

MyHealthBox / HealthBoxHR

Privacy Policy

Updated and effective as of 5 October 2021

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ABOUT US

At MyHealthBox Ltd, we are committed to respecting your privacy. This Privacy Policy explains how we collect, use and disclose personal information that we receive when you may make use of our HR platform HealthBoxHR (the “platform” and our mobile app called “MyHealthBox” (the “App”).

It is important that you read this Privacy Policy so that you are fully aware of how and why we are using your data.

The Platform and App is owned and operated by MyHealthBox Ltd a company registered in England and Wales with company number 12815497 and with its registered office at 20-22 Wenlock Road, London, England, N1 7GU (“**MyHealthBox**”, “**we**”, “**our**”, and “**us**”). MyHealthBox is registered as a data controller with the Information Commissioner’s Office under data protection registration number ZA802616.

CONTACTING US

If you have any questions about our Privacy Policy or your information, or wish to exercise any of your rights as described in this Privacy Policy or under data protection laws, you can contact our Data Protection Officer at:

By post:

FAO Data Protection Officer
MyHealthBox Limited
20-22 Wenlock Road

London N1 7GU

By email: info@healthboxhr.com .

DATA PROTECTION PRINCIPLES

We adhere to the following principles when processing your personal information as data controller:

Lawfulness, fairness and transparency: data must be processed lawfully, fairly and in a transparent manner.

Purpose limitation: data must be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

Data minimisation: data must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

Accuracy: data must be accurate and, where necessary, kept up to date.

Storage limitation: data must be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal information are processed.

Integrity and confidentiality: data must be processed in a manner that ensures appropriate security of the personal information, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage by using appropriate technical or organisational measures.

PERSONAL INFORMATION WE COLLECT

Information you give us

You may provide us with personal information, including when you:

- register to receive our services;
- use the Platform and App; and
- communicate with us (whether through the App, by email or phone).

The categories of personal information you provide include:

Contact data:

- basic ID information (such as first and last name, and address); and
- contact details (including email address).

Personal information:

- age
- passport number and national insurance number;
- photos and images;
- GP address; and
- Medical/NHS number.

Health Data:

You may also provide us with information relating to your health and wellbeing when registering for the Platform and App or using our services. This information may include:

- Vaccine proof
- Test information
- blood type;
- height, weight and BMI;
- lifestyle information (such as smoking and alcohol consumption);
- medication;
- health appointments;
- health records (such as prescriptions, records of vaccinations, medical images (such as scans, x-rays and ultra-sounds), blood tests etc);
- health and wellbeing goals; and
- diet information,

(referred to together as “**Health Data**” in this privacy policy).

If you use the MyBabyBox services available on the App, you may also provide us with certain information (including health information) regarding your child. This information may include:

- age;
- height;
- born weight;
- blood type;
- birth hospital;
- allergies;
- vaccinations dates;
- key dates (care visits etc);
- nurseries; and
- NHS Number,

(referred to together as “**MyBabyBox Data**” in this privacy policy).

Technical Information:

We also collect, store and use information about your use of the App, and about your computer, tablet, mobile or other device through which you access the App. This includes the following information:

- Technical Data: including the Internet protocol (IP) address, browser type, internet service provider, device identifier, your login information, time zone setting, browser plug-in types and versions, preferred language, activities, operating system and platform, and geographical location; and
- Usage Data: including the full Uniform Resource Locators (URL), clickstream to, through and from the App, pages you viewed and searched for, page response times, length of visits to certain pages, referral source/exit pages, page interaction information (such as scrolling, clicks and mouse-overs), date and time pages are accessed, and website navigation and search terms used.

- Location Data – certain functions of the App may make use of location data sent from your device to provide location-based services. You can turn off these functionalities at any time by adjusting the location services settings for the App on your device.

Third party data:

When you choose to connect the Platform and App with a third-party health and fitness related application or device, such as Apple Healthkit, MyFitnessPal, FitBit or Garmin, we will receive additional health and lifestyle data from the third-party providers of those services.

We may also collect information, including Health Data, directly from your GP and the NHS.

Aggregated Data:

We may also collect, use and share “**Aggregated Data**” such as statistical or demographic data for any purpose. For example, we may use Aggregated Data to publish reports on healthcare trends and trends in the usage of our applications and services. Aggregated Data could be derived from your personal information but is anonymised and is not considered personal information as it will **not** directly or indirectly reveal your identity.

Children

The App is not intended for or directed at children under the age of 16 years and, except in relation to MyBabyBox Data (where data is inputted by a parent or guardian), we do not knowingly collect information relating to children under this age.

Where you use MyBabyBox services, you are responsible for reviewing this Privacy Policy and ensuring that you are aware as to the way in which we will handle your child’s personal data.

WHAT WE DO WITH YOUR PERSONAL INFORMATION

As data controller, we will only use your personal information if we have a legal basis for doing so. The purpose for which we use and process your information and the legal basis on which we carry out each type of processing is explained in the table below.

Type of data	Purposes for which we will process the information	Legal Basis for the processing
Health Data	To register you with the App and provide you with our services.	Health Data falls within the meaning of “special category data” under data protection law, meaning it is afforded a higher degree of protection compared to regular personal data. We will only process your Health Data where we have obtained your explicit consent to do so.
MyBabyBox Data	To provide you with our MyBabyBox services.	As parent or guardian, we require your explicit consent to such processing on behalf of your child.

Type of data	Purposes for which we will process the information	Legal Basis for the processing
Contact data, personal information, third party data	To enable you to access and use the App and to allow us to supply services to you.	It is necessary for us to process your personal information in this way in order to fulfil our contractual obligations to you.
Location data	To enable you to access certain of our services (e.g. locating your nearest coronavirus testing centre).	Your consent. You can withdraw your consent at any time by disabling location data setting for the App in your settings.
Contact data, personal information, third party data	To carry out our obligations arising from any contracts entered into with you.	It is necessary for us to process your personal information in this way in order to enter into a contract with you and to fulfil our contractual obligations to you.
Contact data	To send you promotional materials and other materials that may be of interest to you, including information about us, our services, events or general promotions.	Consent (if required under data protection law) or where necessary for our legitimate interests to develop our services and grow our business. You can unsubscribe or opt-out from receiving these communications at any time by clicking the “unsubscribe” link in the email.
Contact data	To provide you with information and materials that you request from us.	It is in our legitimate interests to respond to your queries and provide any information and materials requested in order to generate and develop business.
Technical data, usage data	Use of cookies or similar technologies for data analytics to improve the App and email marketing (to the extent this processes your personal data).	Your consent.
Contact data, personal information	To: <ul style="list-style-type: none"> • manage payments, fees and charges and collect and recover money owed to us; • communicate about billing issues; or • enforce any contracts entered into with you. 	It is in our legitimate interests to process your personal information in this way in order to perform or enforce our contract with you.
Contact data	To send you information regarding changes to our policies, other terms and other administrative	It is in our legitimate interests to ensure that any changes to our policies, terms and other such

Type of data	Purposes for which we will process the information	Legal Basis for the processing
	information such as reminders, technical notices, updates and security alerts.	technical updates are communicated to you.
Contact data, technical data, third party data	To: <ul style="list-style-type: none"> • administer the App including resolving technical issues, troubleshooting, data analysis, testing, research, statistical and survey purposes; and • improve the App to ensure that content is presented in the most effective manner for you and your computer, mobile device or other item of hardware through which you access the App. 	For both these categories, it is in our legitimate interests to continually monitor and improve our services and your experience of the App and to ensure network security.
Contact data, technical data, third party data	To help create and maintain a trusted and safe environment on the App and platform by, among other things, detection and prevention of fraud and other harmful activity, conducting investigations and risk assessments, verifying any identifications provided by you, and conducting checks against databases and information sources for fraud detection and prevention, risk assessment and harm prevention purposes.	It is in our legitimate interests to carry out such checks to ensure prevention against fraud and other harmful activity and that the App and platform is safe and secure.

DISCLOSURE OF YOUR PERSONAL INFORMATION TO THIRD PARTIES

We will not sell, rent, lease or otherwise share your personal information other than as outlined in this Privacy Policy or without obtaining your consent beforehand.

We may share your personal information with our third party service providers and business partners who assist with the running of the App and the operation of our business including third party hosting providers and payment processors. Our third party service providers and business partners are subject to security and confidentiality obligations and are only permitted to process your personal information for specified purposes and in accordance with our instructions.

In addition, we may disclose information about you:

- to our professional advisers including lawyers, auditors and insurers;

- with any third party app or device provider which you have chosen to integrate the App with, such as Apple Health kit, MyFitnessPal, Fitbit or Garmin;
- with other members of our corporate group, to the extent reasonably necessary to achieve the purposes set out in this privacy policy;
- in the event that we sell or buy any business or assets, we may disclose your personal information to the prospective seller or buyer of such business or assets;
- if we are under a duty to disclose or share your personal information in order to comply with any legal or regulatory obligation. We will use commercially reasonable efforts to notify you where this is the case, to the extent permitted by law;
- if necessary, to protect the vital interests of a person; or
- to enforce or apply our contracts or to establish, exercise or defend the rights of MyHealthBox, its staff or other related persons.

Finally, you may use the App to share status update to your social media feeds. If you do so, the data you choose to share will be accessible to anyone having access to those feeds.

INTERNATIONAL TRANSFERS

Where we collect personal information from you, it may be necessary for us to transfer your personal information outside of the UK or the European Economic Area (“**EEA**”) to our service providers and business partners located outside the UK and the EEA.

Where personal information is transferred to and stored in a country not determined by the UK or European Commission as providing adequate levels of protection for personal information, we take steps to provide appropriate safeguards to protect your personal information, including entering into standard contractual clauses approved by the UK or the European Commission, obliging recipients to protect your personal information.

If you would like further information on the specific mechanism used by us when transferring your personal information outside of the UK or the EEA, please contact us using the details set out in the [Contacting Us](#) section above.

SECURITY OF YOUR PERSONAL INFORMATION

We use appropriate technical and organizational security measures to protect personal information both online and offline from unauthorized use, loss, alteration or destruction. We use physical and procedural security measures to protect information from the point of collection to the point of destruction. Your personal data is encrypted in transit and at rest. Where data processing is carried out on our behalf by a third party, we take steps to ensure that appropriate security measures are in place to prevent unauthorized disclosure of personal information.

Despite these precautions, however, we cannot guarantee the security of information transmitted over the Internet or that unauthorized persons will not obtain access to personal information.

HOW LONG WE KEEP YOUR PERSONAL INFORMATION

We will only retain your personal information for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal information for a longer period in the event of

a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information, whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

YOUR RIGHTS

In accordance with applicable privacy law, you have the following rights in respect of your personal information that we hold:

- **Right of access.** You have the right to obtain access to your personal information.
- **Right of portability.** You have the right, in certain circumstances, to receive a copy of the personal information you have provided to us in a structured, commonly used, machine-readable format that supports re-use, or to request the transfer of your personal data to another person.
- **Right to rectification.** You have the right to obtain rectification of any inaccurate or incomplete personal information we hold about you without undue delay.
- **Right to erasure.** You have the right, in some circumstances, to require us to erase your personal information without undue delay if the continued processing of that personal information is not justified.
- **Right to restriction.** You have the right, in some circumstances, to require us to limit the purposes for which we process your personal information if the continued processing of the personal information in this way is not justified, such as where the accuracy of the personal information is contested by you.
- **Right to object.** You have a right to object to any processing based on our legitimate interests in certain circumstances. You can also object to our direct marketing activities for any reason by clicking the “unsubscribe” link set out in any marketing communication you receive.
- **Right to withdraw consent.** If you have provided consent to any processing of your personal information, you have a right to withdraw that consent but without affecting the lawfulness of processing based on consent before its withdrawal.

Please note that not all of the above rights are absolute and we may be entitled to refuse requests, wholly or partly, where exceptions under the applicable law apply.

For example, we may refuse a request for erasure of personal information where the processing is necessary to comply with a legal obligation or necessary for the establishment, exercise or defence of legal claims. We may refuse to comply with a request for restriction if the request is manifestly unfounded or excessive.

EXERCISING YOUR RIGHTS

You can exercise any of your rights as described in this Privacy Policy and under data protection laws by contacting us as provided in the [Contacting Us](#) section above.

Save as described in this Privacy Policy or provided under data protection laws, there is no charge for the exercise of your legal rights. However, if your requests are manifestly unfounded or excessive, in

particular because of their repetitive character, we may either: (a) charge a reasonable fee taking into account the administrative costs of providing the information or taking the action requested; or (b) refuse to act on the request.

Where we have reasonable doubts concerning the identity of the person making the request, we may request additional information necessary to confirm your identity.

LINKS

The Platform and App may, from time to time, contain links to and from the websites of our business partners, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal information to these websites.

COMPLAINTS

If you have any questions or concerns regarding our Privacy Policy or practices, please contact us as provided in the [Contacting Us](#) section above. You also have the right to complain to the UK Information Commissioner's Office (<https://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 OUR PRIVACY POLICY

We reserve the right to change this Privacy Policy from time to time. Any changes will be posted on the App with an updated revision date. If we make any material changes to this Privacy Policy, we may notify you by email or by means of a prominent notice on the App prior to the change becoming effective.