



<b>Document Name</b>	<b>Privacy Notice</b>
<b>Version No.</b>	<b>V3.0</b>
<b>Release Date</b>	<b>May 2021</b>

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## Revision History

The below table provides the revision history for this document. Each revision has an associated date, issue number, and description of the changes and/or content. The document revisions appear in descending order, with the most-recent iteration appearing first in the table.

Date	Version	Description	Author
7/11/19	V2.0	Reformatted to Beyond 360 Group of Companies standard document template	Sarah Burns, DPO
12/05/2021	V3.0	Reviewed. Updated to reflect change to UK GDPR	Sarah Burns, DPO

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## Privacy Notice

Updated May 2021

Beyond360 Ltd is fully committed to compliance with the requirements of the Data Protection Act 2018 and all other data protection legislation currently in force. The legislation applies to anyone processing personal data and sets out principles which should be followed and gives rights to those whose data is being processed.

This privacy notice tells you what to expect us to do with your personal information when you make contact with us or use one of our services.

In this Privacy Notice we'll tell you:

- why we are able to process your information;
- what purpose we are processing it for;
- whether you have to provide it to us;
- how long we store it for;
- whether there are other recipients of your personal information;
- whether we intend to transfer it to another country; and
- whether we do automated decision-making or profiling.

Beyond360 takes its responsibilities seriously and adheres to the Data Protection Principles as listed below.

When processing data we will ensure that it is:

- processed lawfully, fairly and in a transparent way
- processed only for the purpose that the data was collected for
- limited to what is necessary
- accurate and kept up to date
- kept for no longer than is necessary
- kept safe and secure
- only shared with other Organisations who can demonstrate compliance with the regulations

### Our contact details

There are many ways you can contact us, including via our contact us page on our website, post or email as follows:

**Name:** Beyond360 Ltd

**Postal Address:** Clavering House Business Centre, Clavering Place, Newcastle NE1 3NG

**Website:** <https://beyond360.com>

**Email:** [Info@beyond360.com](mailto:Info@beyond360.com)

## **Collecting and processing your personal data**

### **Our role**

Beyond 360 can act as either a Data Controller or Data Processor dependant on the nature of your interaction with us. For example, if you go direct to our website and enquire about any of our services, we will act as a Data Controller. However, if your employer is using our services and give us your data to fulfil a request on their behalf, we act as a Data Processor.

### **How we collect your data and the type of information we collect**

When acting as a data controller we collect the following information from you directly:

- personal data such as your name and contact details (address, email address, telephone number)
- other personal identifiers such as IP Addresses, information about your internet connection, the equipment you use to access the website and usage details.

When acting as a Data processor, your employer will choose what data either they or you input into the Harmony platform. We will process this data which may include:

- Name, date of birth, home address, email address, gender, contact number
- Your personal photograph
- Details relating to your employment such as your job title, employee number, employment location, date of joining
- Your health data and performance data

When you and/ or your employer inputs data to the Harmony Platform, you will be asked to agree to our 'Supplier and Customer' Terms and Conditions.

### **The purpose for collecting and processing it**

The data we collect and process is for one or more of the following reasons:

- When you use our website or to enquire about our services via our website
- Use of the selected modules in the Harmony System
- In fulfilment of the incentive services enabled within the system.

Your data will not be used for automated decision-making or profiling other when used for analytical purposes. In such situations, the data is anonymised meaning you cannot be identified through this means.

### **Lawful bases for processing**

In most cases, the lawful bases or reason(s) for processing your information is in fulfilment of a contract, for example:

- Where you send a query via our website requesting information about our products and services to help you decide whether to enter into a contract with us
- In acceptance of our Terms and Conditions.

### **How we store your information, where and for how long**

We are committed to ensuring that your data is secure. As such we have put in place appropriate technical and organisational measures to safeguard it, including the use of user logins and passwords to the Harmony system, secure cloud-based data storage, encryption, anti-virus software and frequent network vulnerability scanning.

All data entered into our website by you is encrypted and securely stored in the UK and for the duration required to fulfil the request.

All data entered into the Harmony System is stored for the duration of your access and in an encrypted format in data storage centres located as follows:

- UK Customers - UK data storage centre
- US Customers – Central USA data storage centre
- India Customers – Southern India data storage centres

Once your access to the system has ceased, data relating to you will be erased. Some data however may be used for analytical purposes, this will be anonymised and as such will not identify you in any way.

### **Third parties we share your data with**

We use third party organisations to provide elements of our services on our behalf. We have contracts in place with these organisations which means that they cannot do anything with your personal information unless we have instructed them to do so, and where necessary, in line with the instructions from your employer. They will hold it securely for the purposes of and retain it for the period we instruct. The organisations we share data with are:

**Beyond360 website developers** Creativehill Ltd.

### **Harmony platform:**

1. **Our platform developers:** Go Infinity Ltd.
2. **Gift Card or other related incentive prize vendors.** To deliver to you your chosen gift/ prize, we may share your name and postal address and on occasion email address
3. **Other third party websites.** The Harmony platform may also contain links to third-party websites, where this is the case the terms and conditions for that particular website will apply.

We will not share your information with any third parties for the purposes of direct marketing.

## Data Subject Rights

### Your data protection rights

Under UK legislation, you have rights including:

1. Your right of access - You have the right to ask us for copies of your personal information.
2. Your right to rectification - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
3. Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.
4. Your right to restriction of processing - You have the right to ask us to restrict the processing of your information in certain circumstances.
5. Your right to object to processing - You have the the right to object to the processing of your personal data in certain circumstances.
6. Your right to data portability - You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at: [info@beyond360.com](mailto:info@beyond360.com) if you wish to make a request.

### How to complain

Should you not be entirely satisfied with any aspect of how we have used your data, you can also complain to the ICO at the following address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

### Changes to our Privacy Notice

Whenever we make any changes to our Privacy Notice and practices, we will inform you by posting an updated notice on this page and/or by sending you details of the update.

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## Document Approval

<b>Document Name</b>	<b>Data Privacy Notice (Website Version)</b>	
<b>Publication Date</b>	May 2021	
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<b>Prepared by</b>	Sarah Burns, DPO	
<b>Approval</b> (Name & Organization)	Paul Shoker CEO, Beyond360 Ltd	<b>Sign</b>