

## **Zumos Wellbeing - Privacy Policy – 2018**

At Zumos Wellbeing Ltd we are committed to protecting your privacy. Our Privacy Policy applies to our websites.

Our Privacy Policy governs our data collection, processing, and usage practices. It also describes your choices regarding the use, access, and correction of your personal information. By using our website, you consent to the data practices described in our Privacy Policy. If you do not agree with the data practices described in our Privacy Policy, you should not use our website.

### **1. Important Information**

#### **1.1. Changes to our Privacy Policy**

We may update our Privacy Policy from time to time by posting a new version online. You should check this page occasionally to review any changes. If we make any material changes we will notify you by posting the revised Privacy Policy on our website. This helps you to always be aware of what information we collect, how we use it and under what circumstances, if any, it is disclosed. Your continued use of our website - and/or continued provision of Personal Information to us - will be subject to the terms of the then-current Privacy Policy.

### **2. Contact Us**

If you have any questions about our Privacy Policy or our treatment of the information you provide us, please contact us via email: [gary.siva@zumos.co.uk](mailto:gary.siva@zumos.co.uk)

#### **2.2. Zumos Wellbeing Ltd Websites**

We use our website to build webpages that people can visit to do things like; learn more about themselves, learn mindfulness techniques, measure and build resilience, find expertly sourced first step help on a wide range of important and sensitive topics. The information collected is used, disclosed and protected by us according to our privacy policies, and as required by law. We are responsible for allowing the correction, deleting or updating of information that you have supplied, or we have collected from your use of our website. If requested to remove data, we will respond within a reasonable timeframe.

#### **2.3. "Sensitive Information"**

Our website does not collect or store sensitive information such as; credit or debit card numbers, personal financial account information, passport numbers, driver's license numbers, employment, financial or health information or similar personal identifiers. However, i) Primary and Secondary School parts of our service both use racial or ethnic origin, gender, ii) Primary also uses first and second names in order to provide school demographic management data for Senior Leadership and Pastoral teams, school counsellors, Headteachers, Child Protection Officers, SENCOs, CAMHS etc.

## **3. Information We Collect**

### **3.1. When You Visit Our Website**

You are free to explore our website without providing any information about yourself. When you visit our website, fill one of our forms or subscribe to one of our Services, we may request that you provide some Personal Information about yourself, if you are a Primary School we will provide a template of the information needed. We collect Navigational Information and anonymised usage data.

### **3.2. "Personal Information"**

This refers to any information that you voluntarily submit to us and that identifies you personally, including contact information, such as your name, e-mail address, company name, address, phone number, and other information about yourself, your business, staff or pupils. Personal Information can also include information about any transactions, both free and paid, that you enter into on our website, as well as information about you or your organisation that is available on the Internet, such as from Facebook, LinkedIn, Twitter, Instagram and Google, or publicly available information that we acquire from service providers or Government websites such as the Department for Education.

### **3.3. "Navigational Information"**

This refers to information about your computer and your visits to our website, such as your IP address, geographical location, browser type, referral source, the length of the visit and pages viewed. Please see the "Navigation Information" section below.

### **3.4. Payment Information**

We collect and process payment information from you when you register for our paid for services, including debit or credit card numbers and billing information, using third-party Payment card Compliance Industry (PCI) - compliant service providers, specifically PayPal. Except for this, we do not collect such Sensitive Information from you. The information you provide is collected and processed by the third-party application, we do not have direct access to this information.

### **3.5. Information About Children**

We only request information about children for schools using our Primary School service(s). Any information about Primary School age children is anonymised for viewing by other users such as; Public Health, CCGs, CAMHS, LEAs, Universities and similar organisations.

## **4. How We Use Information We Collect**

### **4.1. Compliance with Our Privacy Policy**

We use the information we collect only in compliance with our Privacy Policy. Customers who subscribe to our Subscription Services are obligated through our agreements with them to comply with our Privacy Policy.

## **4.2. Ownership of data, Sale of Personal Information**

Our guiding principles are: i) You own the information that you provide to use the service, ii) Zumos Wellbeing Ltd owns information generated by its website and processes.

We will never sell your Personal Information to any third party.

## **4.3. Use of Personal Information**

In addition to the uses identified elsewhere in our Privacy Policy, we may use your Personal Information to:

- (a) improve your browsing experience by personalising our website and to improve the Subscription Service;
- (b) send information to you which we think may be of interest to you by post, email, or other means;
- (c) send you marketing communications relating to our business or the businesses of carefully-selected third parties which we think may be of interest to you, and
- (d) provide other companies with statistical information about our users -- but this information will not be used to identify any individual user. We anonymise information about people who use our service.

We may, from time to time, contact you on behalf of external business partners about a particular offering that may be of interest to you. In those cases, we do not transfer your unique Personal Information to the third party. In addition, we may share data with trusted partners to contact you based on your request to receive such communications, help us perform statistical analysis, or provide customer support. Such third parties are prohibited from using your Personal Information except for these purposes, and they are required to maintain the confidentiality of your information.

## **4.4. Use of Navigational Information**

We use Navigational Information to operate and improve our website and its Subscription Services. We may also use Navigational Information alone or in combination with Personal Information to provide you with personalised information about our website.

## **4.5. Customer Testimonials and Comments**

We post customer testimonials and comments on our website, which may contain Personal Information. We obtain each customer's consent via email prior to posting the customer's name and testimonial.

## **4.6. Use of Credit Card Information**

If you give us credit card information, we use it solely to check your financial qualifications and collect payment from you. We use a third-party service provider to manage credit card processing. This service provider is not permitted to store, retain, or use the information you provide except for the sole purpose of credit card processing on our behalf.

## **4.7. Security of your Personal Information**

We use a variety of security technologies and procedures to help protect Personal Information from unauthorised access, use or disclosure. We secure the Personal Information provided on computer servers in a controlled, secure environment, protected from unauthorised access, use or disclosure. When sensitive Personal Information (such as a credit card number and/or geo-location data) is collected on our website and/or transmitted to other websites, it is protected through the use of encryption, such as the Secure Socket Layer (SSL) protocol.

If you have any questions about the security of your Personal Information, you can contact us via our website or by email: [gary.siva@zumos.co.uk](mailto:gary.siva@zumos.co.uk)

## **4.8. Social Media Features**

Our Websites include Social Media Features, such as the Facebook Like button and Widgets, such as the Share This button or interactive mini-programs that run on our sites. These features may collect your IP address, which page you are visiting on our sites, and may set a cookie to enable the feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our website. Our Privacy Policy does not apply to these features. Your interactions with these features are governed by the privacy policy and other policies of the companies providing them.

## **4.9. External Websites**

Our website provides links to other websites. We do not control and are not responsible for, the content or practices of these other websites. Our provision of such links does not constitute our endorsement of these other websites, their content, their owners, or their practices. Our Privacy Policy does not apply to these other websites, which are subject to any privacy and other policies they may have.

## **4.10. Retention of Personal Information**

We retain Personal Information that you provide us as long as we consider it potentially useful in contacting you about the Subscription Service or our other services, or as needed to comply with our legal obligations, resolve disputes and enforce our agreements, and then we securely delete the information. We will delete this information from the servers at an earlier date if you so request, as described in "Opting Out and Unsubscribing" below. If you provide information to our customers as part of their use of the Subscription Service, our customers decide how long to retain the personal information they collect from you. If a customer terminates its use of the Subscription Service, then we will provide the customer with access to all information stored for the customer by the Subscription Service, including any Personal Information provided by you, for export by the customer according to our agreement with our customer. After termination, we may, unless legally prohibited, delete all customer information, including your Personal Information, from the Subscription Service.

## **4.11. International Transfer of Information**

To facilitate our global operations, we may transfer and access Personal Information from around the world, including the United States. Our Privacy Policy shall apply even if we transfer Personal Information to other countries.

## **4.12. Corporate Events**

If we (or our assets) are acquired by another company, whether by merger, acquisition, bankruptcy or otherwise, that company would receive all information gathered by Zumos Wellbeing. In this event, you will be notified via email and/or a prominent notice on our website of any change in ownership, uses of your Personal Information, and choices you may have regarding your Personal Information.

## **4.13. Compelled Disclosure**

We reserve the right to use or disclose your Personal Information if required by law or if we reasonably believe that use or disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, comply with a law, court order, or legal process.

# **5. Navigational Information**

## **5.1. Cookies**

Zumos Wellbeing uses cookies or similar technologies to analyse trends, administer our website, track users' movements around our website, and to gather demographic information about our user base as a whole.

We use "cookies" to help you personalise your online experience. A cookie is a text file that is placed on your hard disk by a Web server. Cookies are not used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you and can only be read by a Web server in the domain that issued the cookie to you. One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the Web server that you have returned to a specific page. For example, if you personalise pages on our website or register for the Subscription Service, a cookie helps us to recall your specific information on subsequent visits. When you return to our website, the information you previously provided can be retrieved, so you can easily use the customised features.

You have the ability to accept or decline cookies. Most Web browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of our website. Zumos Wellbeing keeps track of the pages you visit on our website to determine what portion of our website is the most popular or most used. This data is used to deliver customised content.

## **5.2. Log Files**

We may collect demographic information, such as your postcode, age, gender, preferences, interests, and favourites using log files that are not associated with your name or other personal information. There is also information about your computer hardware and software that is automatically collected by us. This information can include your IP address, browser type, domain names, Internet Service Provider (ISP), the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system, clickstream data, access times and referring website addresses. This information is used by Zumos Wellbeing to provide general statistics regarding use of our website.

## **6. Opting Out and Unsubscribing**

### **6.1. Reviewing, Correcting and Removing Your Personal Information**

Upon request, Zumos Wellbeing will provide you with information about whether or not we hold any of your Personal Information. If you provide us with your Personal Information, you have the following rights with respect to that information:

- To review the user information that you have supplied to us
- To request that we correct any errors, outdated information, or omissions in user information that you have supplied to us
- To request that your user information not be used to contact you
- To request that your user information be removed from any solicitation list that we use
- To request that your user information be deleted from our records
- To opt out of being solicited by Zumos Wellbeing or third parties

To exercise any of these rights, please contact us within a reasonable timeframe and notify us of the action you would like to be taken with regards to your Personal Information.

### **6.2. Anti-Spam Policy**

The Zumos Wellbeing Acceptable Use Policy, applies to our website and to our customers and, among other things, prohibits use of our website to send unsolicited commercial email in violation of applicable laws, and requires the inclusion in every email sent using the Subscription Service of an "opt-out" mechanism and other required information.

### **6.3. To Unsubscribe From Our Communications**

You may unsubscribe from our marketing communications by clicking on the "unsubscribe" link located on the bottom of our e-mails, or by contacting us at: [gary.siva@zumos.co.uk](mailto:gary.siva@zumos.co.uk).