

Engaging Privacy Policy

Date: 24/11/2020

Introduction

This privacy policy (**Policy**) relates to your personal information in connection with your use of and access to any of the Engaging websites <https://workl.co> (**WorkL Platform**) and <https://www.engaging.business> (**Engaging Business Platform**) (the WorkL Platform and Engaging Business Platform together forming the Engaging Platforms) and any services provided by Engaging (the **Engaging Platforms** and services together forming the **Engaging Services**).

We are committed to protecting your information and your right to privacy. If you have any questions or concerns about our policy or our practices with regards to your personal information, please contact us at support@engaging.business.

When you use the Engaging Services, you trust us with your Information. We take your privacy very seriously. We seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this Policy that you do not agree with, please discontinue use of the Engaging Services.

Changes to this Policy or your personal information

We review this Policy regularly and it is your responsibility to check regularly and determine whether this Policy has changed. If you do not agree to any changes to this Policy then you must immediately stop using the Engaging Services. In the event we make any significant changes to this Policy, we will use our best endeavours to inform you or such changes in advance in writing.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes, for example, you change your email address

About Us

The Engaging Services are owned and operated by Engaging Works Group Limited (trading as Engaging Business and WorkL) a company registered in England and Wales (company number 07946689) and our registered office is at Mole End, Shorts Green Lane, Motcombe, Dorset, SP7 9PA. Our VAT number is 225707317) **(Engaging/we/us/our)**.

In relation to the processing of your information to undertake the survey, the Scottish Parliament is the controller (also known as a data controller) and Engaging is the processor. For all other activities, including the creation of an account on the Engaging Platforms, Engaging is the controller (also known as a data controller) and is responsible for your personal information. The term "you" refers to the user wishing to access and/or use the Engaging Services.

The survey the Scottish Parliament has asked you to complete does not require you to create a personal account. Your question and demographic answers cannot be linked back to your without an account. Neither the Scottish Parliament nor Engaging can trace these responses back to the individual. You will have access to your personal dashboard and Six Steps Happiness Score at the end of the completion of your survey.

If you are accessing the survey via your organisation, you have the option to create an account to save your survey responses. This is entirely optional and individual dashboard results will be shown without the creation of an Engaging account. Any individual results you create, such as a happiness score, will not be shared with anyone (including your organisation) without your Consent.

Account Information

You may at any time review or change the information in your account by logging into your Engaging account.

If you wish to terminate your Engaging account you must email us at support@engaging.business. Some information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our terms and/or comply with legal requirements.

Information we may collect about you

Personal information you disclose to us

In Short: We collect personal information that you provide to us, including information such as name, address, contact information and payment card information.

We collect personal information that you voluntarily provide to us when registering and using the Engaging Services, or otherwise contacting us. The personal information that we collect depends on the context of your interactions, the choices you make and the products and features you use. When you use the Engaging Services and/or when you otherwise deal with us, we may collect the following information about you (the **Information**):

- Identity Data includes first name, last name, job title, job location, date of birth or age range, ethnicity and gender.
- Contact Data means the data we use to contact you including your billing address, delivery address, email address and contact number.
- If you purchase any Engaging Services, financial data which means the payment method and card association used to process your payments for your orders. We do not store or process your card details ourselves, they are processed and stored via one of our contracted third-party service providers. We encrypt your payment card details in your browser and securely transfer this data to our relevant third party payment provider to process a payment.
- Transaction Data means details about transactions you have made using the Engaging Services including the payments to and from you along with other details of products you have purchased from us.
- Profile Data includes your username (email address), your profile picture, your login data, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you use the Engaging Services. This includes your browsing patterns and information such as how long you might

spend on one of our webpages on the Engaging Platforms and what you look at and for, the page that referred you to the Engaging Platforms and the clickstream during your visit to our website, page response times and page interaction information (clicks you make on a page).

- Marketing and Communications Data includes your preferences in receiving marketing from us and your communication preferences.
- Other information relevant to services, customer surveys and/or offers.

All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to your Information.

Information automatically collected

In Short: Some information – such as IP address and/or browser and device characteristics – is collected automatically when you use the Engaging Platforms.

We automatically collect certain information when you visit, use or navigate the Engaging Platforms. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use the Engaging Platforms and other technical information. This information is primarily needed to maintain the security and operation of the Engaging Platforms, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies. You can find out more about this in our **Cookies Policy** (<https://workl.co/legal/cookies>).

How do we use your Information?

In Short: We process your Information for purposes based on legitimate business interests, the fulfilment of our contract with you, compliance with our legal obligations, and/or your consent.

We use your Information collected via the Engaging Services for a variety of business purposes described below. We process your Information for these purposes in reliance on our legitimate business interests (**Business Purposes**), in order to enter into or perform a contract with you (**Contractual**), with your consent (**Consent**), and/or for compliance with our legal obligations (**Legal Obligations**). We indicate the specific processing grounds we rely on next to each purpose listed below.

We may process your Information for the following purposes:

- Fulfil and manage any services you use in connection with the Engaging Services (Contractual). We may use your Information to fulfil and manage your services, payments and any interaction in connection with any Engaging Services.
- To send administrative information to you for Business Purposes, Legal Reasons and/or possibly Contractual. We may use your Information to send you product, service and new feature information and/or information about changes to our terms and policies.
- To send you marketing and promotional communications for Business Purposes and/or with your Consent. We and/or our brand partners may use your Information for our marketing purposes if this is in accordance with your marketing preferences. You can opt-out of our marketing emails, see below for further details.
- To post testimonials with your Consent. We may post testimonials on the Engaging Platforms that may contain your Information, for example, your name. Prior to posting a testimonial, we will obtain your written consent to use your name and testimonial. If you wish to update, or delete your testimonial, please contact us at support@engaging.business and be sure to include your name, testimonial location, and contact information.
- Administer promotions for our Business Purposes and/or with your Consent.
- Request Feedback for our Business Purposes and/or with your Consent. We may use your Information to request feedback and to contact you about your use of the Engaging Platforms.
- To protect the Engaging Services for Business Purposes and/or Legal Reasons. We may use your Information as part of our efforts to keep our the Engaging Services safe and secure (for example, for fraud monitoring and prevention).

- To enforce our terms and policies for Business Purposes, Legal Reasons and/or possibly Contractual.
- To respond to legal requests and prevent harm for Legal Reasons. If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
- For other Business Purposes. We may use your Information for other Business Purposes, for example, using anonymised data analysis for your organisation's results dashboard and to evaluate and improve the Engaging Services such as the survey functions or results' dashboard services for your and the organisation's optimal experience.
- In relation to other Business Purposes: the data provided in the survey answers are used to create your individual dashboard including your Happiness Score. This Happiness Score is calculated on the answers given on the core Six Steps questions (20 first questions of your survey). Each category includes 3-4 questions of which the average is taken to create a Happiness Score per step.

Will your Information be shared with anyone?

In Short: We only share information to comply with Contractual obligations, fulfil our Business Purposes, or with your Consent.

We only share and disclose your Information in the following situations:

- Compliance with Legal Obligations. We may disclose your Information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal processes, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- Vital Interests. We may disclose your Information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

- **Third-Party Service Providers.** We may share your Information with third-party vendors, service providers, contractors or agents who perform services and require access to such information to do that work. Examples include data analysis, email delivery, hosting services and customer service. They will only have access to your Information to the extent that they need to perform those services. They are required to keep your Information confidential and may not use it other than as we ask them to and always in accordance with this Policy.
- **Business Transfers.** We may share or transfer your Information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Business Partners.** Provided you have given us Consent to do so we may share your Information with our business partners to offer you certain products, services or promotions.
- **With your Consent.** We may disclose your Information for any other purpose with your Consent.

We may disclose aggregated, anonymous information (i.e. information from which you cannot be personally identified), or insights based on such anonymous information, to selected third parties, including (without limitation) analytics and search engine providers to assist us in the improvement and optimisation of the Engaging Services. In such circumstances, we do not disclose any information which can identify you personally.

Is your Information transferred internationally?

In Short: We do not transfer, store, and process your Information in countries other than the UK and take all reasonable steps to ensure it is protected should it be transferred.

If we were to transfer your Information outside of the UK, we would take all reasonable measures that we can to protect your Information in accordance with this Policy and applicable law. Should this happen, you would receive prior notification. To the extent that any transfer requires approved safeguards are in place, we will ensure these measures are in place (for example if transferring outside of the European Economic Area that the EU model contract clauses are used) and we shall adopt any

supplementary measures that are necessary to bring the level of protection of the Information transferred up to a standard of essential equivalence.

How long do we keep your Information?

In Short: We keep your Information for as long as necessary to fulfil the purposes outlined in this Policy unless otherwise required by law.

We will only keep your Information for as long as it is necessary for the purposes set out in this Policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements).

When we have no ongoing Business Purpose to process your Information, we will either delete or anonymize it, or, if this is not possible (for example, because your Information has been stored in backup archives), then we will securely store your Information and isolate it from any further processing until deletion is possible.

If you have created an account, unless required by law, your Information may be deleted upon receipt of a valid request for deletion. And please be aware that in the event that your account is inactive for a period of 18 months or more your Information may be deleted.

How do we keep your Information safe?

In Short: We aim to protect your Information through a system of organisational and technical security measures.

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your Information, the transmission of personal information to and from the Engaging Platforms is at your own risk. You should only access our services within a secure environment.

Data-in-transit

All data transfers between the user's location and the data center are secure and encrypted using the SSL standard with the following specification (minimum):

- Signature Algorithm: SHA-256
- Public Key Algorithm: RSA encryption
- Key size: 2048 bits
- Issuers we work with: Let's Encrypt, COMODO, GoDaddy, Gandi

Do we collect information from minors?

In Short: We take steps to ensure that the Engaging Services are only used by those over 16 years of age and we do not knowingly collect data from or market to children under 16 years of age.

We do not knowingly solicit data from or market to children under 16 years of age. By using the Engaging Services, you represent that you are at least 16 years of age. If we learn that personal information from users less than 16 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we have collected from children under age 16, please contact us at support@engaging.business.

Your Consent to processing

You will be required to give Consent to certain processing activities before we can process your Information. Where applicable, we will seek Consent from you when you first submit Information to or through the Engaging Services.

If you have previously given your Consent you may freely withdraw such Consent at any time. You can do this by emailing support@engaging.business.

If you withdraw your Consent, and if we do not have another legal basis for processing your Information, then we will stop processing your Information. If we do have another

legal basis for processing your Information, then we may continue to do so subject to your legal rights.

Please note that if we need to process your Information in order for you to use the Engaging Services and you object or do not provide Consent to us processing your Information, the Engaging Services may not be available to you.

Marketing and opting out

If you have given Consent to marketing we may contact you about our products, services, promotions and special offers. If you no longer wish to receive such information you can withdraw your Consent at any time by sending an email to support@engaging.business or unsubscribing from the communications.

What are your privacy rights?

In Short: You have certain rights in respect of your Information.

You have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your Information, (ii) to request rectification or erasure of your Information; (iii) to restrict the processing of your Information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your Information. To make any requests, please contact us at support@engaging.business. We will consider and act upon any request in accordance with applicable data protection laws.

We may need to request specific information from you to help confirm your identity and ensure your right to access your Information (or to exercise any of your other rights). This is a security measure to ensure that your Information is not disclosed to a person who does not have the right to receive it. We may also contact you to ask you for further information in relation to your request to speed up your response.

If we are relying on Consent to process your Information, you have the right to withdraw your Consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal.

Contact us

We welcome your feedback and questions on this Policy. If you wish to contact us about this Policy, about our Information or any other questions, please email us at support@engaging.business.

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