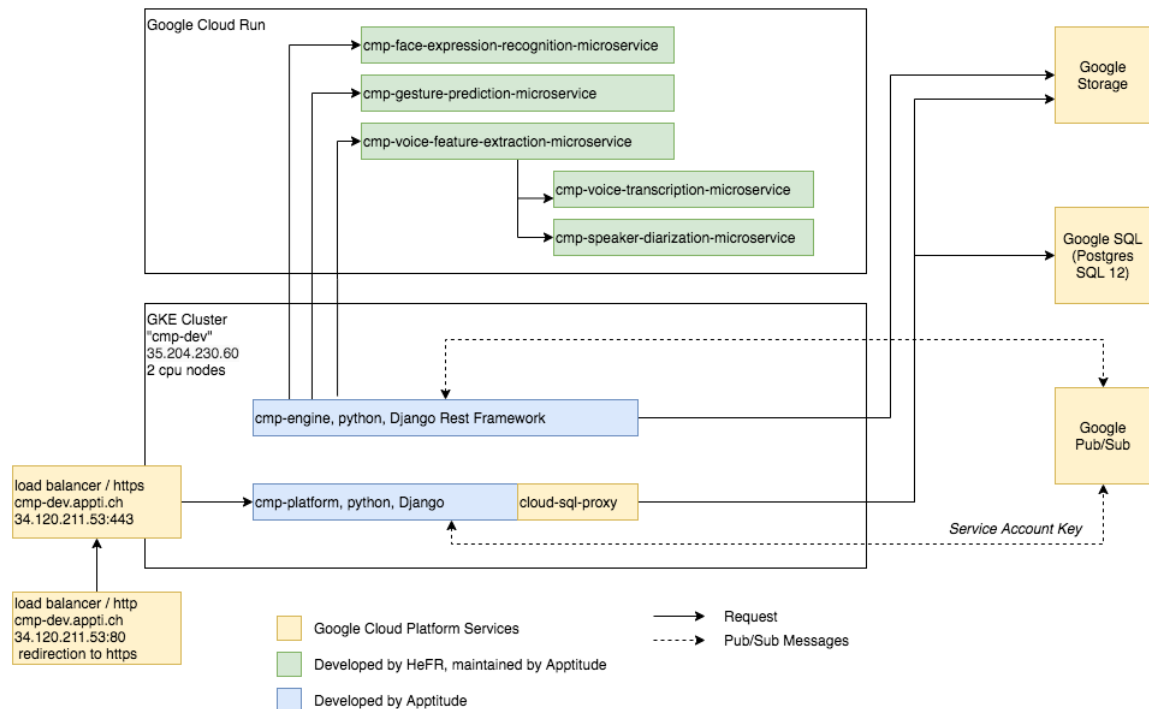
An interviewee who wants his interview data to be used to perform the system will give his explicit agreement when uploading the video to the platform (additional checkbox during the agreement stage when adding a video).

The intended use of the videos is to be able to annotate them in order to 'Perform the system.' By this we mean the use of third-party software (not integrated into the online platform CRYFE™) allowing to manually add behavioral indications to the agreed videos (e.g. at a point T of the interview, it is indicated that the candidate nods his head horizontally). These annotations are used to enrich the existing data (datasets) to make the system more efficient and precise in its analyses (trivially to use the example above: the more precise the manual annotations the system has on a nod, the more it will be able to detect them automatically and precisely on another video).

Only a person responsible for the CM Profiling company (CEO, CTO) will be able to access the annotation tool and the videos that have been agreed upon for annotation purposes.

21.Configuration of computer resources

CMP Targeted Architecture
GCP Project : "cybernetic-day-283909"



Platform architecture diagram CRYFE™

The technical team at Cryfe™ has access to the system's back office and database. Manual data deletions can be provided at the request of the applicant or user as part of the MVP.

Eventually, and depending on the growth of the system (number of users and data processed), automated and batch processing logic may be implemented to meet the need for data deletion.

22.Procedure for exercising the right of access

The user can access the files (and resulting system analyses) directly on the platform through his account. The purpose of the use of these data is explained to him each time he creates a "new interview" on the platform ("interview agreement" stage).

It is planned that the videos and analyses of an interview will be automatically deleted from the platform after a given period of time (30 to 45 days). After this period, the data will be destroyed and will no longer be accessible to the user.

A request for access to one's personal data can be made by any person concerned with the DPO, Isabelle Dubois, who centralizes the requests and ensures their follow-up, via the email address: dpo@cmp profiling.ch.

Annexe :

Caroline Matteucci
CM Profiling Sàrl
Haldenweg 56
3074 Muri b. BERN

Préposé fédéral à la protection des données
et à la transparence
Feldeggweg 1
CH-3003 Berne

Bern, le 22 septembre 2020

Concerne : désignation d'un conseiller à la protection des données (DPO)

Monsieur le Préposé fédéral,

Notre société, inscrite au Registre du commerce, a pour but de fournir toutes prestations en matière de profiling (c'est-à-dire la lecture, l'analyse comportementale ainsi qu'établissement de profil de personnalité), notamment expertises, consulting, coaching, formations continues et spécialisées, création d'une académie, support psychologique, communication interpersonnelle, accompagnement de l'individu et des sociétés (instituts) dans les domaines du management, leadership, ressources humaines, assurances, juridiques, légal, médical, social (domaine du business) et du domaine politique, policier, sécurité, sûreté (domaine de la sécurité), ainsi que développement, réalisation, conception et vente de logiciels en relation avec le profiling.

Consciente des enjeux en matière de protection des données personnelles, notre société a désigné un Conseiller en protection des données personnelles en entreprise, en la personne de Madame Isabelle Dubois, AD HOC RESOLUTION, avenue du Général Guisan 46, 1800 VEVEY (contact : [id@adhocresolution.ch](mailto:isabelle.dubois@adhocresolution.ch)) avec effet immédiat.

Nous vous remercions d'en prendre bonne note.

Veillez recevoir, Monsieur le Préposé fédéral, nos salutations distinguées.

Pour CM Profiling Sàrl

Caroline Matteucci

Cc : Mme Isabelle Dubois