

# **Privacy Policy**

Last updated: 23<sup>th</sup> August 2022

Welcome to the UJJI LTD's privacy policy.

UJJI LTD (collectively referred to as "we", "us" or "our" in this privacy policy) are committed to protecting and respecting your privacy. This privacy policy will inform you as to how we look after your personal data when you visit our website ("Website"), use our platform or app ("App") or interact with us by any other means (regardless of where you contact us from) and tell you about your privacy rights and how the law protects you.

## **1. Important information and who we are**

### **1.1 Purpose of this privacy policy**

This privacy policy aims to give you information on how UJJI LTD collects and processes your personal data through your use of our Website and App, including any data you may provide through this Website when you request a demo, sign up to our newsletter, apply for our product and services, contact us to obtain more information about us, or simply use our app.

Neither this website nor the App are intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

### **1.2 Controller**

UJJI LTD is the controller and responsible for your personal data for purpose of the data protection legislation.

We have appointed a Chief Operating Officer (COO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this policy or our privacy practices, including any requests to exercise your legal rights, please contact the COO using the details set out below.

privacy@ujji.co.uk

### **1.3 Changes to this privacy policy**

We may review this privacy policy from time to time and we will notify you of any changes by uploading the new version of it on our Website and App. We will send you an e-mail or post an

update notice on our Website and App so that you become aware of the updated version of this policy. The “Last updated” date at the top of this policy will also be adjusted accordingly.

You are advised to review this privacy policy periodically for any changes. Changes to this policy are effective when they are posted on our Website and App.

#### **1.4 Your duty to inform us of changes**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

#### **1.5 Third-party links**

This Website or App may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Website or App, we encourage you to read the privacy policy of every website you visit.

### **2. The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, username or similar identifier, gender and date of birth.
- **Contact Data** includes email address only.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access the Website or App. This may also include information about your visit, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.
- **Behavioural Data** Inferred or assumed information relating to your behaviour, interests and preferences, based on your online activity. We may use this information to assess the popularity of our series and tools, and also to tailor the experience our users receive by ensuring that content they enjoy is easily accessible to them.
- **Usage Data** includes information about how you use our Website or App, products and services.

- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

### **Special Categories of Personal Data**

We do not intentionally collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Neither do we collect any information about criminal convictions and offences.

However, there are areas in UJJI platform where you will be able to input free text in order to track your own mood or behaviour change (**User-Generated Content**). Such content may be provided, for instance, when you play games, take self-assessments, complete surveys, tasks and daily check-ins and/or upload images. User-Generated Content may We will never specifically ask for Special Category of Personal Data to be inputted therein. However to the extent your User-Generated Content contains Special Category of Data, we will treat such data in accordance with this policy.

### **Aggregated Data**

We may collect or create aggregated and/or anonymized data about you, which though could be derived from your personal information it is **not** considered personal information in law as such data will not directly or indirectly reveal your identity. This data is used for industry and market analysis, demographic profiling, marketing and other business purposes. We may share anonymised aggregated data with organisations, health professionals and researchers. However, if we combine or connect aggregated/ anonymised data with your personal information so that it can directly or indirectly identify you, we treat the combined data as personal information which will be used in accordance with this policy.

In practice, how does it work?

- UJJI LTD's service is offered through partnerships with organisations (our "Corporate Clients") who wish to make the UJJI platform available to their employees.
- Corporate Clients are interested in the outcomes derived from UJJI LTD's services, in particular how their employees are interacting with the platform and whether interactions are resulting in positive improvements to their workplace and behaviour change.
- To assist them with this, Corporate Clients are given access to aggregated/ anonymised general usage and trend data (e.g. data summaries or summary reports) so that they can perform their assessment on how our platform have been impacting users' well-being..

In order to mitigate privacy risks, we have an anonymity threshold of six people or more. This means that we will endeavour to ensure that we do not anonymise or aggregate any personal data where there are less than six people within the dataset to prevent the risk of it becoming identifiable again. We will not intentionally share aggregated data unless there were seven or more data subjects in the dataset.

## **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### **3. How is your personal data collected?**

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity and Contact Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for our products or services;
  - create an account on our Website or App;
  - request marketing to be sent to you;
  - interacts with the UJJI platform;
  - enter a competition, promotion or survey; or
  - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our Website or App, we will automatically collect Behavioural and Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies.

### **4. How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use (this is, process) your personal data in the following circumstances:

- **Necessary for entering into or performing a contract.** In order to perform obligations which arise under any contract we are about to enter into or have entered into with you (or your employer).
- **Necessary for the purposes of legitimate interests.** Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
  - Our legitimate interests include responding to requests and enquiries from you or a third party, optimising our website and user experience, informing you about our services and ensuring that our operations are conducted in an appropriate and efficient manner.
- **Necessary for compliance with a legal obligation.** We are subject to certain legal requirements which may require us to process your information. We may also be obliged by law to disclose your information to a regulatory body or law enforcement agency.

- **Consent.** In some circumstances, we may ask for your consent to process your information in a particular way (For example, we will get your consent before sending you direct marketing communications via email or text message, or where you input special category of data as part of your User-Generated Content. You have the right to withdraw consent to marketing at any time by contacting us).

### **Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you (or your employer)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Behavioural (d) Marketing and Communications	(a) Performance of a contract with you (or your employer) (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and the Website/ App (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or	(a) Identity (b) Contact (c) Behavioural	Necessary for our legitimate interests (to study how customers use our products/services, to develop them,

understand the effectiveness of the advertising we serve to you	(d) Usage (e) Marketing and Communications (f) Technical	to grow our business and to inform our marketing strategy)
To use data analytics to improve our Website/ App, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Behavioural (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)
To provide you with the services	(a) Identity (b) Contact (c) Behavioural Data	Performance of a contract with you (or your employer) (to provide you with the experience offered on our platform - e.g. setting your sessions, providing with results of your tests)
To have access to User's Calendar	(a) Identity Data (b) User-Generated Data (c) Access to calendar	UJJI triggers the calendar to help users add their gamified coaching sessions to their diaries, so they can better organise themselves on a daily basis
To have access to User's Camera Roll	(a) Identity Data (b) User-Generated Data (c) Access to camera and/or camera roll	UJJI accesses the camera roll to help users complete their gamified coaching sessions with pictures that are organised to build a journal on their progress.

## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms.

## **Promotional offers from us**

We may use your Identity, Contact, Behavioural, Technical and Usage Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

We may send you marketing communications from time to time about our new products and offers, provided that we obtain your consent to do so. If you no longer wish to receive marketing messages from us, you have the right to opt-out at any time by following the instructions in the "Opting-out" section below.

If you have already purchased goods or services from us, we may send you electronic marketing communications about products we feel may interest you (based on your prior experience with us) if you have not opted out from that marketing messages.

## **Third-party marketing**

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

## **Opting out**

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of product/service experience or other transactions.

## **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

## **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. Disclosures of your personal data**

We may share your personal data with the parties set out below for the purposes set out in the table *"Purposes for which we will use your personal data"* above.

- External Third Parties:
  - Service providers based in Poland (e.g. MDEVELOPERS SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ) who provide IT and system administration services.
  - Professional advisers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
  - HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6. International transfers**

As many of our external third parties are based outside the UK, their processing of your personal data will involve a transfer of data outside the UK.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

## **7. Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties



who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

## **8. Data retention**

### **How long will you use my personal data for?**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: see "*your legal rights*" below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## **9. Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your

request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
  - If you want us to establish the data's accuracy.
  - Where our use of the data is unlawful but you do not want us to erase it.
  - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
  - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### **10. Contact details**

If you have any questions about this privacy policy or our privacy practices, please contact our COO at [rguper@ujji.co.uk](mailto:rguper@ujji.co.uk).

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.