

Last updated: 23 March 2022

## Privacy / Transparency Notice

The purpose of the ImproveWell App is to enable users to submit feedback and suggestions for improvement to your employer or other professional organisation that provided you with an authentication code ("participating organisation"). 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 the participating organisation.

## ImproveWell and Your Information

ImproveWell takes your privacy very seriously.

The ImproveWell application ("App") is made available for download at [www.improvewell.com](http://www.improvewell.com) (the "Site") 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"). In this policy, "user" or "you" means any individual using the ImproveWell services, whether as a visitor to the Site, or a user who downloads the App. This Privacy Policy forms part of and is incorporated into our Terms and Conditions.

ImproveWell LTD is a private limited company registered in England and Wales (10399916) with headquarters registered at Studio 1, 305a Goldhawk Road, London W12 8EU.

We are registered with the Information Commissioner and our registration number isZA275449.

This privacy policy explains what personally identifiable information ("Personal Data") is collected and recorded about you and what we do with that information.



### How Does ImproveWell Collect my Information?

ImproveWell acts as a Processor on behalf of professional organisations using the App to gather feedback.

We will collect information: 1) directly provided by you when you enter it via the App; 2) automatically when you visit the Site or use the App; and 3) received from the participating organisation.

The information we collect will be stored on electronic systems.

#### 1. Information directly provided by you

The information includes Personal Data such as your:

- name;
- job title;

- place of work;
- e-mail address;
- other contact details;
- username;
- password;
- other registration information;
- personal description;
- photograph (if you choose); and
- details about how you are feeling about your day at work.

We are collecting, storing and using this information because the professional organisation has directly engaged us and you have provided your consent via the App, or through another lawful basis established by the professional organisation.

! It is not our intention to collect sensitive information about your physical or mental health; please do not provide this information to ImproveWell. If you do provide it, this will be an indication that you consent to us processing this information.

! Information collected through the “How I’m Feeling” functionality is presented to participating organisations in aggregate, de-identified form. This functionality is not devised to reveal individual submissions. In some cases (e.g. when participating in small user groups, or a unique combination of user groups, and choosing to share specific information in free text) it is possible for individual submissions to become identifiable.

! The App is not devised to collect someone else’s Personal Data; please do not provide this information to ImproveWell. If you give us Personal Data about another person, you confirm that they have consented to our use of their information in accordance with this Privacy Policy. You should ensure that they can review and have reviewed this Privacy Policy.

## **2. Information collected automatically**

We also collect information automatically each time you use the App. This information supports our legitimate interests as a commercial entity, and we have provided justification for these uses below;

Data Field	Justification / Use	Strictly Necessary or internal legitimate interest	Consent (Cookie or Privacy Policy)
Mobile network information	allows us to understand the connection speeds which can impact user experience of the app.	Internal legitimate interest	Privacy policy
Mobile operating system	provides context on the version of the operating system used across our user base so that we can ensure compatibility.	Internal legitimate interest	Privacy policy
Type of mobile browser you use	tells us which browsers are used across our user base. Each browser behaves differently so can require additional work to ensure consistent functionality.	Internal legitimate interest	Privacy policy
Time zone setting	is used to improve performance of the mobile apps. This information provides context on the time of day that our app is being used within which can influence our product roadmap. For example, it allows us to understand when we should be sending our notifications – including any privacy policy updates.	Internal legitimate interest	Privacy policy
Geographic location information	is used to improve performance of the mobile apps. This information provides context on where our application is being used and can influence features such as language translation.	Internal legitimate interest	Privacy policy
Details of your use of the App and the resources that you access	is used to improve performance of the mobile apps. This information tells us which specific features of the app are being used the most and the least. It provides context on deciding which features to promote and prioritise.	Internal legitimate interest	Privacy policy
Domain server (including IP Address)	Our data aggregators - such as Google Analytics – will hash the IP address to ensure that we are unable to identify	Internal legitimate	Cookie policy for the Site

Data Field	Justification / Use	Strictly Necessary or internal legitimate interest	Consent (Cookie or Privacy Policy)
	particular individuals. This allows us to have a view of relevant information such as the country of users of our products. For the App, we require this information for security audit purposes to permit forensic analysis of access to the system.	interest for the Site  Strictly necessary for the App	Privacy policy for the App
Type of device / computer accessing the Site	Websites can be rendered differently across different devices. This information provides context on the devices accessing the site.	Internal legitimate interest	Cookie policy
Type of web browser used to access the Site	Web browser behave in different ways so having information on which browsers access the site ensures we can present the best experience to all users.	Internal legitimate interest	Cookie policy
Referring source which may have sent you to the Site	The referral source tells us which other websites are directly traffic to the Site. For example, a link to our site shared on Twitter will appear here. This informs us which other webpages are important for increasing awareness of our product.	Internal legitimate interest	Cookie policy
Other information associated with the interaction of your browser and the Site and cookies	This information provides valuable analytics to ensure that the Site loads quickly and also tells which pages are of most interest to our users.	Internal legitimate interest	Cookie policy

We also want to make it clear that when we are processing the data for these purposes, it is not in identified form. The data is presented in aggregated form and ImproveWell does not link this information to a particular user.

ImproveWell does not collect personal data in order to share with third parties (other than our providers as listed) or for commercial gain (beyond the customer relationship and development of our own product) nor do we use your information for any targeted marketing activities.

The Site uses cookies to improve your experience. You can read more about cookies and how to manage them in our cookie policy available at [www.improvewell.com/cookie-policy](http://www.improvewell.com/cookie-policy).

### 3. Received from the participating organisation

To invite you to the ImproveWell platform, the participating organisation may provide us with Personal Data such as your:

- name;
- job title;
- place of work; and
- e-mail address.



## How Does ImproveWell Use my Information?

ImproveWell will use your information in the following ways:

1. to recognise you as an App user and enable you to make use of the features and benefits of the App, such as recording your improvement ideas, sharing how your day at work is going and completing surveys;
2. to provide you with general updates from the participating organisation, for example by notifying you about improvements planned or currently being implemented;
3. to inform you about new features and benefits of the App; and
4. to respond to any comments or questions you may have and to the feedback you submit via the App.

To undertake these activities, your information will be shared internally across our teams.



## How Else Does ImproveWell Use My Information?

Along with activities related directly to the participating organisation, we also use your information:

- to improve services provided by the participating organisation;
- 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.

To help organisations measure improvement over time, we may analyse the tone or “sentiment” of free text submissions in aggregated, de-identified form. This helps organisations to identify trends in positive, negative or neutral sentiment. This functionality is not devised to reveal the sentiment of individual data submissions.



## Who Does ImproveWell Share My Information With?

ImproveWell works hard to ensure that only the right people have your information and that they are only given the information they need.

- We will disclose some or all of your Personal Data when you download or use the App to allow the participating organisation to review your feedback and implement any necessary follow-up.
- Information collected through the “How I’m Feeling” functionality will be shared with the participating organisation without direct identifiers such as your name and email address.

We will also disclose your Personal Data to the participating 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 will disclose your Personal Data to the confirmed buyer of such business or assets. We will notify you, giving you an opportunity to object or to withdraw consent.

If we engage third parties to operate the App or provide other specific functions in relation to the App, they will be provided with access to your Personal Data, where necessary, in order to perform their specific functions.

You have a right to raise objections to the way we process your information. Our Data Protection Officer will be happy to discuss this with you.

ImproveWell uses other companies to help us deliver some of our services such as:

- Provision of connectivity and cloud-hosted servers ([AWS](#))
- Provision of a 24/7 customer support ticketing system ([Zendesk](#))
- Provision of product analytics to improve customer experience ([Amplitude](#) and [Sentry](#))
- UK- or EU-based technology partners involved in business and domestic software development (providers engaged as required)
- Undertaking audits (providers engaged as required)

We have contracts in place with these organisations that prevent them from using your Personal Data in any way other than as expressly authorised by us. These contracts also require them to maintain adequate standards of security to ensure your confidentiality.

We work alongside other professional organisations who support us in the operation of our business and will share Personal Data with them where this is required and lawful. Where we make decisions about Personal Data together, we are called 'Joint Data Controllers' and the contract will confirm everyone's responsibilities. For example, we work alongside [Quiddity Health Ltd](#) as a Joint Data Controller to support our marketing and business development activities. For further information, please see their privacy notice [here](#).

ImproveWell may use other partners (such as email services or customer-relationship management systems) for low-risk Personal Data such as names and email address. These providers can change frequently but always meet the legal standards. If you would like more information on these providers, please let us know.



## Will ImproveWell Share Without Informing Me?

Sometimes we will be required by law to share your information and will not always be able to discuss this with you directly.

Examples might be:

- Sharing with the police or tax authorities for the detection or prevention of crime
- Where it is in the wider public interest – to keep the public safe, for example
- To safeguard children or vulnerable adults
- For the purposes of obtaining professional advice (for example, legal advice)
- Because the court has told us we must share

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 customer trends and patterns and managing and improving our commercial and other relationships.



## What are my Information Rights?

Data protection law provides you with a number of rights that ImproveWell is committed to supporting you with.

This includes the right to:

- Request access to your information and request a copy of your information
- Object to the way we use your information
- Withdraw Consent
- Request that your information is corrected or updated
- Request that your information is erased
- Request that the way your information is used is restricted

- Make a complaint
- Have your information transferred to a different provider of similar services to ImproveWell

### Right to Access

You have the right to obtain:



- confirmation that your information is being used, stored or shared by ImproveWell
- a copy of information held about you

If you only require a particular part of your record, tell us and this can reduce the time it takes to provide it.

We will respond to your request within one month of receipt or will tell you when it might take longer.

We are required to validate your identity including the identity of someone making a request on your behalf.

### Right to Object

We collect, use, store and share your information because you have consented, but you do have a right to object to how we use your information.

Our Data Protection Officer will be happy to speak with you about any concerns you have.

### Right to Withdraw Consent

You may contact our Data Protection Officer at [privacy@improvement.com](mailto:privacy@improvement.com) to withdraw consent.

If you withdraw consent, we will anonymise the data and use it for reporting activities only.

### Right to Correction

If information about you is incorrect, you are entitled to request that we correct it.

There may be occasions, where we are required by law to maintain the original information – our Data Protection Officer will talk to you about this and you may request that the information is not used during this time.

We will respond to your request within one month of receipt or will tell you when it might take longer.

### Complaints

You also have the right to make complaints and request investigations into the way your information is used. Please contact our Data Protection Officer or visit the link below for more information. If the participating organisation requires a complaint to be logged with a representative, you may access this Privacy Policy via the ImproveWell App where the representative(s) will be named.

For more detailed information on your rights visit <https://ico.org.uk/for-the-public/>



## Does ImproveWell Use Profiling or Automated Decision Making?

No. ImproveWell does not use technology that makes decisions about you.



## How Does ImproveWell Protect My Information?

ImproveWell is committed to ensuring the security and confidentiality of your information. There are a number of ways we do this:

- Staff receive regular training about protecting and using personal data
- Policies are in place for staff to follow and are regularly reviewed
- We check that only the minimum amount of data is shared or accessed
- We use controlled access to systems, this helps to ensure that the right people are accessing data – people with a ‘need to know’
- We use secure emails and storage which would make it difficult for someone to ‘intercept’ your information
- We report and manage incidents to make sure we learn from them and improve
- We put in place contracts that require providers and suppliers to protect your data as well
- We do not send your information outside of the UK and Ireland; where our data servers are located

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 comes with some risk.

ImproveWell LTD is a company registered in England and Wales, with its servers located in the UK and Ireland, and is subject to data protection laws applicable to the United Kingdom (UK). ImproveWell may be offered to users in the United States or other overseas locations. Information collected from users in the UK or other overseas locations will be stored and processed by ImproveWell in the UK and Ireland.



## Does ImproveWell Collect Information from Children?

As a platform provided to employers or other professional organisations, no part of ImproveWell’s services are directed at persons under the age of 16.

If you are under 16 years of age, then please do not use the App or visit the Site.

ImproveWell does not knowingly collect or maintain Personal Data from persons under 13 years of age.

If ImproveWell learns that Personal Data of persons less than 13 years of age has been collected without verifiable parental consent, then ImproveWell will take the appropriate steps to delete this information. To make such a request, please contact our Data Protection Officer at [privacy@improvement.com](mailto:privacy@improvement.com).



## How Long Does ImproveWell Store My Information?

ImproveWell will retain / store your App data, in identifiable form until you withdraw consent or the contract we have with the participating organisation ends.

When this happens, we will anonymise the data and use it for reporting activities only.

## What happens if you make Changes to this Policy?

Any changes we may make to our Privacy Policy in the future will be posted on our website at [www.improvewell.com](http://www.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.

## Information for Data Subjects in the EU

In accordance with GDPR, your submission of your personal data to ImproveWell constitutes your consent to allow your personal data to be processed by ImproveWell in the United Kingdom (UK). The UK is not a member of the EU and GDPR does not directly apply. However, the UK has worked to implement GDPR and ImproveWell has ensured that there are measures in place to protect your personal data and reduce the risk for EU data subjects. Please see, [How Does ImproveWell Protect My Information](#).

## Contact

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to our Data Protection Officer at [privacy@improvewell.com](mailto:privacy@improvewell.com).