innDex End User (contractor) Privacy Policy

innDex Limited is committed to protecting your personal data and respecting your privacy.

Introduction

This policy (together with our *Terms of Use* applies to your use of any of the innDex Technology, being:

- our iOS or Android mobile application (“**App”**),
- our website at *https://www.inndex.co.uk* (“**Website**”), and
- our web portal accessed via our Website (“**Web Portal**”).

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. The innDex Technology is not intended for children and we do not knowingly collect data relating to children.

Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

This policy is provided in a layered format so you can click through to the specific areas set out below.

Important information and who we are

The data we collect about you

How is your personal data collected?

How we use your personal data

Disclosures of your personal data

International transfers

Data security

Data retention

Your legal rights

Glossary

Description of categories of personal data

Important information and who we are

innDex Limited is the controller and is responsible for your personal data (collectively referred to as "**Company**", "**we**", "**us**" or "**our**" in this policy).

1. Contact details

We have appointed a data privacy manager. If you have any questions about this privacy policy, please contact them using the details set out below.

innDex Limited
Hafod Wen
Llanddona
Beaumaris LL58 8UU

United Kingdom

Email: support@inndex.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.

2. Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review.

This version was last updated on 30 January 2024. It may change and if it does, these changes will be posted on this page and, where appropriate, notified to you by email or when you log into the innDex Technology. The new policy may be displayed on-screen and you may be required to read and accept the changes to continue your use of the innDex Technology.

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 our relationship with you.

3. Third party links

The innDex Technology may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. Please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these third-party websites or services, such as contact and location data**.** Please check these policies before you submit any personal data to these third-party websites or use their services.

4. The data we collect about you

We may collect, use, store and transfer different kinds of personal data about you as follows:

- **Identity Data**: first name, last name, username or similar identifier, next of kin, competencies, professional certifications, employer, job role.
- **Contact Data**: address, email address and telephone numbers.
- **Device Data:** includes the type of mobile device you use, a unique device identifier (for example, your Device's IMEI number, the MAC address of the Device's wireless network interface, or the mobile phone number used by the Device), mobile network information, your mobile operating system, the type of mobile browser you use, time zone setting.
- **Content Data:** includes information stored on your Device, including login information or other digital content (text, images, video, audio) that you input or upload to the innDex Technology.
- **Profile Data**: includes your login information (including your password), and any settings you have selected in the innDex Technology, plus your feedback and survey responses.
- **Usage Data**: includes details of your use of any of our innDex Technology including, but not limited to, traffic data, data about your communications with us, and data that logs how you use the innDex Technology.
- **Marketing and Communications Data**: includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Location Data**: includes your current location disclosed by GPS technology.

- **Health Data**: includes information about any medical conditions that you have, plus information about any medications that you take to treat those conditions.
- **Biometric Data:** we may create a biometric template of your face from the image that you provide to us as a profile picture, or using a facial recognition reader.

We also collect, use and share aggregated data such as statistical or demographic data for any purpose.

Aggregated data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. It is data that relates to you that is combined with data relating to other users in a way that does not identify any individual user. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific App feature.

However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

5. Special Categories of Personal Data

Under data protection law, there are Special Categories of Personal Data (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).

Health special category data: We collect some information about your health (including any health conditions that affect your ability to work and any accommodations that you need, plus details of any medications that you take).

Biometric special category data: We also collect and use biometric data as part of a facial recognition system. When you are inducted onto a site, we may create a biometric template of your face from the image that you provide to us as a profile picture or using a facial recognition reader. We use this biometric template for the purpose of verifying your identity (so when you visit site, you will scan your face into a facial recognition reader and this will be used to check your identity, control your access on site, and/or record your timekeeping on site).

If you do not consent to us processing your biometric data, we will provide you with an alternative means of verifying your identity.

We do not collect any other Special Categories of Personal Date, or any information about criminal convictions and offences.

6. How is your personal data collected?

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

- **Information you give us.** This is information (including Identity, Contact, Marketing and Communications, and Health Data) you consent to giving us about you by filling in forms on the App, Web Portal or Website, or by corresponding with us (for example, by email or chat). It includes information you provide when you download the App, register to use any of the innDex Technology, complete your profile information, or use any of the messaging functionality in the innDex Technology, or when you report a problem with any innDex Technology. If you contact us, we will keep a record of that correspondence.
- **Biometric data.** You will either upload a digital image of your face when you complete your profile on our App or Web Portal, or you will scan your face into a facial recognition reader on a work site which will save a digital image of your face. We will then use technology to create a biometric template of your face, which will either be stored on our servers, or locally on the facial recognition reader on site.

- **Information we collect about you and your device.** Each time you use the innDex Technology we will automatically collect personal data including Device, Content and Usage Data. We collect this data using cookies and other similar technologies. Please *see our cookie policy* for further details.
- **Location Data.** We also use GPS technology to determine your current location. Some of our location-enabled services require your personal data for the feature to work. If you wish to use the particular feature, you will be asked to consent to your data being used for this purpose. You can withdraw your consent at any time by turning off Location Data settings on your device.
- **Information we receive from third party sources.** We will receive personal data about you from third parties as set out below:
    - Device, Profile and Location Data from analytics providers such as Google, Zoho and Linkedin based outside the UK; and
    - Identity Data from cookie software providers such as WebToffee based inside the UK.

7. Cookies

We use cookies and/or other tracking technologies to distinguish you from other website visitors and to remember your preferences. This helps us to provide you with a good experience when you use our website and also allows us to improve the website.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- **Analytical or performance cookies.** These allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. [We may also share this information with third parties for this purpose.]

You can find more information about the individual cookies we use, the purposes for which we use them, and how long they stay on your browser, in the table below.

Please note that some of the cookies are placed by third parties, over which we have no control. These named third parties include, for example, providers of external services like web analytics or digital marketing. These third party cookies are likely to be analytical cookies or performance cookies or targeting cookies.

Turning off cookies

You can use your browser settings to block cookies (including essential cookies), however, you may not be able to access all or parts of our Website if you do this.

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Cookies we use

We use the following cookies:

Cookie name	Issued by	Purpose of cookie	How long it lasts	More info
cookielawinfo-checkbox-necessary	inndex.co.uk	Set by the GDPR Cookie Consent plugin, this cookie is used to record the user consent for the cookies in the "Necessary" category .	1 year	N/A
cookielawinfo-checkbox-functional	inndex.co.uk	The cookie is set by the GDPR Cookie Consent plugin to record the user consent for the cookies in the category "Functional".	1 year	N/A
cookielawinfo-checkbox-performance	inndex.co.uk	Set by the GDPR Cookie Consent plugin, this cookie is used to store the user consent for cookies in the category "Performance".	1 year	N/A
cookielawinfo-checkbox-analytics	inndex.co.uk	Set by the GDPR Cookie Consent plugin, this cookie is used to record the user consent for the cookies in the "Analytics" category .	1 year	N/A
cookielawinfo-checkbox-advertisement	inndex.co.uk	Set by the GDPR Cookie Consent plugin, this cookie is used to record	1 year	N/A

		the user consent for the cookies in the "Advertisement" category .		
cookielawinfo-checkbox-others	inndex.co.uk	Set by the GDPR Cookie Consent plugin, this cookie is used to store the user consent for cookies in the category "Others".	1 year	N/A
_ga	Google Analytics	The _ga cookie, installed by Google Analytics, calculates visitor, session and campaign data and also keeps track of site usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognize unique visitors.	1 year 1 month 4 days	https://policies.google.com/privacy
_gid	Google Analytics	Installed by Google Analytics, _gid cookie stores information on how visitors use a website, while also creating an analytics report of the website's performance. Some of the data that are collected include the number of visitors, their source, and	1 day	https://policies.google.com/privacy

		the pages they visit anonymously.		
_gat_gtag_UA_*	Google Analytics	Google Analytics sets this cookie to store a unique user ID.	1 minute	https://policies.google.com/privacy
_ga_*	Google Analytics	Google Analytics sets this cookie to store and count page views.	1 year 1 month 4 days	https://policies.google.com/privacy
elementor	Elementor for Wordpress	This cookie is used by the website's WordPress theme. It allows the website owner to implement or change the website's content in real-time.	never	https://elementor.com/about/privacy/
YSC	.youtube.com	YSC cookie is set by Youtube and is used to track the views of embedded videos on Youtube pages.	session	https://policies.google.com/privacy
VISITOR_INFO1_LIVE	.youtube.com	A cookie set by YouTube to measure bandwidth that determines whether the user gets the new or old player interface.	5 months 27 days	https://policies.google.com/privacy

CONSENT	.youtube.com	YouTube sets this cookie via embedded youtube-videos and registers anonymous statistical data.	2 years	https://policies.google.com/privacy
yt-remote-device-id	youtube.com	YouTube sets this cookie to store the video preferences of the user using embedded YouTube video.	never	https://policies.google.com/privacy
yt.innertube::requests	youtube.com	This cookie, set by YouTube, registers a unique ID to store data on what videos from YouTube the user has seen.	never	https://policies.google.com/privacy
yt.innertube::nextId	youtube.com	This cookie, set by YouTube, registers a unique ID to store data on what videos from YouTube the user has seen.	never	https://policies.google.com/privacy
yt-remote-connected-devices	youtube.com	YouTube sets this cookie to store the video preferences of the user using embedded YouTube video.	never	https://policies.google.com/privacy
_zcsr_tmp	Zoho	Zoho sets this cookie for the login function on the website.	session	https://www.zoho.com/privacy.html

b3e783bb62	Zoho	This cookie is set by the provider Zoho. This cookie is used for collecting information on user interaction with the web-campaign content. This cookie helps the website owners to promote products and events on the CRM-campaign-platform.	session	https://www.zoho.com/privacy.html
crm.zohopublic.eu	Zoho	Strictly necessary for functionality of Zoho CRM system	session	https://www.zoho.com/privacy.html
crmcsr	Zoho	Strictly necessary for functionality of Zoho CRM system	session	https://www.zoho.com/privacy.html
LS_CSRF_TOKEN	Zoho	Cloudflare sets this cookie to track users' activities across multiple websites. It expires once the browser is closed.	session	https://www.zoho.com/privacy.html
uesign	Zoho	Zoho sets this cookie for the Visitor Live Chat.	1 month	https://www.zoho.com/privacy.html

8. How we use your personal data

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

- Where you have consented before the processing.
- Where we need to perform a contract we are about to enter or have entered 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.

We will only send you direct marketing communications by email or text if we have your consent. You have the right to withdraw that consent at any time by contacting us.

We will only use your biometric data for the purposes set out in Section 9 below and only if we have your consent. You have the right to withdraw that consent at any time by contacting us.

9. 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 basis 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**
To install the App and register you as a new App user, or to register you as a new user of the Web Portal	Identity Contact Device	Your consent
To give you access to, and usage of, the innDex Technology	Identity Contact Device Location	Your consent Performance of a contract with you
To manage our relationship with you including notifying you of changes to the innDex Technology	Identity Contact Profile Marketing and Communications	Your consent Performance of a contract with you Necessary for our legitimate interests (to keep records updated and to analyse how customers use our products/ Services) Necessary to comply with legal obligations (to inform you of any changes to our terms and conditions)
To enable you to participate in a survey	Identity Contact Device	Your consent Necessary for our legitimate interests (to analyse how End Users use our services and to

	Profile Marketing and Communications	develop them and grow our business)
To administer and protect our business and the innDex Technology including troubleshooting, data analysis and system testing	Identity Contact Device	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security)
To use data analytics to improve our technology, products/services, marketing, customer relationships and experiences	Device 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 products or services that may be of interest to you	Identity Contact Device Profile Usage Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)
Facial recognition: To identify you as a worker on a particular site (including controlling access to site and recording timekeeping on site)	Profile Biometric	Your consent

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.

10. Disclosures of your personal data

When you consent to providing us with your personal data, we will also ask you for your consent to share your personal data with the third parties set out below for the purposes set out in the table *Purposes for which we will use your personal data*:

- Third Parties as set out in the *Glossary*:

- 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.

11. International transfers

Many of our external third parties are based outside the UK so 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. For further details, see *this information from the Information Commissioner's Office*.
- Where we use certain service providers, we may use specific contracts approved by the UK which give personal data the same protection it has in the UK. For further details, see *this information from the Information Commissioner's Office*.

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

12. Data security

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password that enables you to access certain parts of the innDex Technology, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

We have put in place appropriate procedures and security features to try to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, including encrypted storage, access controls to limit who has access to your data, logging and monitoring, and firewalls.

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.

As part of our App functionality, we may collect and store personal data on your Device. This data may be stored in various ways, including application data caches, browser web storage (including HTML5), and other technologies that allow for local storage within the App. Data stored locally is wiped upon logging out of the App and/or App deletion.

Your biometric data (the biometric template that is generated from an image of your face) may also be stored locally on the facial recognition reader.

Additionally, we may also collect and store personal data on our servers, which are hosted in secure data centres and protected by industry-standard security measures. This data may be used for purposes such as improving the App's functionality, analysing App usage, and providing customer support.

You control what content you input into the innDex Technology. Particularly when using features like messaging, please ensure that you do not submit any personal data that you do not want to be seen, collected or used by other users.

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

13. Data retention

By law we have to keep basic information about our innDex Technology users (including limited Contact and Identity Data) for six years after they cease being end users for accounting and other legal purposes. Otherwise, we will typically delete your data within 6 months of you ceasing to be a user.

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.

14. Your legal rights

Under certain circumstances you have the following 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 or your personal data*
- *Right to withdraw consent*

You also have the right to ask us not to continue to process your personal data for marketing purposes.

You can exercise any of these rights at any time by *contacting us here*.

15. Glossary

(a) Lawful basis

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

Consent means processing your personal data where you have signified your agreement by a statement or clear opt-in to processing for a specific purpose. Consent will only be valid if it is a freely given, specific, informed and unambiguous indication of what you want. You can withdraw your consent at any time by contacting us.

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.

(b) Third parties

Service providers acting as processors, including AWS, Google, Zoho, Jira, Survey Monkey, WebToffee, Slack based in the UK and other countries worldwide including the United States, who provide cloud hosting and software services to us.

Service provider Almas industries, acting as processor, which provides facial recognition readers and software that generates a biometric template from your face.

Professional advisers acting as processors or controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services to us.

HM Revenue and Customs, regulators and other authorities acting as controllers based in the UK who require reporting of processing activities in certain circumstances.

(c) 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. If you withdraw consent to processing of your biometric data, we will provide you with an alternative means of verifying your identity.