

HealthBoxHR Privacy Statement

WHO WE ARE

This Privacy Policy tells you what to expect when we collect and process your personal information through your use of www.HealthBoxHR.com (the 'Site'). MyHealthBox Ltd, trading as 'HealthBoxHR', a company registered in England and Wales with Company Number 12815497 and registered office at 20-22 Wenlock Road, London, N1 7GU, UK, United Kingdom, is the controller and responsible for your personal data ('We, Us, Our').

Our Data Protection Officer is Peter Dolinaj and you can contact us at:

20-22 Wenlock Road, London, N1 7GU, UK

support@HealthBoxHR.com

+44 203 468 5770

WHAT THIS POLICY DOES NOT APPLY TO

This Privacy Policy does not apply to any data collected, processed or otherwise dealt with in accordance with the [EULA](#). The EULA applies when you use our cloud HR software solution.

WHAT THIS POLICY APPLIES TO

Where we refer to Data Protection Law below this means;

- unless and until the GDPR is no longer directly applicable in the UK, the General Data Protection Regulation ((EU) 2016/679) and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK, and then
- any successor legislation to the GDPR or the Data Protection Act 2018.

Your privacy is important to us and we will process your data in accordance with Data Protection Law. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

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.

THE KIND OF INFORMATION WE HOLD 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 will collect, store, and use the following categories of personal information about you:

- Identity Data such as first name, last name and title.
- Contact Data such as addresses, telephone numbers, and personal email addresses.
- Technical Data such as 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 this Site.
- Usage Data such as information about how you use our Site, products and services.

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 Site 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 Policy.

IF YOU FAIL TO PROVIDE PERSONAL INFORMATION

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 a product or service you have with us but we will notify you if this is the case at the time.

HOW IS YOUR PERSONAL INFORMATION IS COLLECTED?

You may give us your personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- Sign up to newsletters.
- Sign up to email updates.
- Request demos and other interactive features.
- Search our Site.
- View a blog page.

As you interact with our Site, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. Please see "USE OF COOKIES BY HEALTHBOXHR" below for further details.

We will receive Technical Data about you from various third parties as set out below:

- analytics providers such as Google based outside the EU;
- advertising networks based inside and outside the EU;

- search information providers based inside and outside the EU.

We may combine Technical Data about you from third parties with other personal data collected elsewhere on the Site.

HOW WE WILL USE INFORMATION ABOUT YOU

We will only use your personal information when the law allows us to.

To administer and protect our business and Site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) we will use your personal information where it is necessary to comply with a legal obligation or for our legitimate interests (running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise), or those of a third party, but only where your interests and fundamental rights do not override our interests.

To use data analytics to improve our Site, services, marketing, customer relationships and experiences where it is necessary to comply with a legal obligation or for our legitimate interests (to define types of customers for our products and services, to keep our Site updated and relevant, to develop our business and to inform our marketing strategy), but only where your interests and fundamental rights do not override our interests.

To make suggestions and recommendations to you about services that may be of interest to you where it is necessary for our legitimate interests (to develop our products/services and grow our business), but only where your interests and fundamental rights do not override our interests.

We may also use your personal information in the following situations, which are likely to be rare:

- where we need to protect your interests (or someone else's interests); or
- where it is needed in the public interest.

Situations in which we will use your personal information

We need all the categories of information we keep about you primarily to allow us to use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

- To provide the relevant service or feature that you have requested.
- To manage your preferences.
- To gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our newsletters and email subscriptions.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- To conduct data analytics studies to review and better understand how and when people use our Site.
- To help us to improve our Site and search functionality.
- To help us improve the blog.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

You will have the ability to unsubscribe from any repeat communications at any time.

USE OF COOKIES BY HEALTHBOXHR

Our Site uses cookies to distinguish you from other users of our Site. This helps us to provide you with a good experience when you browse our Site and allows us to improve our Site. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- Strictly necessary cookies. These are cookies that are required for the operation of our Site. They include, for example, cookies that enable you to log into secure areas of our Site, use a shopping cart or make use of e-billing services.
- Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our Site when they are using it. This helps us to improve the way our Site works, for example, by ensuring that users are finding what they are looking for easily.
- Functionality cookies. These are used to recognise you when you return to our Site. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- Targeting cookies. These cookies record your visit to our Site, the pages you have visited and the links you have followed. We will use this information to make our Site and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.aboutcookies.org or www.allaboutcookies.org. If you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or part of our Site. Our Site works best with cookies enabled.

To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>.

CHANGE OF PURPOSE

We will only use your personal information 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 we need to use your personal information 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 information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

DATA SHARING

We may have to share your data with third parties, including third-party service providers. We require third parties to respect the security of your data and to treat it in accordance with the law. We may transfer your personal information outside the EU, as set out in "Transferring information outside the EU" below. If we do, you can expect a similar degree of protection in respect of your personal information.

Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents). The following categories of third-party service providers process personal information about you for the following purposes:

- Service providers acting as processors based in the UK who provide IT, development, and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors, and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.

- 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.

How secure is my information with third-party service providers?

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

What about other third parties?

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

Transferring information outside the EU

As our customer relationship software provider is based in the United States, we have to transfer your personal data out of the EEA. As our provider is part of the Privacy Shield it is required to provide your personal data with similar protection as it would receive inside the EEA. For further details, see https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/eu-us-privacy-shield_en

DATA SECURITY

We have put in place measures to protect the security of your information. Details of these measures are available upon request. Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other

third parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality. Details of these measures may be obtained from our Data Protection Officer.

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

DURATION

We will only retain your personal information 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.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. We will retain and securely destroy your personal information in accordance with our data retention rules that are available on request.

YOUR LEGAL RIGHTS

Your duty to inform us of changes

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

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, request that we transfer a copy of your personal information to another party or withdraw consent, please contact our Data Protection Officer in writing via email to the email address set out in the "WHO ARE WE" section above.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such 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 the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

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.

GENERAL

Third parties: We contract with a number of third parties to assist us in providing our Site and services. For example, we may use third parties to develop our Site and to provide the servers on which our Site is hosted. Wherever third parties are involved in processing personal information on our behalf, we shall ensure they do so in accordance with UK Data Protection Law. Third parties are not allowed to use your personal information for their own purposes.

Business reorganisation: In addition to the above, we may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation, in which event we will take steps to ensure that your privacy rights under this Privacy Policy continue to be protected.

Financial transactions: Under no circumstances will we hold payment details such as your card number, expiry date and security code on our servers. Where payments are handled through an accredited payment bureau, you should visit their website to view their privacy policy.

Links to other websites: This Privacy Policy only covers our Site. Any other websites which may be linked to by this Site will be subject to their own privacy policy, which may differ from ours and we are not responsible for the content provided on any third party websites.

Changes to this Privacy Policy: We keep our Privacy Policy under regular review. Updates to it shall become effective when published on our Site. This Privacy Policy was last updated on 14th August 2019.

Complaints or queries: We will endeavour to provide additional information or explanation of this Privacy Policy if needed and any requests for this should be sent to the address set out in the "WHO WE ARE" section above.