

Wellness Cloud EAP Services – Description of Processing

1.1 Scope

To administer and provide the service effectively for the Employer and its Employees. This involves storing and processing demographic data, employee identifier data and technical data and relating to Employees of the Employer.

1.2 Nature

The nature of the Processing is the collection and presentation of Employee Personal Data through four methods:

1. The importing of Employee Personal Data automatically to the Software.
2. The input of Employee Personal Data by Employees directly onto the Software or by corresponding with the Provider by post, phone, email or otherwise;
3. The automatic collection of technical data about Employees' equipment, browsing actions and patterns;
4. the receipt of Employee Personal Data from analytics providers such as Google.

All Employee Personal Data is held securely on the Software and used to administer the benefits and services to the Employer and its Employees. This involves storing the Employee Personal Data on behalf of the Employer, and to the Employee (their own record) for the duration of the Agreement.

The Employee Personal Data is used to issue communications to Employees through digital and printed matter, to present information to the Employee and to allow the services to be provided to the Employer.

No Employee Personal Data is changed, manipulated or modified as part of the Processing unless initiated by the Provider on behalf of the Employer or the Employee, subject to the Provider's obligations under Data Protection Legislation. If Employee Personal Data is changed, an audit trail is created against every data item that can be interrogated by the Provider on behalf of the employer

if requested. The audit trail includes the time of the change, the nature of the change and the user making the change, but it will not contain any Employee Personal Data.

Access to Employee Personal Data on the Software is restricted through the use of policies that are applied for all users to proactively prevent attacks such as brute-force password retrieval.

This is achieved through password expiries, maximum wrong password attempts, temporary account disabling and proactive systems' monitoring. Data such as passwords are encrypted with bcrypt algorithms and users have no access to decrypted information at any time.

1.3 Purpose of processing

The purpose of processing the Employee Personal Data is to provide the Products and Services to the Employer and to administer benefits for the Employees of the Employer.

This includes processing the Employee Personal Data to:

- Inform Employees about benefits by sending them digital and printed communications notifying them that they are available;
- Register Employees for a Service;
- Manage the Provider's relationship with the Employee;
- Enable the Employee to take part in a prize draw, competition or complete a survey;
- Administer and protect the Provider and the Site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data);
- Deliver relevant website content and measure or understand the effectiveness of communications;
- Use data analytics to improve the Site, the Products and Services, communications, the Employee relationships and experiences;
- Make relevant suggestions and recommendations to the Employee about goods or services that may be of interest to you

1.4 Duration of the processing

The processing will start when the Employer imports the Employee Personal Data into the Software or when Employees starts entering Employee Personal Data.

The duration of the processing will continue for the period under which the Employer is entitled to utilise the benefits services from the Provider.

The Employee Personal Data will be retained for the duration of the supply of the Products and Services to the Employer and in accordance with paragraph 2.4.10 of Schedule 2.

Personal Data will be deleted or destroyed in accordance with the Provider's obligations under Data Protection Legislation and its data retention policy, a copy of which can be provided on request.

Where Employee Personal Data is destroyed, a Destruction Certificate will be issued.

1.5 Types of Personal Data

The types of Personal Data being held are:

- **Identity Data** includes first name, last name, username or similar identifier, Employee Number, NI Number, date of birth and gender.
- **Contact Data** includes address, email address and telephone numbers.
- **Profile Data** includes your username and password, orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use the Site, products and services.
- **Communications Data** includes your communication preferences.

The Provider also collects, uses and shares with third parties aggregated data such as statistical or demographic data. Aggregated data could be derived from an Employee's personal data but is not considered personal data in law as this data will not directly or indirectly reveal a person's identity.

For example, the Provider may aggregate Usage Data to calculate the percentage of users accessing a specific Site feature. However, if combining or connecting aggregated data with personal data so that it can directly or indirectly identify a person, the Provider treats the combined data as Personal Data.

1.6 Categories of Data Subject

The Employer Personal Data relates to Employees of the Employer.