# **Privacy Policy**

Isio Group Limited respects your right to privacy. This privacy and cookie policy sets out details of the information that we may collect from you and how we may use that information.

In this privacy and cookie policy, references to "we", "us" or "our" is to Isio Limited a company incorporated in England and Wales (registered number 12273083) whose registered office is at 10 Norwich Street, London, EC4A 1BD.

If you have any questions about how we collect, store and use your information, you may contact us by using the contact details under Contact Us below.

## Scope

This policy applies to all products and services provided by Isio Group Limited and used by you via this website.

# Your privacy

This privacy and cookie policy is meant to help you understand what data we collect, how we use that data and the choices we offer you, including how to access and update information.

We will at all times only collect and process your personal information in accordance with the UK General Data Protection Regulation, the UK Data Protection Act 2018 and any subsequent national implementing legislation, the Privacy and Electronic Communications (EC Directive) Regulations 2003 and any other applicable data protection legislation.

At no time will we trade, sell, or distribute your personal information to any individual, company, vendor or organisation, in ways other than disclosed in this privacy statement. If you have any questions or concerns regarding our privacy practices please contact us via the contact details set out under Contact Us below.

#### Information we collect

We collect information for authenticating your right to use this website, optimising your experience, and providing you with customer service. We will not collect information that is irrelevant to the purpose of providing you with access to or use of this website. We collect the following information:

- Essential information that you may give us or may be given to us by your employer in order for you to use this website may include first name, last name, email address, and postal code.
- Additional personal information you can decide to provide us with additional information that will allow you to use additional functionality on this website.
- Additional information provided by you may include:
  - o Preferences and reminders
  - Home Address
  - o Telephone number
  - o Mobile phone number
  - Date of birth
  - Automatically generated logging information created while you use this website may including:
    - · Customer service enquiries
    - Clickstream information
    - · Cookies

# Legal basis for processing

Our processing of your personal information is necessary firstly for the performance of a contract to which you are a party to, to fulfil a contract we have with our clients and for the purposes of legitimate interests pursued by us.

Isio Group Limited reserves the right to disclose your personally identifiable information, as required by law and when it is believed that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, or legal process.

## Legitimate interests

As stated above, our processing of your personal data is necessary for the purposes of legitimate interests pursued by us, namely: (i) to provide you with a safe, smooth, efficient and customised experience; (ii) to make sure you receive updated information on our business activities; (iii) to enable you to access the benefits and services on this Website; (iv) for our own marketing and research; (v) evaluate, develop, enhance, and improve our benefits and services; (vi) to prevent, detect, investigate and prosecute fraud and alleged fraud, money laundering and other crimes; (vii) to comply with laws and regulations, (viii) to share your information with our partners and service providers, (ix) to facilitate the operation of long service, rewards, recognition and other benefits, and (x) to transfer your information to or share it with any third party to whom your account has been or may be transferred following a restructure, sale or acquisition of Isio Group Limited.

#### How we use the information

We use the information we collect for the following purposes:

- Essential information, which may include name, email, and postal code is used to verify your affiliation with your employer, authenticate you to a unique account, communicate with you and enable you to access the benefits and services of this website.
- Information generated while on the site is used by Isio Group Limited to protect you, provide you with customer service, prevent fraud, operate this website on behalf of your employer, affect session management and respond to your requests.

We will only retain your personal information for as long as is reasonably necessary to fulfil the legitimate business purpose, or as may be required by law.

# Automated processing

We do not carry out automated decision-making or profiling in relation to your personal information.

#### Information we share

Information about you is an important part of our business. Isio Group Limited only shares your information as described below. All information sharing is based on the principle of sharing only the information necessary to fulfil the legitimate business purpose.

- Aggregated information from which no individual person could be identified representing the general use of the website is shared with your employer to evaluate the effectiveness and value of the website.
- Information on whether you have made use of this website may be provided to your employer to minimise redundant or irrelevant communications.

- Other website or transactional activity may be provided to your employer in the form of reports; for example to facilitate the operation of long service, rewards, recognition and other benefits.
- If your employer has contracted a third party, any of the above information we share with your employer may also be shared with the third party.
- All of the information we collect, as described above, to companies that perform traditional IT services on our behalf such as data management firms, call centre providers.

## When we might share information with third parties

We do not sell your information to any third parties; however, we may disclose your personal information to third parties in a very limited number of circumstances:

- Where we engage the business services of a third party to provide services directly to Isio Group
  Limited. For example, we may use a mailing house to email promotional materials such as our email
  newsletter. Rest assured that any third parties are strictly prohibited from using your personal data for
  any other purposes.
- When we verify your information with your employer.
- In the event that we sell any business or assets, in which case we may disclose your personal data to the buyer of such business or assets.
- If Isio Group Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use on this website and other agreements; or to protect the rights, property, or safety of Isio Group Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
- When analytics and search engine providers assist us in the improvement and optimisation of our website.

# Sharing information outside the UK/ European Economic Area ("EEA")

Your personal information may be transferred to, and stored at, a destination outside the UK/EEA and may also be processed by staff operating outside the UK/EEA who work for us, or for one of our service providers. These staff may process your personal details and assist us in providing support services to you.

When we, or our permitted third parties, transfer your information outside the UK/EEA, we or they will impose contractual obligations on the recipients of that data to protect your information to the standard required in the UK/EEA. We or they may also require the recipient to subscribe to international frameworks intended to enable secure data sharing. In the case of transfers by us, we may also transfer your information where: (i) the transfer is to a country deemed to provide adequate protection of your information by the Information Commissioner's Office; or (ii) where you have consented to the transfer. If you would like to obtain a copy of the appropriate safeguard used to transfer your personal information outside the UK/EEA please contact us using the contact details set out under Contact Us.

# How we protect the information

We are committed to protecting the confidentiality of your information. We take reasonable measures to secure your information, this includes industry standard administrative, physical and technical controls. These controls include encryption, third party audits, access controls and security testing.

# Your rights

You have rights concerning the way that we use your information, for example you have the right to:

- Be informed about the processing of your personal data (i.e. for what purposes, what types, to what recipients it is disclosed, storage periods, any third party sources from which it was obtained, confirmation of whether we undertake automated decision-making, including profiling, and the logic, significance and envisaged consequences).
- Object to your personal data being processed for a particular purpose or to request that we stop using your information.
- Request not to be subject to a decision based on automated processing and to have safeguards put in place if you are being profiled based on your personal data.
- Ask us to transfer a copy of your personal data to you or to another service provider or third party where technically feasible and otherwise required by applicable regulations.
- Withdraw, at any time, any consent that you have previously given to us for our use of your personal data. However this will not affect the lawfulness of the processing of your personal data before your withdrawal of consent.
- Ask us to stop or start sending you marketing messages at any time.
- Request access to your personal data (commonly known as a "data subject access request"). This
  enables you to receive a copy of the personal data we hold about you and to check that we are
  lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any
  incomplete or inaccurate information we hold about you corrected. It is important that the
  personal data we hold about you is accurate and current. Please keep us informed if your
  personal data changes during your working relationship with us.
- Request the erasure of your personal data. This enables you to ask us to delete or remove personal data where you think that we do not have the right to process it and if necessary we will contact your employer. Completely removing your personal information from the database will negate your ability to login and use to the Scheme. Should we be unable to remove your data due to legal or H. M. Revenue and Customs constraints, we will ensure that the data is blocked or disabled.

Any request for access to or a copy of your personal data must be in writing and we will endeavour to respond within a reasonable period and in any event within one month. We will provide this information free of charge unless the request is manifestly unfounded or excessive. To comply with the Information Commissioner's Standard Contractual Clauses, Isio Group Limited may need to notify and obtain authorisation from your employer prior to responding to any request.

If you would like to contact us in relation to any of the rights set out above please contact us using the contact under Contact Us below. To protect your privacy and security, we may take reasonable steps to verify your identity before providing you with the details. You also have the right to make a complaint to the Information Commissioner's Office, which regulates and supervises the use of personal data in the UK, via their helpline on 0303 123 1113.

#### Cookies

We may use cookies to provide you with the best experience whilst using this website, to manage your browser sessions and to ensure the website's optimal functionality. Cookies are required to allow you to use all of the website's functions. Disabling cookies will limit functionality and may significantly hinder the user experience.

Some business partners (e.g., advertisers, tracking utilities) use cookies and web beacons on their site(s). Isio Group Limited does not have access or control over these tracking technologies. Isio Group Limited does not share your personal data with these advertisers.

This privacy and cookie policy covers the use of cookies on this website. It does not cover the use of cookies by any third parties.

For more information about cookies, including further details as to what they are and how to refuse them, please visit <a href="www.allaboutcookies.org">www.allaboutcookies.org</a>.

## Direct marketing

For you to successfully make use of this website, we may need to send you system generated emails.

Other marketing type emails may contain an opt-out facility. You may opt out of correspondence relating to the use of this website by using the Contact Us facility on this website.

# Third Party and Retailer's privacy and cookie policies

Links on this website may redirect you to a third party or participating retailer's web site. At the point you enter the third party web site, the privacy and cookie policy of the third party will apply to any information you provide. It is important to read and familiarise yourself with the third party's privacy and cookie policy.

#### Contact us

Please direct your questions or comments to the Contact Us page on the Website or by writing to us at:

The Data Protection Officer, Isio Group Ltd c/o SPS PO Box 721 Salford M5 OOT

Email:dataprivacy@isio.com

# Notification of changes to this policy

This privacy and cookie policy was last updated on 1 October 2022.

Our privacy and cookie policy will be reviewed and enhanced from time to time. Please check our website or contact us for a copy of the current privacy and cookie policy. In this way you will be made aware of policy changes prior to carrying out further activity on this website. As always, if you are not amenable to the conditions of a revised privacy and cookie policy you may opt-out by contacting us.