

Wellspace Privacy and Cookies Policy – April 2018

Arma Systems Ltd trading under Wellspace. (“Wellspace,” “we,” “us,” “our”) is committed to protecting your privacy. This Privacy and Cookies Policy (the “Privacy Policy”) explains our data practices regarding the Personal Information we collect about you in connection with our resources and services available through the website and mobile applications (the “Services”), all of which are entirely voluntary, and what steps you can take to protect that information.

Here are the topics we will cover in this Privacy Policy:

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Collection and Use of Personal Information

To enable us to provide quality services to you, we need to collect anonymous and Personal Information about you. “Personal Information” means any information concerning the personal or material circumstances of an identified or identifiable individual. We collect Personal Information through your use of the Software and related services such as the Wellspace Smartphone Applications, Wellspace Activity Tracking Devices (hardware devices distributed by Wellspace that can be connected with our services), the Biometric Tracking Kiosks (tracking stations located e.g. at your place of employment), and information you provide related to your use of the website and mobile applications (e.g. through the use of cookies).

Your Personal Information includes, but is not limited to, your:
contact Information, such as your name, address, email address, phone number provided by your employer, or which you provide when you enrol as a user of the service, upload or submit activity information or any material via the website or request any information;
email address in connection with your account sign-in facility;
gender and age when you enrol and in connection with your account profile;
information collected through the use of our software and related services about your health, fitness and related activities including technical information from your fitness device; record of your participation in activities and challenges and your rewards;

information you post in the form of comments or contributions to discussions, and communications you send us to submit queries or comments regarding the website or its content.

You are under no obligation to provide any Personal Information to us at any time. However, if you should choose to withhold specific information, we may be unable to provide you with certain services.

We will use your Personal Information only for the purpose of providing our services to you, including to: Administer your account with us; Identify you when you sign in; Track your programme progress and determine your eligibility for rewards, as well as provide you with information that you may find helpful; Analyse on an anonymous, aggregated data basis the use of the website and the people visiting in order to improve our content and services, including research into our users' demographics; and send you information that you have requested from us.

Push Notifications

We send you push notifications on your device from time to time in order to provide you with in- product reminders and notifications. If you no longer wish to receive these types of communications, you may turn them off at the device level.

Informational Emails

Wellspace may send you emails or newsletters with information and offers about the Wellspace platform and services. You can opt out of such communications free of charge at any time by sending an email to info@yourwellspace.com

Additional Information

When you visit the website we may automatically collect additional information such as the type of Internet browser or mobile device you use, your IP address (the unique address that identifies your device on the internet) and the operating system of your device, which is automatically recognised by our web server. We use this information to derive a broad, non-specific understanding of the locations from which you are accessing our services, to analyse trends, administer the site, track users' movements around the site and to gather demographic information about our user base as a whole and to personalise the website to users' preferences.

Information Sharing

In general, we will use and disclose your Personal Information to administer our services to you including, at times, disclosing your Personal Information to agents or contractors that work on our behalf and assist us in providing and supporting the services we offer through the website including processing transactions, fulfilling requests, analysing data or helping us to communicate with our members. We may also disclose your Personal Information if you have expressly consented to this.

In addition, we may use your Personal Information, in connection with your participation in our services and your possible participation in other third-party-provided wellness services ("Third- Party Providers") that may be offered to you by us, your employer or entities with which your employer contracts, for the following general purposes:

to coordinate (x) enrolment in, (y) enhancement of your experience and (z) education about the services available to you through our platform such as a Wellbeing Appraisal Report or any related wellness services provided by a Third-Party Provider, to ensure that you receive appropriate rewards for participation in our services and other similar services provided by your employer or entities that contract with your employer, to evaluate the overall quality and effectiveness of the programme(s) in which you may participate; and to assess your eligibility for other programmes that your employer or contractors on behalf of your employer, may offer.

To the extent you participate in any wellness challenges or competitions that we sponsor, please be aware that your name and performance information will be available to other wellness challenges or competition participants and to your employer if you opt in to make your data visible.

Except as described in this Privacy Policy, we will not sell, rent or make available your Personal Information to third parties without your permission. Unless in using the website or mobile applications you expressly or impliedly agree to make certain information available, all Personal Information that we collect is kept confidential to the best of our ability, subject to the other terms and conditions of this Privacy Policy. In addition, our employees and contractors who provide services related to our website or mobile applications are obliged to respect the confidentiality of any Personal Information held by us. Our employed staff and contractors are authorised to use your Personal Information only as necessary to provide these services to us.

In the event that we undergo re-organisation or are sold to a third party, any Personal Information we hold about you may be transferred to that re-organised entity or third party in accordance with applicable law. You acknowledge that such acquisitions may occur, and that any acquirer of Wellspace or its assets may continue to use your Personal Information as set forth in this Privacy Policy.

Wellspace may disclose your Personal Information (a) if legally entitled or required to do so (for example if required by law or by a court order or other judicial or administrative proceeding, (b) as otherwise required under any applicable law, rule or regulation and (c) if we believe, in good faith, that such disclosure is necessary to protect or defend our rights or those of others or to assist in the investigation or prevention of illegal activity.

The website may use message boards and messaging forums that will be available to its members. Any information that is disclosed in these areas may become public information and you should exercise caution when using these and disclosing your Personal Information.

Access upon request we will provide you with information about whether we hold any of your Personal Information. If your Personal Information changes or is incorrect or outdated, you may correct, update or amend it by making the change through the “my account” section of the website. If you no longer desire our service, please contact info@yourwellspace.com to discuss cancellation.

Anonymous Information

We may create “Anonymous Information” records from the Personal Information records by excluding your Contact Information or excluding any other information that could link the Anonymous Information back to you. We may use this Anonymous Information for internal purposes, such as analysing patterns in the programme usage, so that we may enhance the services. We reserve the right, subject to applicable law, to use and disclose any Anonymous Information at our discretion. For example, upon request by your employer, we may share Anonymous Information with other partnering organisations for purposes of research and programme analysis. You are welcome to request the names of such partnering organisations from us at any time. We use this Anonymous Information to analyse and understand demographics trends, customer behaviour patterns and desires, and information that may enrich the content and quality of our member programmes.

If you are a member of the WellSpace service we may (a) share Anonymous Information with your employer in an anonymous aggregated or group format and (b) provide your Personal Information in an anonymous aggregated or group format to third parties (“Analytics Processors”) that process that Personal Information to generate Anonymous Information and analytical information related to that Anonymous Information to be shared with your employer. Your employer will not be able to use such Anonymous Information to directly identify you. Your employer may use this Anonymous Information in its discretion, including to evaluate the programme overall as well as to provide additional benefits, programmes and services.

The Analytics Processors do not have any independent right to use your Personal Information except to provide services to generate the Anonymous Information and analyse the information to generate general analytical information. You are welcome to request the names of such Analytics Processors from us at any time.

Cookies

Technologies such as cookies, beacons, tags, scripts and other similar technologies are used by us and our service providers, technology partners or other third-party assets. These technologies are used to help administer the site, identify the total number of users, measure traffic patterns for research purposes, personalise or customise content so that a user’s preferences can be “remembered” when they return to the site and to better manage content. The website also uses cookies or similar technology to collect information about members’ access to the website.

Cookies are pieces of information that include a unique reference code that a website transfers to your device to store and sometimes track information about you. A number of cookies that the website uses last only for the duration of your session on the website and expire when you close your browser. Other cookies are used to remember you when you return to the website and will last for longer.

We use cookies to:

Remember that you have used the website before; this means we can identify the number of unique visitors we receive and manage capacity;

Allow you to navigate the website more quickly and easily;

Remember your login session as you move from one page to another within the website;

Store your settings and preferences;
Customise parts of the content of the website to reflect your targets and awards; and
Collect statistical information about how you use the website so that we can improve the website and our content.

Some of the cookies used on the website are set by us and some are set by third parties who are delivering services on our behalf. Most computer and some mobile device browsers automatically accept cookies but, if you prefer, you can change your browser to prevent that or to notify you each time a cookie is set. You can also learn more about cookies by visiting www.allaboutcookies.org, which includes useful additional information on cookies and how to block cookies using different types of browsers. Please note that by blocking or deleting cookies you may not be able to take full advantage of the website.

Mobile Analytics

We use mobile analytics software to allow us to better understand the functionality of our mobile software on your phone. This software may record information such as how often you use the application, the events that occur within the application, aggregated usage, metrics, performance data, crash reports and where the application was downloaded from. We do not link the information we store within the analytics software to any personally identifiable information you submit within the mobile application.

Links to third-party sites

The Wellspace website and mobile applications may contain links to other websites that are not owned or controlled by Wellspace. The provision of such links is for your convenience and does not signify our endorsement of such websites or their contents. We have no control over and are not responsible for the privacy policies governing such other websites or the content displayed on such other websites. If you submit Personal Information to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any website you visit.

Security

Wellspace follows reasonable physical, electronic and managerial procedures designed to safeguard and secure your Personal Information. However, no company, including Wellspace, can fully eliminate security risks associated with Personal Information. Amongst the security measures we take is a login process requiring a password and username that you select and a firewall protecting our hosting server. Wellspace will retain your username and password as part of your Personal Information, but will not share this information with anyone. Please be advised that you are responsible for keeping your password and username confidential and secure from unauthorised persons, and that you are responsible for any and all activities that occur under your member account.

It is advisable to close your browser when you have finished your session to help ensure others do not access your Personal Information if you use a shared computer or a computer in a public place.

GDPR

The new EU General Data Protection Regulation (GDPR) comes into force on 25 May 2018 (including in the UK regardless of its decision to leave the EU) and will impact every organisation which holds or processes personal data. It will introduce new responsibilities, including the need to demonstrate compliance, more stringent enforcement and substantially increased penalties than the current Data Protection Act (DPA) which it will supersede.

Wellspace is committed to high standards of information security, privacy and transparency. We place a high priority on protecting and managing data and Wellspace will comply with applicable GDPR regulations when they take effect in 2018, including as a data processor, while also working closely with our customers and partners to meet contractual obligations for our procedures, products and services. Our team of experienced business analysts, consultants and digital specialists will also help to support customers in meeting their obligations through the provision of expert services and value-adding solutions.

Data Storage

Data Centres: Our information systems infrastructure (servers, networking equipment, etc.) are located at third party ISO27001 audited data centres. We manage all of our storage and servers located in those data centres.

Environmental Controls: Our data centres are maintained at controlled temperatures and humidity ranges which are continuously monitored for variations. Smoke and fire detection and response systems are in place.

Location: All user data is stored in the UK.

Deletion of your Account

If your membership is terminated for any reason, we will delete your contact information so that we retain only Anonymous Information in our databases, unless we are obliged to store your Personal Information for legal or billing reasons.

Your rights

You have a legal right under data protection law to a copy of all the information held about you by us. On request we will provide you with a copy of this information. You also have a right to correct any errors in that information. As mentioned above, you have a right to prevent the use of your Personal Information for direct marketing purposes.

Changes to this Privacy Policy

This Privacy Policy is subject to change from time to time. We will post any revised version of the Privacy Policy on the Wellspace website. If we make material changes to it, we will also send you an email to the last email address you provided to us. Any amended Privacy Policy will be effective seven (7) calendar days after posting for existing members.

Any changes to this Privacy Policy may affect our use or disclosure of Personal Information collected prior to the changes. If you do not agree to any of the changes, you must notify us prior to the effective date of the changes that you wish to terminate your membership with us. Continued use of our Services following notice of such changes will indicate your acknowledgement and acceptance of such changes.

Contacting us

Please submit any questions, concerns or comments you have about this Privacy Policy or any requests concerning your personal data by email to info@yourwellspace.com.
Alternatively, you may contact us at:

The Privacy Officer
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Church Lane
Sheffield
S25 2RG
UK

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