



Privacy Policy

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK General Data Protection Regulation (UK GDPR).

Key terms

It would be helpful to start by explaining some key terms used in this policy:

We, us, our	Infinite Choice Media Limited trading as 4Sight – for GDPR purposes - Controller
Personal data	Any information relating to an identified or identifiable individual
Special category personal data	Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership Genetic and biometric data (when processed to uniquely identify an individual) Data concerning health, sex life or sexual orientation
Data subject	The individual who the personal data relates to
Secondary Controller	Your employer has engaged our services to collate information and feedback from you and your colleagues for the purpose of improving the employee experience and to provide appropriate signposting to your employee benefits

Personal data we collect about you

We may collect and use the following personal data about you:

- your name and contact information, including email address and telephone number and company details;
- your gender;
- location data;
- our services involve collating information about for you are feeling in terms of your wellbeing including health questions such as your family medical history and some specific health data;
- we will ask you about your views on your financial affairs and your general wellbeing and your work levels and pressures within the workplace.

We collect and use this personal data to provide you with recommendations of support provided by the Secondary Controller and third parties engaged by the Secondary Controller. We provide anonymised feedback to the Secondary Controller to enable them to improve the employee experience and to provide support to you.

How your personal data is collected

We collect this data from you further to you logging in to our web portal via the link sent to you by your employer. However, we may also collect information from cookies on our website—for more information on our use of cookies, please see our cookie policy which is available on our website.

How and why we use your personal data

Under data protection law, we can only use your personal data if we have a proper reason, for example:

- where you have given consent;
- to comply with our legal and regulatory obligations;
- for the performance of a contract with you or to take steps at your request before entering into a contract; or
- for our legitimate interests or those of a third party.

The information that you provide on our website portal is voluntary and we will only collect information that you provide by your consent by way of answering the various questionnaires. We use this data to provide anonymised feedback to the Secondary Controller to assist them to provide adequate support for you and your colleagues.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own.

The table below explains what we use your personal data for and why.

What we use your personal data for	Our reasons
Providing services to you by way of our contract with the Secondary Controller	To perform our contract with the Secondary Controller to improve your employee experience
Preventing and detecting fraud against you or us	For our legitimate interests or those of a third party, i.e. to minimise fraud that could be damaging for you and/or us
Ensuring business policies are adhered to, e.g. policies covering security and internet use	For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service to you
Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third party, i.e. to protect trade secrets and other commercially valuable information To comply with our legal and regulatory obligations
Statistical analysis to help manage the Secondary Controller's business, e.g. in relation to employee satisfaction	To perform our contract with the Secondary Controller for the benefit of you and your colleagues
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	To comply with our legal and regulatory obligations For our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you

What we use your personal data for	Our reasons
	To ensure the performance of a contract with your Secondary Controller

Where we process special category personal data, we will also ensure we are permitted to do so under data protection laws, for example:

- we have your explicit consent;
- the processing is necessary to protect your (or someone else's) vital interests where you are physically or legally incapable of giving consent; or
- the processing is necessary to establish, exercise or defend legal claims.

Who we share your personal data with

We routinely share personal data with:

- Secondary Controller (your employer) but only on the basis this is anonymised. Although we will hold your responses to the surveys on the website portal, this will not be shared with your employer in such a manner that will identify you.
- other third parties we use to help us run our business, e.g. our website and software providers;
- third parties we use to keep the information secure, e.g. Amazon Web Services.

We only allow our service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data.

We may also need to:

- disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations;
- share some personal data with other parties, such as potential buyers of some or all of our business or during a restructuring—usually, information will be anonymised but this may not always be possible.

If you would like more information about who we share our data with and why, please contact us (see '**How to contact us**' below).

Where your personal data is held

Personal data may be held at our offices and those of our third party agencies, service providers, representatives and agents as described above, but these are all held electronically and with encrypted storage and access controls (see above: '**Who we share your personal data with**').

How long your personal data will be kept

We will keep your personal data for such period as we continue to provide services to you and the Secondary Controller. Thereafter, we will keep your personal data for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly;
- to keep records required by law.

We will not keep your personal data for longer than necessary, namely when the contractual relationship with the Secondary Controller ends.

When it is no longer necessary to keep your personal data, we will delete it.

Transferring your personal data out of the UK

To deliver services to you, it is sometimes necessary for us to share your personal data outside the UK, e.g.:

- with your and our service providers located outside the UK;
- if you are based outside the UK;

Under data protection law, we can only transfer your personal data to a country or international organisation outside the UK where:

- the UK government or, where the EU GDPR applies, the European Commission has decided the particular country or international organisation ensures an adequate level of protection of personal data (known as an 'adequacy decision');
- there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for data subjects; or
- a specific exception applies under data protection law.

Adequacy decision

We may transfer your personal data to certain countries, on the basis of an adequacy decision. These include:

- all European Union countries, plus Iceland, Liechtenstein and Norway (collectively known as the 'EEA');
- Gibraltar; and
- Andorra, Argentina, Canada, Faroe Islands, Guernsey, Israel, Isle of Man, Japan, Jersey, New Zealand, Switzerland and Uruguay.

The list of countries that benefit from adequacy decisions will change from time to time. We will always seek to rely on an adequacy decision, where one exists.

Other countries or international organisations we are likely to transfer personal data to do not have the benefit of an adequacy decision. This does not necessarily mean they provide poor protection for personal data, but we must look at alternative grounds for transferring the personal data, such as ensuring appropriate safeguards are in place or relying on an exception, as explained below.

Transfers with appropriate safeguards

Where there is no adequacy decision, we may transfer your personal data to another country or international organisation if we are satisfied the transfer complies with data protection law, appropriate safeguards are in place, and enforceable rights and effective legal remedies are available for data subjects.

The safeguards will usually include using legally-approved standard data protection contract clauses.

To obtain a copy of the standard data protection contract clauses and further information about relevant safeguards please contact us (see '**How to contact us**' below).

Transfers under an exception

In the absence of an adequacy decision or appropriate safeguards, we may transfer personal data to a third country or international organisation where an exception applies under relevant data protection law, e.g.:

- you have explicitly consented to the proposed transfer after having been informed of the possible risks;
- the transfer is necessary for a contract in your interests, between us and another person; or
- the transfer is necessary to establish, exercise or defend legal claims.

We may also transfer information for the purpose of our compelling legitimate interests, so long as those interests are not overridden by your interests, rights and freedoms. Specific conditions apply to such transfers and we will provide relevant information if and when we seek to transfer your personal data on this ground.

Further information

If you would like further information about data transferred outside the UK, please contact us (see '**How to contact us**' below).

Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal data
Rectification	The right to require us to correct any mistakes in your personal data
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal data in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object: —at any time to your personal data being processed for direct marketing (including profiling); —in certain other situations to our continued processing of your personal data, e.g. processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, please contact us (see '**How to contact us**' below) or see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights](#).

If you would like to exercise any of those rights, please:

- email, call or write to us—see below: '**How to contact us**'; and
- provide enough information to identify yourself (e.g. your full name, address and employer) and any additional identity information we may reasonably request from you;
- let us know what right you want to exercise and the information to which your request relates.

Keeping your personal data secure

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

We additionally use encryption technologies and access controls on all of our databases, and have ensured any third parties who assist us have the same security measures.

How to complain

Please contact us if you have any query or concern about our use of your information (see below '**How to contact us**'). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with the Information Commissioner. The Information Commissioner may be contacted at <https://ico.org.uk/make-a-complaint> or telephone: 0303 123 1113.

Changes to this privacy policy

This privacy notice was published on 17 May 2021 and last updated on 30 July 2021

We may change this privacy notice from time to time—when we do we will inform you via our website and email.

How to contact us

You can contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details are shown below:

Our contact details
Meadow View, Huish, Okehampton, Devon EX20 3EL hello@4-sight.co.uk 07709 200501