



The Wellbeing Exchange Privacy and Cookie Policy

1. Introduction

The Wellbeing Exchange take your data protection seriously and is committed to protecting and safeguarding any personal information you share with us. The purpose of this Privacy and Cookie Policy is to explain how we use any personal information we collect about you when you use this website. This notice applies to the services we provide (for example consultancy, coaching and keynote talks) and to our website.

The Wellbeing Exchange Limited is a wellbeing company registered in England, with registered number 14606873. The Wellbeing Exchange Limited's registered office is at Appleton House 25 Rectory Road, West Bridgford, Nottingham, England, NG2 6BE. We (The Wellbeing Exchange Limited) are the 'data controller' of the information you provide to us.

This Privacy Policy describes the types of information we collect from you, how it is used by us, how we share it, how you can manage the information we hold and how you can contact us. Our website does not track usage, the information we hold is provided to us from our 'contact us' page, from consultancy, coaching or other services provided by The Wellbeing Exchange.

It is important that you read and understand this Privacy Notice so that you are aware of how and why we are using your personal information when you use this website.

We may update this Privacy Notice from time to time, so please ensure you regularly check back to review it.

2. Our Contact Details

Name: The Wellbeing Exchange

Address: The Wellbeing Exchange, PO Box 11201, Nottingham, NG2 9YQ.

E-Mail: email@thewellbeingexchange.co.uk

3. The type of personal information we collect

We currently collect and process the following information:

- Personal identifiers and contact details (for example, name, organisation, email, address, and telephone number) given to us from you to provide you with information or services that you request from us, when you have consented to be contacted for that purpose.
- Correspondence – if you contact us, we may keep a record of the correspondence to provide you with the information you request and to assist with customer service.
- Information you have chosen to share with us for us to provide our service to you - this could be anonymised company sickness absence data, health benefits data or other aggregate data provided to us to advise you on your wellbeing strategy (consultancy service) or could be information disclosed verbally by you to us through our coaching



service. This information is held in secure and encrypted form and handled in line with the Information Commissioners Office (ICO) recommendations.

- Interview information – we carry out qualitative organisational surveys (focus groups and interviews) to provide employers with information to improve their approach to workplace wellbeing. Interview data (unless agreed otherwise with prior individual and/or organisational consent) and focus group data is recorded and stored anonymously and reported back to the organisation without information that could identify an individual (with the exception of a legitimate concern for the safety and welfare of an employee).
- Payment information provided to complete any billing or other transactions related to a purchased service. We do not store payment information and invoicing is carried out through third party accounting software (Xero).

We also collect Special Categories of data which we process for the purpose of the services we provide connected to employment and health, Dr Grant being a Chartered Psychologist:

- Mental or physical health conditions
- Biometric data

We take the security of Special Categories of Personal Data and Criminal Convictions Data very seriously. We have administrative, physical and technical safeguards in place to protect Personal Data against unlawful or unauthorised Processing, or accidental loss or damage. We will ensure, where Special Categories of Personal Data are Processed that:

- The Processing is recorded, and the record sets out, where possible, a suitable time period for the safe and permanent erasure of the different categories of data in accordance with our Data Retention Policy.
- Where we no longer require Special Categories of Personal Data for the purpose for which it was collected, we will delete it or render it permanently anonymous as soon as possible.
- Where records are destroyed we will ensure that they are safely and permanently disposed of.

4. How we get personal information and why we have it

The personal information we process is provided to us directly by you for one of the following reasons:

- Information requested on the services we provide.
- Information shared with us to provide a service to you.

When you visit our website we collect information about you that you provide to us when you:

- submit an enquiry by sending us an email or otherwise



- use our email address link to send us an email
- email us to get involved in our work or book a masterclass or keynote talk

We also collect information about your use of our site through the use of cookies (see further below).

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

- Your consent - you can remove your consent at any time. You can do this by contacting email@thewellbeingexchange.co.uk
- We have a legitimate interest – we may use and process your personal information where it is necessary for us to carry out activities for which it is in our legitimate interests as a service provider to do so.
- We have a contractual obligation – this may be a formal contract between us or an agreement in place, with terms offered and accepted for the exchange of services for an agreed fee.
- We have a legal obligation – we may process your personal information to comply with legal requirements. For example, if a court requires us to do so or to enforce or apply our terms and conditions.

5. How we use the personal information we collect

The information provided by you will be processed for legitimate business and/or contractual reasons:

- Respond to your enquiry or provide the services that you have requested
- Send you information that you request from us relating to our products and services
- Act as the basis for any advice we provide
- Carry out our obligations arising from any contracts entered into by you and us
- Provide our ongoing service to you
- From time to time to provide you with information about new and existing The Wellbeing Exchange services. Should you wish that we do not use your personal information for these purposes, please notify us at email@thewellbeingexchange.co.uk

We may also use your site usage information to improve our website, understand how you use our site, and provide more relevant content to you.

We never sell your personal information to any third parties, and you will not receive offers or communications from other companies or organisations as a result of giving your details to us.

The Company will not transfer your personal information to countries outside the European Economic Area. There are adequacy regulations in respect of countries within the EEA, which means that there is an adequate level of protection for your personal data in these countries.



6. Cookies

We collect information about your use of our site through cookies. Cookies are information files stored on your computer, tablet or smartphone that help websites remember who you are and information about your visit. Most major websites use cookies. We collect 'Essential' and 'Analytic' Cookies.

- **Essential Cookies:** These strictly necessary cookies are enabled at all times so that we can save your preferences for cookie settings. Google reCAPTCHA is used for risk analysis when sending a message via the contact form.
- **Analytic Cookies:** Google Analytics is used to collect anonymous information such as the number of visitors to the site. Keeping this cookie enabled helps us improve our website. To opt out of being tracked by Google Analytics across all websites, visit <http://tools.google.com/dlpage/gaoptout>
- **Functional cookies:** These cookies enable embedding YouTube videos on this website. The privacy-enhanced mode of the YouTube embedded player is used so that personally identifiable cookie information is not stored. This mode may set cookies once you click on the YouTube video player, but YouTube will not store personally identifiable cookie information.

For more detail about the cookies used on this website and to change your cookie preferences, click the "Cookie Settings" link button in the website footer. You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting, you may be unable to use certain parts of our website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies. For more information about cookies and how to stop cookies being installed or how to delete existing cookies from your hard drive visit the following website: <https://www.allaboutcookies.org>

7. How we store your personal information

We are committed to keeping your personal information secure. We will take reasonable precautions to protect your personal information from loss, misuse, or alteration.

Your information is securely stored through Microsoft Exchange Server 2019 (who host our email and Microsoft 365 package). No data is stored or collected on The Wellbeing Exchange website. We have put in place appropriate physical, electronic, and managerial processes to secure and safeguard information provided to us.

The length of time we keep your personal data depends on what it is and whether there is an ongoing need to retain it. We will retain your information for as long as we have a relationship with you and for a period of time afterwards where we have an ongoing business need to retain it (for example for accounting and tax purposes, potential or actual disputes, or guidelines issued by relevant data protection authorities). Following that period your data will be deleted.



8. Who we share your personal data with

We may share personal data with our service providers who provide certain business functions for us and act as “processors” of data on our behalf. This is limited to accountancy, regulatory, and legal services for the administration of The Wellbeing Exchange. Information is shared confidentially and solely for the purpose of the administrative action. In addition we may disclose or share your personal data in order to comply with any legal obligation, for the purposes of fraud protection or in order to protect the rights of The Wellbeing Exchange.

9. Third party links on our website

Our website contains links to external websites owned and operated by third parties. We do not accept responsibility or liability for the content of these sites, each will have its own Privacy and Cookie Policy outlining the collection and use of your data when you visit the website.

10. Your data protection rights

Under data protection law, 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 personal 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 personal information in certain circumstances.
5. **Your right to object to processing** - You have the right to object to the processing of your personal information in certain circumstances.
6. **Your right to data portability** - You have the right to ask that we transfer the personal 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 email@thewellbeingexchange.co.uk if you wish to make a request.

11. How to complain

The Company has appointed Dr Judith Grant as the person with responsibility for data protection compliance within the Company. Questions about this policy, or requests for further information, should be directed to email@thewellbeingexchange.co.uk.

If you have any concerns about our use of your personal information, you can make a complaint to us at email@thewellbeingexchange.co.uk.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:



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

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

12. Additional Information

This Policy was last updated and reviewed on the 24 April 2023.