

GDPR Privacy Policy

GDPR Privacy Statement,

Whiss is a service from Life & Progress. Life & Progress is the trading name of Life and Progress Limited (Company Registration No. 09966183) Registered office C/o, Pentlands Accountants, 3 & 4 Pegasus House, Pegasus Court, Olympus Avenue, Warwick, CV34 6LW. Operating office Four The Cobalt Centre, Siskin Parkway East, Middlemarch Business Park, Coventry, West Midlands, CV3 4PE.

Hereafter referred to as “**Life & Progress**”. The General Data Protection (GDPR) imposes new legal requirements on the processing of personal data by companies located in or doing business in the European Union (EU). Life & Progress operates primarily but not exclusively as an Intermediary business working in partnership with select Service Providers (Suppliers) whereby we act as both the Data Controller and/or the Data Processor in conjunction with the respective Service Provider (Supplier), and we are committed to protecting the rights of all individuals, groups, and organisations and acknowledge that any personal data that is handled by Life & Progress will be processed in accordance with Data Protection Act 2018 and the General Data Protection Regulation (GDPR).

For the purposes set out in this privacy statement and in respect of the Information Commissioner (ICO) that requires us to advise you that, information, including personal information relating to you or anyone else to be covered by a service provided directly or indirectly via Life & Progress (“Personal Data”), will be collected and processed by us and/or on its behalf by our Service Providers (Suppliers). This data will be provided by you, or any other person you may appoint to provide us with information. You will either be completing application forms or answering questions we ask you, in order to provide the required information. We may also obtain information from other sources that are readily available in the public domain such as the Internet of Things (IoT), Social Media, Press etc.

Data Generated by us:

We and any trusted service partners working for us may generate personal data relating to you, including in connection with responding to and dealing with any enquiry, application for services, information request, suggestion or complaint; or in performing any services, event or other contracts with you; or through the analysis of your personal data or data gained from you. Our trusted third party EAP partners may record telephone calls with you.

Data you provide us:

Your personal data will include data you provide (or later amend), whether: from correspondence with you; verbally to us over the phone or in-person; by filling in any field or form on a website; by filling in any printed form we provide you with; by e-mail; from documents you provide use with; and from updates to any information you provide from time to time. This includes but not limited to when you: register or subscribe for any services, register for an event, or make an enquiry for other services whether in person, by phone, through our website or otherwise; send us your comments or suggestions; subscribe to any newsletter or other publication; and request information, including brochures.

Managing Director of Life & Progress (Mr. Brian Taylor) is the acknowledged Controller of this Personal Data and will ensure the process your Personal Data in accordance with this Privacy Notice, which is available upon request at any time, in writing to: FAO The GDPR Representative, Life & Progress, Four The Cobalt Centre, Siskin Parkway East, Middlemarch Business Park, Coventry, West Midlands, CV3 4PE or telephone 024 7651 6087 or via email gdpr@lifeandprogress.co.uk

Working with Service Providers (Suppliers)

Life & Progress undertakes to only work with Service Providers (Suppliers) that equally comply with the requirements of the Information Commissioner (ICO) and the General Data Protection Regulations (GDPR). A list of our respective Service Providers (Suppliers) and copies of their GPRP Privacy Statements, KPIs and other such information are available upon request at any time, in writing to: FAO The GDPR Representative, Life & Progress, Four The Cobalt Centre, Siskin Parkway East, Middlemarch Business Park, Coventry, West Midlands, CV3 4PE or telephone 024 7651 6087 or via email gdpr@lifeandprogress.co.uk

Who we collect Data from:

Life & Progress collects data from but may not be limited to Human Resources (HR), Personnel Officers, Line-Managers, Company Directors, Service Providers (Suppliers), Occupational Health Practitioners, Client Delegates.

How will Data be collected:

Life & Progress will collect Data via email, post, and verbal communications (telephonic communications). All telephone calls to the offices of Life & Progress are recorded for training and development purposes.

Life & Progress facilitates the implementation of the Employee Assistance Programme (EAP) service, and/or with access to mental health training and/or related support services. For the purposes of delivering EAP services, Life & Progress (Intermediary) is a Whitelabel working in partnership with an EAP Service Provider (Supplier). We also facilitate service access by way of referral to other third-party partners for but not limited to Day-1 Absence Management, Occupational Health (OH) Services, G.P. Helpline, Health Assessments, Health & Fitness APPs, Health Insurances and/or Employee Benefits.

Life & Progress will collect corporate/organisational Data for the purposes of setting-up client Contracts (Service Level Agreements/SLAs) and for enabling Life & Progress to account management service(s) throughout the life of the Contract/SLA, and for assisting in the process of customer enquiries, customer queries, complaints and/or any other customer request.

IMPORTANT

- Your personal data will be retained for no longer than is necessary for the purpose for which it was obtained.
- If at any point in the future we need to amend this policy, every effort will be made to make you fully aware.

At all times we will endeavour to hold your Data on servers within the UK, or within the European Economic Area (EEA). Where we share your information with other Data Controllers, they must also agree to hold your Data within the EEA. However, in the unlikely event your data is to be held in any other geographical area we ensure that:

- Data Controllers do not do so without our prior written authority and
- An appropriate transfer agreement is put in place to protect your personal data

Your Acknowledgement of this Statement (Notice) and your rights

Rights Under the General Data Protection Regulation (GDPR)

1. Right to Be Informed

The General Data Protection Regulation sets out the information we must provide to you about your Data. All of the information we are required to give you is contained within this Privacy Notice. If you do not understand any part of this, you should contact us immediately and we will be happy to explain it to you.

2. Right of Access

You have the right to access (SAR) and obtain a copy of the Personal Data, and any supplementary information that we hold about you to enable you to verify the lawfulness of the processing carried out. This will be provided free of charge unless your request is unfounded, excessive, or repetitive, and the information will be sent to you within 30 days of your request being received. We may need to extend the time to respond by a further two months if the request is complex; however, if this is the case then we will inform you within one month of receiving your request and explain why the extension is necessary. If we refuse your request, you have the right to complain to the ICO.

3. Right to Rectification

You have the right to request that we correct any inaccuracies in the Personal Data we

hold about you. This will be corrected within one month. If we are unable to correct the inaccuracy, you have the right to complain to the ICO.

4. **Right to Erasure**

You have the right to request that we erase your Personal Data. For example, you may exercise this right in the following circumstances:

- your Personal Data is no longer necessary in relation to the purposes for which they were collected or otherwise processed by us;
- you withdraw consent and no other legal ground permits the processing;
- you object to the processing and there are no overriding legitimate interests for the processing;
- your Personal Data was unlawfully processed; or
- your Personal Data must be erased for compliance with a legal obligation.

We refuse the right to delete your information when it falls within our data retention period as stated below, as this data may be required to exercise or defend litigation in the event of a claim whether covered or not by the insurance policy. If you do not agree with this, you have the right to complain to the ICO.

5. **How long we Retain your Data**

Your personal data will be retained for no longer than is necessary for the purpose for which it was obtained:

- Where applicable, we retain your Personal Data for as long as your service cover (insurance policy); however, we will permanently delete data which becomes out of date after 24 months.
- After you cease being a client of Life and Progress Ltd, we will permanently delete your data after 36 months.
- If we collect data from you for quotation purposes but you do not become a Life & Progress client, then we will delete your data after 24 months, providing quotation(s) are valid with us for up to 24 months thereafter.

6. **Right to Restrict Processing**

You have the right to restrict our processing of your Personal Data where any of the following circumstances apply, although we will still be allowed to store it:

- where you feel that the Personal Data which we hold about you are not accurate. Processing will be restricted until you verify the accuracy of the information;
- where the processing is unlawful, and you do not want your Personal Data to be erased and request the restriction of its use instead;

- where we no longer need to process your Personal Data, but the data may be required to establish, exercise, or defend a legal claim;
- where you have objected to our processing of your Personal Data pending the verification of whether or not our legitimate business interests override your interests, rights, and freedoms.

Where you exercise your right to restrict our processing of your Personal Data, we will only continue to process it in accordance with the requirements of this policy or our legal obligations.

7. Right to Data Portability

You have a right to receive and transfer the Personal Data that we hold about you. This only applies to:

- personal data you have provided to us;
- where the data was processed by you giving us your individual consent or for the performance of a contract;
- and where processing was carried out by automated means.

Where you make such a request, this will be provided in a secure, structured, commonly used, machine-readable format such as a CSV file or PDF. This will be completed within one month of us receiving your request.

8. Right to Object to Processing

In certain circumstances, you have a right to object to our processing of your Personal Data:

- Where we have processed it as a legitimate interest (including profiling);
- Direct Marketing (including profiling);
- Processing for scientific/historical research and statistics.

We will still be able to process your Personal Data where:

- We can demonstrate compelling legitimate grounds for us to process your Personal Data which override your interests, rights, and freedoms;
- The processing is for the establishment, exercise, and defence of legal claims.

An individual can object verbally or in writing by contacting The GDPR Representative, Life & Progress, Four The Cobalt Centre, Siskin Parkway East, Middlemarch Business Park, Coventry, West Midlands, CV3 4PE or telephone 024 7651 6087 or via email gdpr@lifeandprogress.co.uk.

9. Right to Object to Automated Decision-Making Including Profiling

You have a right not to be subjected to decisions being made solely by automated means without any human involvement. This might be the case where quotations are obtained online, or we are unable to speak to you about a contract renewal. We will still be able to carry out this type of decision-making where:

- It is necessary to enter into or for the performance of a contract (such as a contract of insurance), which is the main reason we would use this type of decision-making; or
- You have given your explicit consent for us to do so.

If we have not heard otherwise, we will assume you wish to renew your contract rather than assume you wish to lapse a scheme. We will only process data in the way you would expect it to be used, and you will be entitled to have a person from our firm review the decision so that you can query it and set out your point of view and circumstances to us.

10. Right to Withdraw Consent

Where the legal basis of consent has been used, you have the right to withdraw that consent at any time.

If you would like to exercise any of your rights detailed above, please contact The GDPR Representative, Life & Progress, Four The Cobalt Centre, Siskin Parkway East, Middlemarch Business Park, Coventry, West Midlands, CV3 4PE or telephone 024 7651 6087 or via email gdpr@lifeandprogress.co.uk for GDPR enquiries.

You may raise any concerns about Life & Progress processing of your Personal Data with the Information Commissioner Office on <https://ico.org.uk/>

Changes to this Statement (Notice)

We may amend this notice on occasion, in whole or part, at our sole discretion. Any changes to this notice will be effective immediately upon sending the revised notice to you by e-mail or post. If at any time we decide to use your Personal Data in a manner significantly different from that stated in this notice or otherwise disclosed to you at the time it was collected, we will notify you by e-mail or post and you will have a choice as to whether or not we use your information in a new manner. If you have questions or concerns about this notice, please contact The GDPR Representative, Life & Progress, Four The Cobalt Centre, Siskin Parkway East, Middlesbrough Business Park, Coventry, West Midlands, CV3 4PE or telephone 024 7651 6087 or via email gdpr@lifeandprogress.co.uk

Information about or provided by another person

Where your information for your policy has been provided to us by another person, we will send you a copy of this privacy notice directly to you, where we have your address, within one month of your policy being taken out. If we do not have/are unable to hold your address for any reason, we will send a copy of this to the person arranging the insurance with instructions to pass this to you within one month. Where you have taken out a policy and provided us with information about another person, e.g. an additional person to your healthcare insurance particularly where health conditions have been disclosed, it is unlikely we will have their address, and therefore you must provide them with a copy of this Privacy Notice so that they will know how their data is being used. Additional copies can be supplied on request.

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