In accordance with the General Data Protection Regulation (GDPR), Health Assured have implemented this privacy information notice to inform you, our current and former clients, of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

This notice applies to current and former clients. We are a Data Controller of the personal data that you supply to us as a contract holder or service user.

**A) DATA PROTECTION PRINCIPLES**

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

A. processing is fair, lawful and transparent,
B. data is collected for specific, explicit, and legitimate purposes,
C. data collected is adequate, relevant and limited to what is necessary for the purposes of processing,
D. data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay,
E. data is not kept for longer than is necessary for its given purpose,
F. data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or;
G. damage by using appropriate technical or organisation measures,
H. we comply with the relevant GDPR procedures for international transferring of personal data.

**B) TYPES OF DATA HELD**

We keep several categories of personal data on and from our clients in order to carry out effective and efficient processes. We hold the data within our secure computer systems, for example, the systems that we use to provide our Employee Assistance, Occupational Health Case Management Services.

Specifically, we hold the following types of data:
A. personal details such as name, address, phone numbers, job title, email address or IP address etc. for the delivery of the service.

B. personal details in addition to the above such as date of birth, GP contact details, alcohol or substance use, work status and support networks for the delivery of counselling or occupational health services.

C. gender, marital status, race, religion, information of any disability that employees may have or other medical information that is supplied to us for the purposes of delivering the service (advice, counselling and occupational health services etc.)

C) COLLECTING YOUR DATA

Data for employee assistance services, such as counselling and advisory is provided by you to us directly when contacting the service but for in cases where a manager refers you to us. For Occupational Health services, your employer will provide us with your data in order to arrange the services and you will provide additional data during the later assessment. This data is collected for the purpose of providing the services and will then be securely retained in line with our retention policy.

Personal data is kept in files or within the Company’s IT systems.

During registration with the Health Assured app, we collect certain details such as your Name, Gender, Phone Number (if provided) and Email Address. This will enable Health Assured to administer the app.

The Health Assured app also allows users to submit additional data through the Enquiry Form or Live Chat functions. This will be sent directly to Health Assured for the purpose of administering the requested services. This data is collected for the purpose of providing the services and will then be securely stored in our CRM and retained in line with our retention policy.

To ensure functionality and user administration the organisation that provides you with access to Health Assured’s app (such as your employer) and the app developer Degree53, have access to limited app usage data. This allows them to see your registration details in order to confirm that the intended users are able to access the resource. Neither will be able to see how you have used the app or what content has been accessed.

My Healthy Advantage does not use tracking software to collect data about the users or their online actions. The information contained in the ‘Health Trackers’ feature of the app (i.e. user’s steps, sleep, weight etc.) is retrieved from Apple Health application for iOS and Google Fit for Android devices and displayed within My Healthy Advantage, on the Health Hub & Health tracker screens. Users have to give the device permission before the app can access this data from the Apple Health and Google Fit.

Other permissions required in order to access certain features are:

A. permission to send the user push notifications
B. permission to access camera, camera roll and saved pictures in order to upload a profile picture to the app
C. permission to access the camera for biometric login
Health Assured will not share your personal data with any third parties without your consent. Health Assured do, however, reserve the right to use aggregate information and statistics for the purposes of monitoring app and website usage in order to help us develop our service and may provide such anonymised aggregate information to third parties.

D) LAWFUL BASIS FOR PROCESSING

The law on data protection allows us to process your data for certain reasons only. In the main, we process your data in order to comply with a legal requirement or in order to effectively manage the service contract we have with you, including ensuring we can deliver the service to you. The information below categorises the types of data processing we undertake and the lawful basis we rely on.

<table>
<thead>
<tr>
<th>Activity requiring your data</th>
<th>Lawful basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>Set up your account</td>
<td>Performance of the contract</td>
</tr>
<tr>
<td>Carry out the delivery of the services you have on your account, including Occupational Health and Employee Assistance Services</td>
<td>Our and your legitimate interests</td>
</tr>
<tr>
<td>Ensuring payments are made under your account</td>
<td>Performance of the contract</td>
</tr>
<tr>
<td>Ensuring VAT and insurance premium tax is paid</td>
<td>Legal obligation</td>
</tr>
<tr>
<td>Carrying out checks in relation to your company status and validating the information supplied to us</td>
<td>Legal obligation</td>
</tr>
<tr>
<td>Making financial decisions in relation to entering both initial and subsequent contracts</td>
<td>Our legitimate interests</td>
</tr>
<tr>
<td>Making decisions about service delivery methods</td>
<td>Our legitimate interests</td>
</tr>
<tr>
<td>Ensuring efficient administration of contractual services to you</td>
<td>Our legitimate interests</td>
</tr>
<tr>
<td>Effectively monitoring the service provided including adherence to commitments and service entitlements</td>
<td>Our legitimate interests</td>
</tr>
<tr>
<td>Maintaining up to date records about you to ensure, amongst other things, effective correspondence can be achieved and appropriate contact points in place</td>
<td>Our legitimate interests</td>
</tr>
<tr>
<td>Dealing with legal claims made against us</td>
<td>Our legitimate interests</td>
</tr>
<tr>
<td>Preventing fraud</td>
<td>Our legitimate interests</td>
</tr>
</tbody>
</table>
Ensuring our administrative and IT systems are secure and robust against unauthorised access | Our legitimate interests

Registering with the Health Assured App | Lawful basis
| Performance of contract

**E) SPECIAL CATEGORIES OF DATA**

Special categories of data are data relating to:

A. health
B. sex life
C. sexual orientation
D. race
E. ethnic origin
F. political opinion
G. religion
H. trade union membership
I. genetic and biometric data.

We carry out processing activities using special category data for the purposes of delivering counselling and occupational health services. This data will be provided to us or requested by us for the purposes of providing our services, to ensure you receive appropriate advice and support.

Most commonly, we will process special categories of data when the following applies:

A. you have given explicit consent to the processing,
B. we must process the data in order to carry out our legal obligations,
C. we must process data for reasons of substantial public interest,
D. you have already made the data public,
E. processing is necessary for the purposes of preventive or occupational medicine, or for the assessment of the working capacity of the employee.

**F) FAILURE TO PROVIDE DATA**

Your failure to provide us with data may mean that we are unable to fulfil our requirements for entering into a contract or providing a service to you. This could include being unable to offer you services or administer existing contractual services.

**G) CRIMINAL CONVICTION DATA**

We will only collect criminal conviction data where it is appropriate to the provision of the services that you are contracted to receive. This data will usually be collected during advisory or counselling services, however, it may be collected at any time during the contract
where necessary. We use the information to form the advice and services that are provided to you. We rely on the lawful basis of legitimate interest to process this data.

H) WHO WE SHARE YOUR DATA WITH

All employees within Health Assured that handle your personal data are trained in ensuring data is processed in line with GDPR.

Your data is not shared with third parties, except for other reasons to comply with a legal obligation placed upon us or in order to provide you with the requested services. We have a data processing contract in place with such third parties to ensure data is not compromised. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

<table>
<thead>
<tr>
<th>Activity requiring your data transfer (service users)</th>
<th>Lawful basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>Delivery of Counselling Services across our network of affiliate counsellors.</td>
<td>Legitimate interest</td>
</tr>
<tr>
<td>Online counselling platforms, including video communication tools, online counselling programmes and training</td>
<td>Legitimate interest</td>
</tr>
<tr>
<td>Delivery of Occupational Health Services across our network of OH Practitioners and Partners'</td>
<td>Legitimate interest</td>
</tr>
<tr>
<td>Language translation services</td>
<td>Legitimate interest</td>
</tr>
<tr>
<td>Case Administration Software</td>
<td>Legitimate interest</td>
</tr>
<tr>
<td>Advisory, Medical and Financial Services</td>
<td>Legitimate interest</td>
</tr>
<tr>
<td>Critical Illness and Injury Support</td>
<td>Our legitimate interests</td>
</tr>
<tr>
<td>Emergency telephony overflow services</td>
<td>Our legitimate interest</td>
</tr>
<tr>
<td>Emergency services Police, Ambulance or Fire Department</td>
<td>Vital Interest</td>
</tr>
<tr>
<td>Your General Practitioner (GP) in cases of risk of harm to self</td>
<td>Legitimate interest</td>
</tr>
</tbody>
</table>

I) PROTECTING YOUR DATA

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.
J) RETENTION PERIODS

We only keep your data for as long as we need it for, which will be at least for the duration of your service contract plus 7 years from the date that service contract with us terminates, although in some cases we will keep your data for a longer period after your contract has ended. Some data retention periods are set by the law.

RetentionPolicy can vary depending on why we need your data, as set out below:

<table>
<thead>
<tr>
<th>Record</th>
<th>Recommended Retention Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>HMRC approvals</td>
<td>Permanently</td>
</tr>
<tr>
<td>Health data (Occupational Health, Health surveillance)</td>
<td>50 years</td>
</tr>
<tr>
<td>All other data</td>
<td>7 years from the date the service contract with us terminates</td>
</tr>
</tbody>
</table>

K) AUTOMATED DECISION MAKING

Automated decision making means making decision about you using no human involvement e.g. using computerised filtering equipment. No decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

L) CLIENT RIGHTS

You have the following rights in relation to the personal data we hold on you:

A. the right to be informed about the data we hold on you and what we do with it;
B. the right of access to the data we hold on you. More information on this can be requested at SAR@healthassured.co.uk or 0844 892 2493.
C. the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as ‘rectification’;
D. the right to have data deleted in certain circumstances. This is also known as ‘erasure’;
E. the right to restrict the processing of the data;
F. the right to transfer the data we hold on you to another party. This is also known as ‘portability’;
G. the right to object to the inclusion of any information;
H. the right to regulate any automated decision-making and profiling of personal data.
M) CONSENT

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data.

N) MAKING A COMPLAINT

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.

For those based in Ireland, you are able to raise a complaint with the Data Protection Commission (DPC), you can contact the DPC at Data Protection Commission, Canal House, Station Road, Portarlington, R32 AP23 Co. Laois or by email to info@dataprotection.ie.

O) DATA PROTECTION COMPLIANCE

If you have any queries or comments about this Policy, please contact us at compliance@Healthassured.co.uk

The Group Data Protection and Compliance Officer is: Fawn Beddows

Telephone 0844 892 2779

Email: GDPR@peninsula-uk.com