IMPORTANT NOTICE - The purpose of ImproveWell is to enable users to submit feedback and suggestions for improvement to participating organisations. It is not to be used for reporting incidents or near misses which occur within the workplace. To report an incident or near miss, users must follow the protocols set by their organisations.

## 1. ABOUT US AND THIS PRIVACY POLICY

The ImproveWell app ("App") is made available at www.improvewell.com and/or on a site hosted by any app store/app provider or operator ("App Site") and is owned and controlled by ImproveWell LTD ("ImproveWell", "we", "us", "our"). ImproveWell LTD is a private limited company registered in England and Wales (10399916) with headquarters registered at 21 Ellis Street, London, United Kingdom, SW1X 9AL.

This Privacy Policy explains what personally identifiable information is collected and recorded about you or that you provide to us during your use of the App and what we do with that information. Please read this Privacy Policy carefully because by using the App you are deemed to have consented to this Privacy Policy. Please also see our Terms of Use which govern your access to and use of the App.

For the purpose of the Data Protection Act 1998, the data controllers in respect of personally identifiable information that is collected via the App are ImproveWell and the Organisation.

### INFORMATION WE PROCESS AND COLLECT ABOUT YOU

We or the Organisation may collect and process the following data about you:

- Information you give us: You may give us information about you by filling in forms in the App or on the App Site, submitting feedback or ideas for improvement via the App or by corresponding with us (for example, via the Contact Us functionality). The information you give us may include your name, job title, place of work, e-mail address and other contact details, username, password and other registration information, personal description and photograph. If you give us information about another person, you confirm that they have consented to our use of their information in accordance with this Privacy Policy.
- Information we collect about you and your device. Each time you use the App or contact us we may automatically collect the following information:
  - technical information, including the type of mobile device you use, a
    unique device identifier (for example, your device's IMEI number, the
    MAC address of the device's wireless network interface, or the mobile
    phone number used by the device), mobile network information, your
    mobile operating system, the type of mobile browser you use, time zone
    setting;

- details of your use of any of the App and the resources that you access;
   and
- a record of your correspondence with us.

#### 2. USES MADE OF YOUR INFORMATION

We or the Organisation may use information held about you in the following ways:

- to recognise you as an App user;
- to inform you about, and allow you to participate in activities in the App, for example by notifying you about improvements currently being implemented by the Organisation;
- to respond to any comments or questions you may have and to the feedback you submit via the App;
- to improve services provided by the Organisation; and
- to generate statistics, analyse usage and navigation within the App, to administer the App and for internal operations, so we can improve the App and present content in the most effective manner for you and your device.

## 3. DISCLOSURE OF YOUR INFORMATION

We may disclose some or all of the data we collect from you when you download or use the App to the Organisation to allow the Organisation to review your feedback and implement any necessary follow-up.

We may also disclose your data to the Organisation and other third parties if:

- it is necessary in order to enforce or apply our Terms of Use or to investigate potential breaches, or protect the rights, property or safety of ImproveWell; or
- 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.

We may engage third parties to operate the App or provide other specific functions in relation to the App, who may be provided with access to your information in order to perform their specific functions. We may also disclose or share your personal data where necessary to comply with any legal obligation or request, where there is a complaint relating to your use of the App and/or for the purposes of obtaining professional advice (for example, legal advice).

We may sell, share or otherwise transfer information about users of the App in an anonymous or aggregate form with third parties, including advertisers, business partners, and sponsors, for the purposes of, without limitation, understanding customers trends and patters and managing and improving our commercial and other relationships.

#### 4. STORAGE AND SECURITY

The data that we collect from you is transferred to, and stored at, a destination within the European Union. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

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 the App; any transmission is at your own risk.

## 5. YOUR RIGHTS

In certain circumstances, we may use your information for the purposes of marketing our own products and services to you and for purposes of marketing by the Organisation (for example, when you have opted in to receiving marketing communications from us or the Organisation). You have the right to ask us not to process your personal data for marketing purposes.

We will inform you (before collecting your data) if we or the Organisation intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You may also request that we stop sending marketing information to you at any time by contacting us at hello@improvewell.com. Our App may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates (including, but not limited to, websites on which the App is advertised). If you follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services, such as contact and location data. Please check these policies before you submit any personal data to these websites or use these services.

If you would like to access the information we hold about you or cancel, erase, correct or update the information you may email us at hello@improvewell.com. Any such request may be subject to a small fee to meet our costs in providing you with details of the information we hold about you.

If you have a complaint about the way we have handled your personal information, you can contact the UK Information Commissioner's Office. Full details of when and how to complain are available at <a href="https://www.ico.org.uk/concerns/">www.ico.org.uk/concerns/</a>.

## 6. CHANGES TO PRIVACY POLICY

Any changes we may make to our Privacy Policy in the future will be posted on our website at hello@improvewell.com and, where appropriate, notified to you. The new terms may be displayed on-screen and you may be required to read and accept them to continue your use of the App.

# 7. CONTACT

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to hello@improvewell.com.