

## 1.31 Privacy Policy

This privacy policy sets out how we use and protect information provided when using our services. The services and all associated systems are owned and operated by Healthy Performance Ltd, who are committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using our services, then you can be assured that it will only be used in accordance with this privacy statement, which was updated in October 2020.

### What information do we collect?

We may collect the following information as part of completion of our services:

- Your Name, Age and Company Name
- Your department or location of work (for aggregated data only)
- Contact information including email address and telephone number
- Application survey responses within our wellbeing applications.

This includes:

- Self assessed information on your health and wellbeing
- Personal information about your opinion of your own health and wellbeing
- Contact information including email address and telephone number
- Application survey responses within our wellbeing applications.
- Self assessed information on your health and wellbeing
- Personal information about your opinion of your own health and wellbeing
- Clinical data taken during a health assessment

### What we do with the information we gather?

We require information to understand your needs and provide a better service, the information gathered from the following services: Employee Health Assessment, Covid-19 antibody testing, MyWellbeingCheck, and Pascal is used for the following:

- To provide personalised analysis and reports for you about your own data
- To provide anonymised company reports of all data to help employers better understand and plan their corporate wellbeing strategy

No identifiable personal data will be shared with your employer.

### **Antigen testing:**

The results generated from Covid-19 antigen testing will be shared with your employer in order to facilitate the safe self-isolation of all individuals that test positive for the SARS-CoV-2 virus. The data will be passed to a designated contact who will ensure that employees leave the site immediately to start self-isolation as set out by the Public Health England guidance on coronavirus. Attending the appointment is consent for your Covid-19 antigen test result to be shared with your employer.

### **How long will you keep my data?**

We will only retain your personal data 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 data 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.

### **Internal record keeping**

We may use the information to improve our products and services. We may also produce anonymised health reports to highlight health trends however these reports will be aggregated with no personal details shared with anyone, at any time.

### **Security**

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

### **How we use cookies**

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website and services. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our services in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

### **Links to other websites**

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by

this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

## Your Rights

You have the following rights:

- to access any personal data that we hold about you
- to have inaccurate personal data rectified, or completed if it is incomplete
- to request to have personal data erased
- to request the restriction or suppression of personal data
- to receive personal data you have provided in a structured, commonly used and machine-readable format and to request that we transmit any such data directly to another data controller
- to complain to the Information Commissioner's Office

Further details can be found on the Information Commissioner's Office website at [www.ico.gov.uk](http://www.ico.gov.uk). Please do not hesitate to contact us in the first instance. 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 is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

## Controlling your personal information

We will not sell, distribute or lease your personal information to third parties at any time unless we have your permission or are required by law to do so. We may share your personal data with third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

You may contact us to exercise any of your rights (detailed above) under the General Data Protection Regulations (GDPR) May 2018 by emailing [data@healthyperformance.co.uk](mailto:data@healthyperformance.co.uk) or writing to Healthy Performance Ltd, Unit 7 The Court, Holywell Business Park, Northfield Road, Southam, Warwickshire, CV47 0FS. If you believe that any information we are holding on you is incorrect or incomplete, please inform us as soon as possible and we will promptly correct any information found to be incorrect.