

Spectrum Wellness Privacy Statement

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

Who is collecting my data?

Spectrum Wellness Limited (“Spectrum Wellness”), provides this service (the “Service”) on behalf of Laya Healthcare Limited (“Laya Healthcare”).

As part of its provision of the Service, Spectrum Wellness operates the service provided websites and mobile applications (together the “Website and Apps”).

For the purposes of the General Data Protection Regulation (GDPR) and current domestic Data Protection legislation including the Data Protection Acts, Spectrum Wellness and Laya Healthcare (together “we” “us” and “our”) are registered with the Data Protection Commissioner (DPC Registration Number 13807/A) as data controllers [JF1]. Data protection and privacy is a key priority for Spectrum Wellness and Laya Healthcare. Rest assured that all individual information collected by us is recorded and managed in the strictest confidence.

What information is collected?

Spectrum Wellness may collect and process the following data about you:

- Information that you give Spectrum Wellness:
 - Information that you provide by filling in forms on the Website and Apps.
 - Information you provide to professional coaches/experts providing the Service in face to face consultations or events.
 - If you contact Spectrum Wellness by phone, e-mail, instant messaging applications or otherwise, Spectrum Wellness may keep a record of that correspondence.
 - Spectrum Wellness may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.

- Details of transactions and usage activity you carry out through the Website and Apps, including registering for particular health and/or wellness programmes available via the Service or entering a competition, promotion or survey.
- Information entered by you to the App, or collected by the App, either directly or from devices you link or synchronise with the App
- Information Spectrum Wellness collects about you: with regard to each of your visits to the Website and Apps Spectrum Wellness automatically collects the following information:
 - technical information including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.
 - information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number traffic data, location data, weblogs and other communication data.
- Information Spectrum Wellness receives from laya healthcare:

In order to allow you to sign in and register for the Service, when you click through to the Website and Apps from the members area of laya healthcare's website www.layahealthcare.ie or mobile applications, laya healthcare shares the following information with Spectrum:

- Name

- Contact details
- Unique identified (not your membership number)
- County
- Age (not Date of Birth)
- Gender
- Membership status
- Cover level relevant to this benefit
- Group and Site ID, if you are a member via a corporate customer

What is my data being used for?

The information you have provided will be used by Spectrum Wellness to;

- identify you, and verify your details for the purpose of using the Service
- send updates regarding your appointments, registrations and programmes
- provide you with tailored programmes, events and services
- provide you with advice dependant on the information you have given
- contact you in the event of a data breach
- aggregate your information to identify usage patterns and trends
- improve our suite of products based on your aggregated information

Sale of Business:

Spectrum Wellness reserve the right to transfer information (including your Personal Data) to a third party in the event of a sale, merger, liquidation, receivership or transfer of all or substantially all of the assets of our company provided that the third party agrees to adhere to the terms of the Website Privacy Policy and provided that the third party only uses your Personal Data for the purposes that you provided it to Spectrum Wellness. You will be notified in the event of any such transfer and you will be afforded an opportunity to opt-out.

Updating, Verifying and Deleting Personal Data:

You may inform Spectrum Wellness of any changes in your Personal Data, and in accordance with our obligations under the Data Protection Acts 1988 and 2002 we will update or delete your Personal Data accordingly.

What data is shared with laya healthcare

Spectrum Wellness may collect, process and share the following data with laya healthcare:

- Information that you provide by filling in forms on the Website and Apps.
 - Information you provide to professional coaches/experts providing the Service in face to face consultations or events.
 - If you contact Spectrum Wellness by phone, e-mail, instant messaging applications or otherwise, Spectrum Wellness may keep a record of that correspondence.
 - Spectrum Wellness may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
 - Details of transactions and usage activity you carry out through the Website and Apps, including registering for particular health and/or wellness programmes available via the Service or entering a competition, promotion or survey.
 - Information entered by you to the App, or collected by the App, either directly or from devices you link or synchronise with the App
- Information Spectrum Wellness collects about you: with regard to each of your visits to the Website and Apps, Spectrum Wellness automatically collects the following information:
 - technical information including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.
 - information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone

number used to call our customer service number traffic data, location data, weblogs and other communication data.

How will laya healthcare use my data

Spectrum Wellness will share your data with laya healthcare to allow laya healthcare to improve the overall health and wellbeing of its members, including, but not limited to

- facilitate the monitoring, management and ongoing service improvement of the Service by laya (for example, details of any issued reported regarding the Service or complaints made may be shares with laya healthcare)
- facilitate the design and development of future products to improve the health and wellbeing of laya members
- identify and communicate with laya members who may benefit from current or new laya products and services.

All mental health related data (including and not limited to MindScore & 27/7 Mental Wellbeing Support, or EAP) will be anonymised and unidentifiable.

Community Rating

laya healthcare is required by law to charge all consumers, with certain limited exceptions, the same net premium for a given level of cover regardless of age, sex and other risk factors. laya healthcare can not by law, and will not, ever use the data collected about your use of the Service to adjust the premium charged for your personal medical insurance policy.

Is my data shared with my employer

We will not share any of your sensitive data with your employer. Your employer may receive a company overview report containing only anonymised and aggregated data about the health and wellness of their employees as a whole.

Your employer may receive reports containing identifiable information that indicates that you have registered to use the service.

We will never share sensitive information in an identifiable format with your employer including;

- Screening data collected by the Service
- Metric data collected by the Service
- Activity data tracked by the Service

Is my data shared with other parties

Spectrum Wellness and laya healthcare will not share your personal information with any other third party without your consent save:

- in the event that Spectrum Wellness or laya healthcare or substantially all of their assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of Spectrum Wellness, laya healthcare, our customers, or others.
- Your data may be shared with other Spectrum 10x subsidiary companies; including Spectrum Health, Spectrum Ergonomics, Spectrum Mental Health and Spectrum 10x itself.
- Your data may be shared with 3rd party customer support tools including; Zendesk and Intercom however Spectrum Wellness staff are the only administrators on these tools
- For on-site events, your name and the service you are accessing may be shared with your employer in order to facilitate that event onsite. An exception to this is mental health services and EAP.

Is my data secure?

Submissions from the Service are sent in an encrypted format to a secure and encrypted password protected database. Spectrum Wellness and laya healthcare have industry standard, best practice measures in place to ensure that your information is transmitted and held securely, within the EU and access is restricted to relevant team members who are bound by confidentiality agreements. Your data will be held by Spectrum Wellness as long as is legally required and for the duration of the contract with laya healthcare. Laya healthcare will hold your data for as long as is legally required and according to laya's full privacy statement (click here for full details <https://www.layahealthcare.ie/privacypolicy/>) The transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data following industry best practice, we cannot completely guarantee the security of your data transmitted to the Website and Apps; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

What are my rights regarding my data

You have a right to request personal data about yourself in writing and to correct the same if it is incomplete or misleading. Any subject access request will be responded to within 30 days.

You can withdraw your consent regarding your data at any time in writing; or should you wish to review our shared Data Protection Policy; or should you have any questions about your data - please contact us on hello@spectrumwellness.ie

Links to other websites

The Website and Apps may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Cookies

The Website and Apps use cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse the Website and Apps also allows Spectrum Wellness to improve the Website and Apps. For detailed information on the cookies we use and the purposes for which we use them see our [Cookie policy](#).

Changes to this Privacy Policy

Any changes we make to this privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes to this privacy policy.

Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to hello@spectrumwellness.ie

V1.1.0

Last updated: 23/05/2018