

Privacy Policy

This privacy notice aims to give you information on how HealthyHR (“HealthyHR,” “Company,” “we,” “us,” or “our”) collects and processes your personal data through your use of this website, including any data you may provide through this website when you contact us about our services. This privacy notice also outlines how we may use information that we obtain about you when you;

- I. do business with us as a client of HealthyHR, as adviser to our clients, supplier or other contact or as the officer, employee or other person related to such entities; or
- II. when we receive your personal data from a third party who has your express consent from you to pass your data to us.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

1. Important Information

Controller

HealthyHR is the controller of your data and we are responsible for your personal data.

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

Contact details

Our full details are:

Full name of legal entity: HealthyHR Consultancy Ltd.

Email address: HELLO@HEALTHYHR.CO.UK

Postal address: 50 Two Locks Road, Two Locks, Cwmbran, Torfaen, Wales, NP44 7HJ

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to your personal data and your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- I. **Identity Data** includes first name, maiden name, last name, username or similar identifier and title.
- II. **Contact Data** includes your business address, email address and telephone numbers.
- III. **Transaction Data** includes details about payments to and from you and other details of services you have purchased from us.

- IV. **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- V. **Usage Data** includes information about how you use our website and services.
- VI. **Marketing and Communications Data** includes information that allows us to choose how best to market specific communications to you.
- VII. **Special Categories of Personal Data** where you provide this to us in the context of your instructions or applying for a job (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data).

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel services you have with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

I. Direct interactions.

You may give us your data through our provision of services to you, your employer or the organisation you represent, during the course of dealings with you for or on behalf of a client,

and by filling in forms or by corresponding with us by website, post, phone, email or otherwise. This includes personal data you provide when you:

- a. apply for or use our services;
- b. subscribe to our service or publications;
- c. request marketing to be sent to you; or
- d. give us some feedback.

II. *Automated technologies or interactions.*

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns.

III. *Third parties or publicly available sources.*

We may receive personal data about you from various third parties and public sources as set out below:

- IV. Technical Data from analytics providers such as Google based outside the EU.
- V. Identity and Contact Data from publicly available sources such as Experian, Companies House and the Electoral Register based inside the EU.

4. How we use your personal data

We use your information for a variety of business purposes, including to:

✓ **Fulfil our contract with you and provide you with our services, such as:**

- Providing access to certain areas, functionalities, and features of our website;
- Communicating with you about activities on our website and policy changes;
- Undertaking activities to verify or maintain the quality or safety of a service;
- Processing your financial information and other payment methods for products or services purchased;
- Processing transactions and applications; and

✓ **Analyse and improve our website pursuant to our legitimate interest, such as:**

- Detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity;

- Measuring interest and engagement in our website and short-term, transient use, such as contextual customization of ads;
- Undertaking research for technological development and demonstration;
- Researching and developing products, services, marketing or security procedures to improve their performance, resilience, reliability, or efficiency;
- Improving, upgrading, or enhancing our website;
- Developing new products and services;
- Ensuring internal quality control;
- Verifying your identity and preventing fraud;
- Debugging to identify and repair errors that impair existing intended functionality;
- Enforcing our terms and policies; and
- Furnishing you with customized materials about offers, products, and services that may be of interest, including new content.
- ✓ Comply with our legal obligations, for example auditing relating to interactions, transactions, and other compliance activities.
- ✓ Protect your vital interest or as may be required for the public good.

Other purposes you may consent to, are notified of, or are disclosed when you provide personal information.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

Promotional offers from us

We may use your Identity, Contact, Technical, and Usage Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased services from us or if you provided us with your details and, in each case, you have not opted out of receiving that marketing. You may also receive marketing communications

from us where we have received your data from a third party who has your consent to do so or has leased us the data on the basis of legitimate interest.

Third-party marketing

We do not pass your details to any third parties for marketing purposes.

Opting out

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase or other transactions.

Automated profiling

We may use technologies considered automated decision making or profiling. We will not make automated decisions about you that would significantly affect you, unless such a decision is necessary as part of a contract we have with you, we have your consent, or we are permitted by law to use such technology. You may escalate any concerns you have by contacting us below.

Use De-identified and Aggregated Information

We may use personal information and other data about you to create de-identified and aggregated information, such as de-identified demographic information, de-identified location information, information about the computer or device from which you access our website, or other analyses we create.

Testimonials

We may display personal testimonials of satisfied customers on our website in addition to other endorsements. With your consent we may post your testimonial along with your name. If you wish to update or delete your testimonial, you can contact us as provided at the end of this privacy policy.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may have to share your personal data with the third parties set out below for the purposes set out in Section 4 above;

- I. Service providers acting as processors based in the UK who provide services to us, including but not limited to IT,
- II. Professional advisers acting as processors or joint controllers who provide services to us.
- III. HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- IV. Third party service providers who provide services that involve data processing, translation, technology, research, banking and payment, client contact, data entry and processing, litigation support, marketing and security services and other similar services.
- V. Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

Some of our external third parties are based or send personal data outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- I. Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- II. Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. How long we retain your personal data

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. By law we have to keep basic information about our clients (including Contact, Identity, and Transaction Data) for six years after they cease being clients for regulatory purposes.

In some circumstances you can ask us to delete your data: see Request erasure below for further information. In other circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights are as stipulated below;

- I. *Rights to be informed.* You have the right to be provided with clear, transparent and easily understandable information about how we use your personal data and your rights. This is why we are providing you with the information in this Privacy Policy.
- II. *Right of access.* You have the right to obtain access to your personal data (if we are processing it) and certain other information (similar to that provided in this Privacy Policy). This is so you are aware and can check that we are using your personal data in accordance with data protection law.
- III. *Right to rectification.* You are entitled to have your personal data corrected if it is inaccurate or incomplete.
- IV. *Right to erasure.* This is also known as ‘the right to be forgotten’ and, in simple terms, enable you to request the deletion or removal of your personal data where there is no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions.
- V. *Right to restrict processing.* You have the right to ‘block’ or suppress further use of your personal data in certain circumstances. When processing is restricted, we can still store your personal data, but may not use it further.

- VI. *Right of data portability.* You have the right to obtain and reuse your personal data in a structured, commonly used and machine-readable format in certain circumstances. In addition, where certain conditions apply, you have the right to have such information transferred directly to a third party.
- VII. *Right to object to processing.* You have the right to object to us processing your personal data for our legitimate business interests or for direct marketing purposes (including in each case any related profiling).
- VIII. *Right to withdraw consent to processing.* If you have given your consent to us to process your personal data for a particular purpose (for example, direct marketing), you have the right to withdraw your consent at any time (although if you do so, it does not mean that any processing of your personal data up to that point is unlawful).
- IX. *Right to make a complaint to the data protection authorities.* You have the right to make a complaint to the Information Commissioner's Office (ICO) if you are unhappy with how we have handled your personal data or believe our processing of your personal data does not comply with data protection law.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Definition of terms

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience particularly in compliance with our agreed terms and conditions with you (in the case of clients of HealthyHR), or agreed terms of business (in the case of suppliers to HealthyHR). We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.