



Mywellbeingindex Privacy Policy

## PRIVACY AND COOKIES

Mywellbeingindex Limited t/a KAYA (We) are committed to protecting and respecting your privacy.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting [www.mywellbeingindex.co.uk](http://www.mywellbeingindex.co.uk) you are accepting and consenting to the practices described in this policy.

For the purpose of the 2018 General Data Protection Regulation (GDPR), the data controller is Mywellbeingindex.

## INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

Information you give us:

- You may give us information about you by filling in forms on our site [www.Mywellbeingindex.co.uk](http://www.Mywellbeingindex.co.uk) – including on My Mywellbeingindex (our site), by registering for one of our events or by corresponding with us by phone, email or otherwise. This includes information you provide when you register to use our site, when you place an order on our site and when you report a problem with our site. The information you give us may include your name, information for your My Mywellbeingindex profile and any other relevant information you provide in any circumstance.

- You, or your organisation, may give us information about participants from your organisation during the set-up process for Corporate surveys. This may include email addresses, job-titles, gender and any other data that your organisation feels reasonably necessary to provide insightful analysis of the survey results.

- By completing the surveys you will give us your answers to the respective questions. Team respondents are not personally identifiable to us.

Information we collect from you:

- Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;

- Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); items you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

## COOKIES

Our website uses cookies. A cookie is a small file of letters and numbers that we put on your computer if you agree. These cookies allow us to distinguish you from other users of our website, which helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

We use the following cookies:

- Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website.

- Analytical/performance cookies. These allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website 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 website. 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 website, the pages you have visited and the links you have followed. We will use this information to make our

website and any advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

## USES MADE OF THE INFORMATION

We use information held about you in the following ways:

Information you give to us. We will use this information:

- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us
- to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about, or about any changes to our service;
- to provide you with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you by electronic means (email or SMS) with information about services similar to those which were the subject of a previous sale or negotiations of a sale to you. We will not pass your details on to third parties for marketing purposes;
- to generate your survey results and related analysis. These results are used to produce an RBX Index and gap analysis, accessible only by you, Mywellbeingindex and, where relevant, our point of contact at your organisation who is responsible for administering the surveys. Mywellbeingindex may use your results to update industry benchmarks or other trends, but the results will never be personally attributable to you unless you give your explicit consent for them to be so.
- to ensure that content from our site is presented in the most effective manner for you and for your computer

Information we collect about you. We will use this information:

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others,

and to deliver relevant advertising to you; to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

## DISCLOSURE OF YOUR INFORMATION

We may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We may share your information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with you – as will be made clear on the contract at the time of engagement;
- Analytics providers that assist us in the improvement and optimisation of our site;
- Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you;
- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation in any contracts between us or to protect the rights, property, or safety of The CPD Certification Service Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## WHERE WE STORE YOUR PERSONAL DATA

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (EEA). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

### THIRD PARTY DATA PROCESSORS

In the course of providing our services to you, we use a number of third party resources to process and store your data:

3rd Party Data Processor Name: Stripe

Privacy Policy: <https://stripe.com/gb/privacy>

Purpose: To take payment securely (Mywellbeingindex do not have access to your payment card details via Stripe)

3rd Party Data Processor Name: ZohoCRM

Privacy Policy: <https://www.zoho.com/privacy.html>

Purpose: To securely store customer contact information and communication records. The CRM is password protected.

3rd Party Data Processor Name: Microsoft Outlook

Privacy Policy: <https://privacy.microsoft.com/en-gb/privacystatement>

Purpose: For email services. All our accounts are password protected.

3rd Party Data Processor Name: Rackspace

Privacy Policy: <https://www.rackspace.com/information/legal/privacystatement>

Purpose: Cloud hosting services within the UK.

### YOUR RIGHTS

Your information will be held for as long as reasonably necessary to fulfil the purpose of a contract.

Access to Your Information

You have rights to the following information:

- The purpose(s) for which we are processing your information;
- The categories of personal information we hold about you;
- The recipients or categories of recipient to whom the personal data have been or will be disclosed;
- The period for which we will store your information; or the criteria used to determine that period;
- You have the following additional rights:
  - To a copy of the information we hold about you. You can ask us to send this to you or direct to a third party and in commonly used electronic form;
  - To rectification or restriction of the way in which we are processing your information; or to object to us processing it;
  - To erasure of your personal information provided it is no longer necessary for the purposes for which it was collected; or where there is no legal basis for Mywellbeingindex processing it.
  - Where we have collected information about you from sources other than yourself, information about those sources;
  - To ask us whether any decisions are being taken about you by automated means and if this is happening; information about the logic involved and any significant consequences on you;
  - To ask us about the appropriate safeguards we are take if we transfer your information to a third country or international organisation.

You can exercise any of these rights at any time by emailing [info@Mywellbeingindex.co.uk](mailto:info@Mywellbeingindex.co.uk)

If you are not satisfied about the way in which your information is handled you have the right to lodge a complaint to the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

**RECTIFYING OR UPDATING YOUR INFORMATION**

You must ensure that any information you provide to us is correct and complete. You can ask us to rectify or update your personal information at any time by email to [info@Mywellbeingindex.co.uk](mailto:info@Mywellbeingindex.co.uk)

#### PORTABILITY

To the extent we have any of your personal information you can ask us to move it to another provider

#### CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our privacy policy in the future will be posted on this page and, where we think it appropriate, notified to you by email. Please check back frequently to see any updates or changes to our privacy policy.

#### INFORMATION ABOUT US

[www.Mywellbeingindex.co.uk](http://www.Mywellbeingindex.co.uk) is a site operated by Mywellbeingindex Ltd, a company registered in England and Wales under company number 08026948 and with its registered office and main trading address at The Old Bakehouse, Dove walk, Uttoxeter, Staffordshire, ST14 8EH

The company VAT number is 158 6109 93.

#### CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [info@Mywellbeingindex.co.uk](mailto:info@Mywellbeingindex.co.uk)

#### DATA PROTECTION OFFICER

Our appointed DPO is Ram Raghavan and he can be contacted at [ram@Mywellbeingindex.co.uk](mailto:ram@Mywellbeingindex.co.uk)

#### POLICY REVISION HISTORY

Updated on 31st January 2020.

Originally completed on 8th May 2018.

01753 372193 [HELLO@MYWELLBEINGINDEX.CO.UK](mailto:HELLO@MYWELLBEINGINDEX.CO.UK)