

# Eviday Limited

## Privacy Notice

Last Updated: 16/05/2021

### Introduction

Eviday Limited (“Eviday”, “we, “our”) are committed to protecting the privacy and security of the personal data we collect about end customers and users of our services (“you/your”).

The purpose of this privacy notice is to explain what personal data we collect about you when you use our services and products such as our wellbeing and productivity platform. When we do this, we are the data controller.

Please read this privacy notice carefully as it provides important information about how we handle your personal information and your rights. It is important that you revisit this privacy notice regularly, as we may change the content to reflect how we deliver our services and products. If you have any questions about any aspect of this privacy notice you can contact us using the information provided below or by emailing us at [legal@eviday.ai](mailto:legal@eviday.ai).

### Personal data we collect

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK General Data Protection Regulation (“UK GDPR”). We are also subject to the EU General Data Protection Regulation (“EU GDPR”) in relation to the products and services we offer to individuals in the European Economic Area (EEA).

The personal data we collect may include (but is not limited to) your:

- name
- email address
- date of birth
- age
- gender
- information about dependents
- medical and health information
- racial or ethnic origin
- job title
- salary information
- log-in details and passwords

### **Usage Data**

We may collect information that your browser sends whenever you visit our website or when you access our services by or through a mobile device.

This usage data may include data including, but not limited to IP address, browser type, browser version, the pages of our website that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you access our services by or through a mobile device, this usage data includes information such as the type of used mobile device, the IP address of the mobile device, your mobile operating system, the type of used mobile internet browse, unique device identifiers and other diagnostic data.

Additionally, we may also collect tracking cookies data to optimize the usability of our services. Tracking cookies data includes, but is not limited to session cookies, preference cookies and security cookies.

You can instruct your browser to refuse all cookies or restrict which cookies are being sent. However, doing so may affect your ability to use our services in full extend.

## How your personal data is collected

We collect most of this personal data directly from you when you use our wellbeing and productivity platform. However, we may also collect information from:

- your employer, in order for us to share our surveys with you; and
- from third party organisations where they tell us that you would like to hear from us.

## Purposes for which we use personal data and the legal basis

When providing services to you, we may use your personal data for the following purposes and on the following lawful bases:

Purpose	Lawful Basis for Processing
To provide and maintain our services.	Consent
To allow you to participate in interactive features of our products or services when you choose to do so.	We have a legitimate interest, and we have balanced this against your rights as an individual.
To gather analysis or valuable information so that we can improve our services.	We have a legitimate interest, and we have balanced this against your rights as an individual.
To carry out our obligations and enforce our rights arising from any contracts entered into between you and us.	Performance of a contract between you and Eviday.

Purpose	Lawful Basis for Processing
<p>To provide you with news and general information about our products, services and events.</p>	<p>1. Consent</p> <p>2. We have a legitimate interest, and we have balanced this against your rights as an individual</p>
<p>To comply with any legal obligations we may have.</p>	<p>Eviday is required to process your personal data for various legal and regulatory purpose. For example:</p> <ul style="list-style-type: none"> <li>• to retain information for a specified amount of time; and</li> <li>• to disclose and exchange certain information with law enforcement agencies and regulatory bodies to comply with our legal obligations.</li> </ul>
<p>To monitor the usage of our services.</p>	<p>We have a legitimate interest, and we have balanced this against your rights as an individual.</p>
<p>To detect, prevent and address technical issues.</p>	<p>We have a legitimate interest, and we have balanced this against your rights as an individual.</p>
<p>To provide you with notices about your usage of our services, including email instructions, etc.</p>	<p>We have a legitimate interest, and we have balanced this against your rights as an individual.</p>

Where personal data is processed because it is necessary for the performance of a contract to which you are a party, we will be unable to provide our services without the required information.

## Sharing your data

For some business activities we share your personal data with our vendors and third-party service providers. We may also share data with providers of web-based tools and services, which we use to operate our services. For example, we use Typeform for survey tools and Google for web analytics services.

Personal data may also be shared with government authorities and/or law enforcement officials for the prevention or detection of crime, if required by law or if required for a legal or contractual claim.

## Transfers of data

We place significant importance on protecting the confidentiality of personal data and seek the collaboration of all our suppliers in fostering this goal. Transfers of data outside the European Economic Area (EEA) and UK are subject to special rules under the EU and UK GDPR. We will only transfer personal data to a supplier where the supplier has provided assurances that they will provide at least the same level of privacy protection as is required by this notice.

When we do transfer information outside the EEA or UK, we will only do so on the basis of Standard Contractual Clauses approved by the European Commission or UK government, which contractually oblige the recipient to process and protect your personal data to the standard expected within the EU and UK.

Should we become aware that a supplier is using or sharing personal data in a way that is contrary to this notice, we will take reasonable action to prevent or stop such processing and notify any individuals whose data was affected.

## How long we keep your data

We will retain your personal data for as long as is necessary to provide you with our services and for a reasonable period thereafter to enable us to meet our contractual and legal obligations and to deal with complaints and claims.

We will also retain usage data for internal analysis purposes. Usage data is generally retained for a shorter period, except when this data is used to strengthen the security or to improve the functionality of our services, or we are legally obligated to retain this data for longer time periods.

At the end of the retention period, your personal data will be securely deleted or anonymised, for example by aggregation with other data, so that it can be used in a non-identifiable way for statistical analysis and business planning.

## **How we protect your data**

The security of your data is our top priority. As such we follow industry-standard practices and have implemented appropriate technical and organisational measures to protect data that we process from unauthorised disclosure, use, alteration or destruction. For example, we limit access to your personal data to those who have a genuine business need to access it. Those processing your data will do so only in an authorised manner and are subject to a duty of confidentiality.

## **Automated decision-making and profiling**

We conduct automated decision making and profiling as part of the services we provide. When you provide us with your information by responding to our surveys, we automatically process this data to segment survey respondents and generate tailored recommendations based on survey responses. We have conducted an impact assessment to identify and mitigate any risks to individuals based on this processing.

## **Your rights and options**

You have the following rights in respect of your personal data:

- You have the right of access to your personal data and can request copies of it and information about our processing of it.

- If the personal data we hold about you is incorrect or incomplete, you can ask us to rectify or add to it.
- Where we are using your personal data with your consent, you can withdraw your consent at any time.
- Where we are using your personal data because it is in our legitimate interests to do so, you can object to us using it this way.
- Where we are using your personal data for direct marketing, including profiling for direct marketing purposes, you can object to us doing so.
- You can ask us to restrict the use of your personal data if:
  - It is not accurate.
  - It has been used unlawfully but you do not want us to delete it.
  - We do not need it any-more, but you want us to keep it for use in legal claims; or
  - if you have already asked us to stop using your data but you are waiting to receive confirmation from us as to whether we can comply with your request.
- In some circumstances you can compel us to erase your personal data.
- You can request a machine-readable copy of your personal data to transfer to another service provider.
- You have the right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.

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 for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

**If you wish to exercise your rights, please contact our data protection officer at [legal@eviday.ai](mailto:legal@eviday.ai).**

You can also lodge a complaint with the Information Commissioner's Office. They can be contacted using the information provided at: <https://ico.org.uk/concerns/>.

## Contact us

If you have any questions, or wish to exercise any of your rights, then you can contact us by addressing your correspondence to:

49 Cassia Building, Gorsuch Place, London, England, E2 8HY

Alternatively, you can email us at **[legal@eviday.ai](mailto:legal@eviday.ai)**.

## Changes to this privacy notice

We may update this notice (and any supplemental privacy notice), from time to time as shown above. We will notify of the changes where required by applicable law to do so.