



## Privacy Policy

1. Wellyx and its affiliated companies welcome your interest in this website. We take your privacy seriously and want you to understand our practices with respect to the handling of your personal data. This privacy statement explains how we do this.
2. This Privacy Policy describes our practices in connection with information that we collect through:
  - 2.1. our consumer facing mobile application (“Wellyx App”)
  - 2.2. our online business management software (“Software Service”)
  - 2.3. our social media pages
  - 2.4. HTML-formatted email messages that we send to you that link to this Privacy Policy
  - 2.5. and any other Wellyx products and services offered through any other venues, websites and mobile applications that direct you to this Privacy Policy

Collectively the “Wellyx Services or Service”

3. “You” or “Your” means a user of the Service, which could refer to an individual, an employer, an employee associated with an employer account, or any other authorized user of the Wellyx Services.

## Information We Collect and Use

4. We collect personal information from our users in a variety of ways, including:
  - 4.1. **Information you provide:** We may collect and store personal information you register for Wellyx Services or provide to us in some other manner. For example, when you register with the Wellyx Services, we collect your name, email address, password, contact information and employment information. If you are an employer, we also collect information about your business, payment information and any information you provide about your employees, including your employees’ contact information and pay-scale. We may also collect any communications between you and Wellyx, any information you provide if you take part in any interactive features of the Wellyx Services, and any other information you provide to us.
  - 4.2. **Data collected through the use of Wellyx Services:** After you set up your account, we collect information about how you use the Wellyx Services and about your actions on the Wellyx Services, including your work schedule, your availability, your time records, your messages to others on the Wellyx Services and comments you make on the Wellyx Services forums or blogposts.
  - 4.3. **Information we receive from social networking sites:** When you interact with our site through various social media, such as when you login through Facebook or Google, or share

When I Work content on Facebook, Twitter, or other sites, we may receive information from the social network including your profile information, profile picture, gender, user name, user ID associated with your social media account, age range, language, country, friends list, and any other information you permit the social network to share with third parties. The data we receive is dependent upon your privacy settings with the social network, and we will not post information about you on third party social media sites without your consent. You should always review, and if necessary, adjust your privacy settings on third-party websites and services before linking or connecting them to our website or Service.

- 4.4. **Address book, calendar and contact information:** With your permission, Wellyx Services may access your contact list available on your mobile device, in your email accounts or other information system you connect with the Wellyx Service in order to locate your friends, contacts and employees on the Wellyx Services and to invite them to register with our Wellyx Services. With your permission, we may integrate our Service with your calendar system (such as Google Calendar, Outlook, etc.) in order to provide updates of your schedule on the Service to your calendar, and to integrate your calendar entries with your Wellyx schedule.
- 4.5. **Information we receive from third parties:** From time to time, we may receive information about you from third parties, such as identity verification, payroll vendors and other information. We may also collect information about you that is publicly available.
5. We use this information to operate, maintain, and provide to you the features and functionality of the Wellyx Services, as well as to communicate directly with you, permit you to communicate with others on the Service or on social media, or invite others to join the Service. We may compile analytics and share performance data on a de-identified or aggregate basis. We may send you email communications that contain information about our products or Service, or information about third parties' products or services we think you may enjoy. We may also send you Service-related emails or messages (e.g., account verification, messages and schedules, change or updates to features of the Service, technical and security notices).

## How we use cookies and other tracking technology to collect information.

6. We, and our third-party partners, automatically collect certain types of usage information when you visit our Services, read our emails, or otherwise engage with us. We typically collect this information through a variety of tracking technologies, including cookies, Flash objects, web beacons, file information and similar technology (collectively, "tracking technologies"). For example, we collect information about your device and its software, such as your IP address, browser type, Internet service provider, platform type, device type, operating system, date and time stamp, a unique ID that allows us to uniquely identify your browser, mobile device or your account, and other such information. We also collect information about the way you use our Service, for example, the site from which you came and the site to which you are going when you leave our website, the pages you visit, the links you click, how frequently you access the Service, whether you open emails or click the links contained in emails, whether you access the Service from multiple devices, and other actions you take on the Service. When you access our Service from a mobile device, we may collect unique identification numbers associated with your device

or our mobile application (including, for example, a UDID, Unique ID for Advertisers (“IDFA”), Google AdID, or Windows Advertising ID), mobile carrier, device type, model and manufacturer, mobile device operating system brand and model, phone number, and depending on your mobile device settings, your geographical location data, including GPS coordinates (e.g., latitude and/or longitude) or similar information regarding the location of your mobile device, or we may be able to approximate a device’s location by analyzing other information, like an IP address. We may collect analytics data, or use third-party analytics tools, to help us measure traffic and usage trends for the Service and to understand more about the demographics of our users. We may also work with third party partners to employ technologies, including the application of statistical modeling tools, which attempt to recognize you across multiple devices. Although we do our best to honor the privacy preferences of our users, we are unable to respond to Do Not Track signals set by your browser at this time.

7. We use or may use the data collected through tracking technologies to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the site; (b) provide custom, personalized content and information, including targeted content and advertising; (c) identify you across multiple devices; (d) provide and monitor the effectiveness of our Service; (e) monitor aggregate metrics such as total number of visitors, traffic, usage, and demographic patterns on our website; (f) diagnose or fix technology problems; and (g) otherwise to plan for and enhance our service.
8. If you would prefer not to accept cookies, most browsers will allow you to: (i) change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) disable existing cookies; or (iii) set your browser to automatically reject cookies. Please note that doing so may negatively impact your experience using the Service, as some features and services on our Service may not work properly. Depending on your mobile device and operating system, you may not be able to delete or block all cookies. You may also set your e-mail options to prevent the automatic downloading of images that may contain technologies that would allow us to know whether you have accessed our e-mail and performed certain functions with it.
9. We and our third party partners may also use cookies and tracking technologies for advertising purposes.

## Sharing Information

10. We may share your personal information in the instances described below.
  - 10.1. **Other members of the Service:** Your information will be shared other users of the Service, as needed to provide the Services to you. For example, some of your information may be shared with your employer and with other employees of the same employer in order to facilitate scheduling, timekeeping and communication. You may be able to control the visibility of some of your information and actions through your Settings. We also share information about your use of the Service with your employer for analytic purposes. For example, we provide reporting tools to allow an employer to evaluate the efficiency of its workforce, and its employees’ responsiveness and availability;

- 10.2. With third parties with your consent. From time to time, we may provide an opportunity to share your information with one of our third party partners or other individuals. We will ask for your consent before engaging in this type of sharing;
  - 10.3. Other companies owned by or under common ownership as Wellyx, which also includes our subsidiaries (i.e., any organization we own or control) or our ultimate holding company (i.e., any organization that owns or controls us) and any subsidiaries it owns. These companies will use your personal information in the same way as we can under this Policy;
  - 10.4. Third party vendors, consultants and other service providers that perform services on our behalf, in order to carry out their work for us, which may include identifying and serving targeted advertisements, hosting services, or providing analytics services;
  - 10.5. Other parties in connection with any company transaction, such as a merger, sale of all or a portion of company assets or shares, reorganization, financing, change of control or acquisition of all or a portion of our business by another company or third party or in the event of bankruptcy or related or similar proceedings; and
  - 10.6. Third parties as required to (i) satisfy any applicable law, regulation, subpoena/court order, legal process or other government request, (ii) enforce our Terms of Use Agreement, including the investigation of potential violations thereof, (iii) investigate and defend ourselves against any third party claims or allegations, (iv) protect against harm to the rights, property or safety of When I Work, its users or the public as required or permitted by law and (v) detect, prevent or otherwise address criminal (including fraud or stalking), security or technical issues.
11. We may also share information with others in an aggregated and anonymous form that does not reasonably identify you directly as an individual.

## Your Choices Regarding Your Information

12. **Profile and Data Sharing Settings:** You may change some of your data sharing preferences on your Settings page. For example, you may mark certain aspects of your profile as private so that it may not be viewable by other users of the Service. If you use the Service as an employee, certain elements of your information will be automatically shared with your employer, depending on how your employer has configured the company account and user permissions on the Service.
13. **Access to your Device Information:** You may control the app's access to your device information through your "Settings" feature on your device. For instance, you can withdraw permission for the app to access your address book and location data.
14. **Communications:** From time to time, the Service will send communications about news and updates, advice and analytics relating to your use of the Service. The Service also facilitates communication between users by email, text message and in-app notifications. Users can adjust communications preferences through Settings.

- 14.1. When an employer invites an employee to register with the Service, we will send that employee a message using the contact information provided by the employer. The employer must certify that it has the employee's consent for Wellyx to contact the employee on the employer's behalf using that method of communication.
  - 14.2. If you want to invite your friends, contacts or employees to try out the Service, we will send the contact an email, which may include your name and photo to let them know that you are the person extending the invitation. After sending these invitations, we may also send reminder emails to your invitees on your behalf. We will store these contacts for ease of connecting with them on the Service at a later time. We may also provide you the option to send invitations via SMS text message. You may not use the Service to send text messages unless you have the consent from the recipient to receive text message communications.
15. **Marketing Communications:** From time to time, we may send promotional messages. If you do not wish to receive promotional emails, you can change your email preferences on your Settings page on our websites, or you can click the "unsubscribe" button on promotional email communications. Note that you are not permitted to unsubscribe or opt-out of non-promotional messages regarding your account, such as account verification, change or updates to features of the Service, or technical and security notices.
16. **Data Retention:** We will retain your information for as long as your account is active or as needed to for our internal purposes. When you deactivate your account, including if you are removed from an employer's company account, we will remove your information from view by others on the Service but we may retain your account information internally so that you can access your account history through an individual account and so that you may re-register an account with another employer more quickly in the future. You may request to delete your account information by contacting us at support@wellyx.com. However, please be aware that we will not be able to delete any content you have shared with others on the Service. For example, your employer will have a record of your schedule when you were employed, and will retain the data the employer provided to us about you.
17. **Deleting or Anonymizing Your Content.**
  - 17.1. If you are under 18 years of age, you may request to delete or anonymize user content that you posted to the Service such that your personal information will not be identifiable publicly on our Service by contacting us at support@wellyx.com. While we will use all commercially reasonable efforts to delete or anonymize your user content upon request, please be aware that due to the nature of our Service, you may not be able to completely remove all of your personally identifiable user content if, for example, that content has been stored, republished, or reposted by another user or a third party. We may also maintain your information in identifiable form for our internal use, even if your personal data is no longer visible to the public on our Service.

## Security and Storage of Information

18. Wellyx cares about the security of your information and employs physical, administrative, and technological safeguards designed to to preserve the integrity and security of all information we collect and that we share with our service providers. However, no security system is impenetrable, and we cannot guarantee the security of our systems 100%.
19. In the event that any information under our control is compromised as a result of a breach of security, we will take reasonable steps to investigate the situation and where appropriate, notify those individuals whose information may have been compromised and take other steps, in accordance with any applicable laws and regulations. If you are an employee whose information is associated with a Company account on our Service, we will notify the employer or company user of a breach of security which requires legal notification, and your employer shall be responsible for informing you of the incident.
20. Your information collected through the Service may be stored and processed in the United States or any other country in which Wellyx or its subsidiaries, affiliates or service providers maintain facilities. If you are located in the European Union or other regions with laws governing data collection and use that may differ from U.S. law, please note that we may transfer information, including personal information, to a country and jurisdiction that does not have the same data protection laws as your jurisdiction, and you consent to the transfer of information to the U.S. or any other country in which Company or its parent, subsidiaries, affiliates or service providers maintain facilities and the use and disclosure of information about you as described in this Privacy Policy.

## Contacting Us

21. If you have questions about this Policy, please contact us at [support@wellyx.com](mailto:support@wellyx.com) or by writing to us at:
  - 21.1. Wellyx  
221 New Kent Road  
London  
SE1 4AG.
22. **Third Party Sub-Processors:** The following is a list of current third party vendors that may either directly or indirectly collect information from you in their capacity as a Sub-Processor. Please review the relevant privacy policies (links current as of the date of publication of this Privacy Policy) for further information on how each third party handles your Personal Information:

Third Party Name	Privacy Policy/Notice Link
Mailgun	<a href="https://www.mailgun.com/privacy-policy">https://www.mailgun.com/privacy-policy</a>
Stripe	<a href="https://stripe.com/us/privacy">https://stripe.com/us/privacy</a>
Twilio	<a href="https://www.twilio.com/legal/privacy">https://www.twilio.com/legal/privacy</a>
GoCardless	<a href="https://gocardless.com/privacy/">https://gocardless.com/privacy/</a>