

**WORK WALLET LIMITED**  
**WEBSITE AND MOBILE APPLICATION PRIVACY POLICY**

**INTRODUCTION**

Welcome to Work Wallet Limited's privacy notice.

Work Wallet Limited respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) or use our mobile application (regardless of what type of device you use it from) and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Alternatively you can download a pdf version of the policy here <https://www.work-wallet.com/privacy-policy/>. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

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**IMPORTANT INFORMATION AND WHO WE ARE**

**Purpose of this privacy notice**

This privacy notice aims to give you information on how Work Wallet Limited collects and processes your personal data through your use of our website and mobile application, including any data you submit when you sign up as a user of our mobile application.

Our website and mobile application are not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice 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 notice supplements the other notices and is not intended to override them.

## **Controller**

Work Wallet Limited is the controller and responsible for your personal data (collectively referred to as **Work Wallet, we, us** or **our** in this privacy notice).

We have appointed a Product Director (**PD**) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights please contact the PD using the details set out below.

## **Contact details**

Our full details are:

Full name of legal entity: Work Wallet Limited. We are registered in England and Wales under number 10315489 and we have our registered office at Friar Gate Studios, Ford Street, Derby, England, DE1 1EE. Our VAT number is GB 248590867.

Product Director: Adam Civval

Email address: [pd@work-wallet.com](mailto:pd@work-wallet.com)

Postal address: Friar Gate Studios, Ford Street, Derby, England, DE1 1EE

Telephone number: 01332 742594

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority 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.

Data protection law requires Work Wallet Limited, as controller for your data:

- to process your data in a lawful, fair and transparent way;
- to only collect your data for explicit and legitimate purposes;
- to only collect data that is relevant, and limited to the purpose(s) we have told you about;
- to ensure that your data is accurate and up to date;
- to ensure that your data is only kept as long as necessary for the purpose(s) we have told you about;
- to ensure that appropriate security measures are used to protect your data.

### **Changes to the privacy notice and your duty to inform us of changes**

This version was last updated in March 2019 and historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. We may ask you to confirm updates to your personal data from time to time but please keep us informed if your personal data changes during your relationship with us in the meantime. Please inform the PD of any changes in your data at the following email address: [pd@work-wallet.com](mailto:pd@work-wallet.com)

### **Third-party links**

Our website 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 and organisations connected with us have a social media presence for the purpose of engaging with you.

If you enable such connections or choose to communicate your personal data to us via third-party websites or social media, please remember that we do not control these third-party websites and are not responsible for their privacy statements. When you leave our website or interact with us on social media, we encourage you to read the privacy notice of every website or forum that you visit or use.

### **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 follows:

- **Identity Data** includes first name, last name, username or similar identifier, date of birth and photo identification.
- **Contact Data** includes email address, postal address and telephone numbers (including emergency contact numbers and next of kin information).
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments from you and other details of services you have purchased from us, including which tier of our mobile application you are subscribed to.
- **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 our website and our mobile application.
- **Profile Data** includes your username and password, your preferences and feedback.
- **Professional Data** includes data relating to your qualifications, training and completion of any site inductions, results of any tests you have taken on our mobile application, details of your location (if you enable this function within the mobile application), details of times at which you have clocked in/out of a job, and any other similar personal data you may submit via our mobile application.
- **Health Data** includes details of any injuries, health conditions and requirements or other similar information which you may submit via our mobile application.
- **Usage Data** includes information about how you use our website and mobile application.
- **Communications Data** includes your communication preferences.

We refer to the above categories of data in the data subject category tables which can be found [here](#).

We may from time to time collect **Special Categories of Personal Data** about you (this may include 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). Much of this information is provided by way of Health Data and identified as such in our information tables. All such information is collected in accordance with this privacy notice. We have in place appropriate policy documents and/or other safeguards which we are required by law to maintain when processing

such data.

### **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 services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

### **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, Contact, Professional, Health and Financial Data by filling in forms or by corresponding with us by phone, email or otherwise. This includes personal data you provide when you:
  - contact us via the contact form on our website;
  - register as a user of our mobile application;
  - upload information to our mobile application;
  - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we or our third party processors may automatically collect **Technical Data** about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties as set out below:
  - Technical Data from analytics providers such as Google based outside the EU;
  - Contact, Financial and Transaction Data from providers of technical and payment services such as Go Cardless based inside the EU.

### **HOW WE USE YOUR PERSONAL DATA**

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

- Where we need to perform the contract we are about to enter into or have entered into with you.
- 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.

- Where we need to comply with a legal or regulatory obligation.

Click [here](#) to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally we do not rely on consent as a legal basis for processing your personal data.

### **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. The table is split into three different sections for each category of data subject: individual users, business users and members of the public. You should consult the relevant section of the table to determine how we process your personal data. Note that you may fall into more than one category (for example, you may be an individual user of our mobile application but may also view our website as a member of the public).

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.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Third party processing and international transfer information
<b>INDIVIDUAL USERS - this section of the privacy policy applies to users of our mobile application.</b>			
To register you as a new user of the mobile application	(a) Identity (b) Contact (c) Profile	Performance of a contract with you	Microsoft Azure Cloud Services (based within the EU) are engaged as a third party to store data and host our application and website
To enable you to use the functions of our mobile application including: (a) Uploading and storing your information on our mobile application for businesses (with whom you are engaged to provide services to) to access; (b) Taking tests or quizzes; (c) Enabling you to clock in/out of a job you are engaged to undertake.	(a) Identity (b) Contact (c) Profile (d) Professional (e) Health (f) Technical	Performance of a contract with you	Microsoft Azure Cloud Services (based within the EU) are engaged as a third party to store data and host our application and website
To enable businesses (with whom you are engaged to provide services to) to use our mobile application including:	(a) Identity (b) Contact (c) Profile	Performance of a contract with you	Microsoft Azure Cloud Services (based within the EU) are engaged as a third party to store data

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Third party processing and international transfer information
<p>(a) To access the information you have uploaded to our mobile application;</p> <p>(b) To monitor your location for the purposes of clocking you in/out or lone worker safety;</p> <p>(c) To share your personal information with other businesses (such as sub or primary contractors) who are also registered with our mobile application and who may require your personal information;</p> <p>(d) To contact your emergency contact in the case of an emergency</p>	<p>(d) Professional</p> <p>(e) Health</p> <p>(f) Technical</p>		<p>and host our application and website</p> <p>Businesses (with whom you are engaged to provide services to or may in the future be engaged to provide services to) may share their access to your personal information between themselves as they deem appropriate and you should check their privacy policy for further information as to the terms of their data processing practices.</p>
To manage our relationship with you which will include notifying you about changes to our terms or privacy policy	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>	Microsoft Azure Cloud Services (based within the EU) are engaged as a third party to store data and host our application and website



Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Third party processing and international transfer information
To administer and protect our business and our mobile application (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	Microsoft Azure Cloud Services (based within the EU) are engaged as a third party to store data and host our application and website
To measure or understand how you use our mobile application, including the use of data analytics	(a) Identity (b) Contact (c) Profile (d) Usage (e) Technical	Necessary for our legitimate interests (to study how users use our website and mobile application, to develop them, to grow our business and to inform our marketing strategy)	Microsoft Azure Cloud Services (based within the EU) are engaged as a third party to store data and host our application and website  We use Google Analytics and other similar analytics services (who may be based inside or outside the EU) within our website and mobile application to track page views, source information, generic session information and

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Third party processing and international transfer information
			error logs
<b>BUSINESS USERS - this section of the privacy policy applies to our business customers and partners (who may be companies, individuals, sole traders and small partnerships) or their representatives who use our mobile application pursuant to a licence agreement.</b>			
<p>To process and deliver your request to engage our mobile application services including:</p> <p>(a) Manage payments, fees and charges</p> <p>(b) Collect and recover money owed to us</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Transaction</p> <p>(e) Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to recover debts due to us)</p>	<p>Microsoft Azure Cloud Services (based within the EU) are engaged as a third party to store data and host our application and website</p> <p>We may use a third party direct debit payment provider called Go Cardless for the purposes of processing your direct debit payments</p>
To enable you to use the functions of our mobile application including accessing and sharing end user information	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p>	Performance of a contract with you	Microsoft Azure Cloud Services (based within the EU) are engaged as a third party to store data and host our application

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Third party processing and international transfer information
	(d) Professional (e) Technical		and website
To manage our relationship with you which will include notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (c) Profile (d) Communications	(a) Performance of a contract with you (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)	Microsoft Azure Cloud Services (based within the EU) are engaged as a third party to store data and host our application and website
To administer and protect our business and our mobile application (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	Microsoft Azure Cloud Services (based within the EU) are engaged as a third party to store data and host our application and website
To deliver relevant content to you and measure or understand how you use our mobile application, including the use of data analytics	(a) Identity (b) Contact (c) Profile (d) Usage (e) Communications	Necessary for our legitimate interests (to study how users use our mobile application, to develop them, to grow our business and to inform our marketing strategy)	Microsoft Azure Cloud Services (based within the EU) are engaged as a third party to store data and host our application and website

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Third party processing and international transfer information
	(f) Technical		We use Google Analytics and other similar analytics services (who may be based inside or outside the EU) within our website and mobile application to track page views, source information, generic session information and error logs
<b>PUBLIC - this section of the privacy policy applies to members of the public.</b>			
To enable us to respond to your query submitted through our website contact form	(a) Identity (b) Contact	Necessary for our legitimate interests (to respond to your query and deal with it appropriately)	Microsoft Azure Cloud Services (based within the EU) are engaged as a third party to store data and host our application and website
To store your details where you have been involved in an accident involving a user of our mobile	(a) Identity	Necessary for our legitimate interests (to enable us to store data uploaded by users of our mobile application (a service which our	Microsoft Azure Cloud Services (based within

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Third party processing and international transfer information
application	(b) Contact (c) Health	users pay us for), where such users are required to retain such data by law)	the EU) are engaged as a third party to store data and host our application and website
To administer and protect our business and our website (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	Microsoft Azure Cloud Services (based within the EU) are engaged as a third party to store data and host our application and website
To deliver relevant content to you and measure or understand how you use our website, including the use of data analytics	(a) Identity (b) Contact (c) Profile (d) Usage (e) Communications (f) Technical	Necessary for our legitimate interests (to study how users use our website, to develop them, to grow our business and to inform our marketing strategy)	Microsoft Azure Cloud Services (based within the EU) are engaged as a third party to store data and host our application and website  We use Google Analytics and other similar analytics services (who may be based inside or outside the EU) within our

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Third party processing and international transfer information
			website and mobile application to track page views, source information, generic session information and error logs

## **Marketing**

We have a 'Contact Us' section on our website which enables you to request details of our services. Where you do so, we will respond with marketing information as appropriate in the context of your enquiry. We will not send you any unsolicited marketing communications.

## **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 our website may become inaccessible or not function properly. For more information about the cookies we use, please [contact us](#).

## **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.

## **DISCLOSURES OF YOUR PERSONAL DATA**

Our business users (with whom you are engaged to provide services to) may share your personal data with other business users (who you may not necessarily have a direct relationship with) via our mobile application as they deem appropriate. If you do not want your personal data to be shared in this way, please do not input it into the mobile application. You should check the privacy policy of any businesses with whom you engage with for further information as to the terms of their data processing practices.

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Specific third parties listed in the table above.
- 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 notice.

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.

## INTERNATIONAL TRANSFERS

Some of our external third parties are based outside the European Economic Area (**EEA**) so their processing of your personal data will involve a transfer of data outside the EEA.

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

- We may transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [\*European Commission: Adequacy of the protection of personal data in non-EU countries\*](#).
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [\*European Commission: Model contracts for the transfer of personal data to third countries\*](#).
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see [\*European Commission: EU-US Privacy Shield\*](#).

Please [contact us](#) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## 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.

## DATA RETENTION



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

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 requirements.

Details of retention periods for different aspects of your personal data are available on request by [contacting us](#).

By law we have to keep basic information about our business users (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

We will retain information about our individual users as directed by our business users. Our business users may need to retain Health Data in relation to individual users for a certain time period in order to comply with their legal obligations. They may retain such data using our mobile application or they may export it from our mobile application and store it elsewhere. We recommend that our individual users check the privacy policy of any business users with whom they engage for further information in relation to retention periods.

In some circumstances you can ask us to delete your data: see Request erasure below for further information.

In some circumstances we may 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.

## **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.](#)
- [Request correction of your personal data.](#)
- [Request erasure of your personal data.](#)
- [Object to processing of your personal data.](#)
- [Request restriction of processing your personal data.](#)

- [Request transfer of your personal data.](#)
- [Right to withdraw 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 may 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 may 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.

## **GLOSSARY**

### **LAWFUL BASIS**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#).

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

## YOUR LEGAL RIGHTS

You have the right to:

**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: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**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.