

Thomsons Online Benefits: Privacy Policy

Thomsons Online Benefits Limited ("Thomsons", "our" or "we") are committed to protecting and respecting your privacy.

This Privacy Policy (together with our terms & conditions and any other documents referred to on it) sets out the basis on which any personal data we collect from you or your employer ("your Employer"), or that you provide to us, through our website will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By using our website, you are accepting and consenting to the practices described in this policy.

We provide a website portal for your Employer in order to manage your benefits (Site). For the most part, where we collect or use your information we are doing so on behalf of Your Employer and in accordance with your Employer's instructions

Information we may collect from you

- We collect information about you when:
 - your account is set up and activated by Your Employer;
 - your account information is updated by Your Employer;
 - you submit or update your personal details through the Site; and
 - we receive information from your benefit provider.
- This may include your name, date of birth, gender, National Insurance number, bank details, address, e-mail address and phone number, salary and employment details, information about other members of your household or family, for example, family members who may be included on a health insurance policy;
- If you contact us by other means, for example by email, post or telephone, we may collect the information you provide to us.
- We may collect sensitive personal information about you only with your explicit consent or where you have specifically provided this information to us. Sensitive Personal Data includes information regarding racial/ethnic origin, political opinions, religious beliefs, membership of a trade union, physical/mental health, sexual life, commissioning/alleged commissioning of any offence.
- With regard to each of your visits to our Site we may automatically collect the following information:
 - technical information, including the internet protocol ("IP") address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
 - information about your visit, including the full Uniform Resource Locators ("URL") clickstream to, through and from our Site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

Information collected from third parties

- Data we are provided from your Employer and your benefit providers may be combined with data you enter on the Site. We are also working closely with third parties (including, for example, business partners, benefit providers, sub-contractors in technical and delivery services, analytics providers and may receive information about you from them.

Uses made of the information

We use information held about you in the following ways:

- to carry out our obligations arising from any contracts entered into between (any two or more of) you, your Employer, a benefit provider and us;
- to provide you with the information, products and services contained within the Site;
- to provide you with information about other services we offer that are similar to those that you have already purchased or enquired about;
- where you have indicated your consent, information about third party products and services which we think may be of interest to you;
- to notify you about changes to our service;
- to improve the Site and ensure that content from our Site is presented in the most effective manner for you and for your computer;
- to administer our Site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our Site safe and secure;
- for the purposes of analysing the use of the Site;

Information about you or your use of the Site, and the services within the Site, may be used and analysed for the testing of our services or for other purposes (such as market research purposes), provided that an individual cannot be identified from such data.

Disclosure of your information

We may share your personal information with any member of our group. We may also share your data with Your Employer or third party providers whose services are listed on the Site in order to provide our services to you. We may carry out analysis on your use of the Site and the services and share this in an aggregated form with your Employer. This data will be anonymised and you will not be identified from such data.

We may disclose your information to third party suppliers or service providers to conduct our business, for example, to help us store data, carry out analytics services or manage our systems etc. These third party providers may use your data for the purposes of carrying out or facilitating our services. We have implemented safeguards to ensure that our service providers treat personal information in a way that is consistent with the terms of this Privacy Policy and applicable laws.

We may also disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If Thomsons or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions and other agreements; or to protect the rights, property, or safety of Thomsons, our customers, or others. This includes

exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We will share information only as anticipated within this Privacy Policy and wherever appropriate, try to limit disclosure to information in aggregated form, to avoid or limit identifying you personally. We will not voluntarily share, rent or sell it outside Thomsons, except as necessary to carry out our business or meet your needs.

Personal information of others

If you give us information about another person (for example a family member), it is your responsibility to ensure and confirm that:

- you have told the individual who we are and how we use personal information (as set out in this Privacy Policy); and
- you have permission from this individual to provide their personal information (including any sensitive personal data) to us and for us to process it, as set out in this Privacy Policy.

Where we store your personal data

As we operate via a global network of corporate offices, it may be necessary to transfer your information to a country outside of the country where it was originally collected or outside of your country of residence or nationality, including outside of the European Economic Area.

As privacy laws in other countries may not be equivalent to those in your home country, we only make arrangements to transfer data overseas where we are satisfied that adequate levels of protection are in place to protect any information held in that country or that a service provider acts at all times in compliance with applicable privacy laws. Where required under applicable laws we will take measures to ensure that personal information handled in other countries will receive at least the same level of protection as it is given in your home country.

Update Your Information

Any information on our Site that appears incorrect and cannot be amended should be raised with Your Employer who will instruct Thomsons to correct this.

Security

We are committed to protecting the confidentiality and security of the information that you provide to us and we put in place appropriate technical, physical and organisational security measures to protect against any unauthorised access or damage to, or disclosure or loss of, your information.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Our Site may, from time to time, contain links to and from the websites of third party providers. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these providers.

Access to information

You have the right to access information held about you. In the first instance you should contact your Employer, as the data controller, for access to information we hold about you. We will provide reasonable assistance to your employer in collating the information requested. Any access request may be subject to a fee of £10 to meet the costs in providing you with details of the information held about you.

Cookies

Our Site uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you use the Site and also allows us to improve our Site. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. You have the ability to accept or decline cookies by modifying the setting in your browser. If you would like to do this, please see the help menu of your browser.

We use the following types of cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our Site. They include, for example, cookies that enable you to log into our secure Site.
- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our Site when they are using it. This helps us to improve the way our Site 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 Site. 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.

Acceptance

By continuing to use the Site you accept to our processing of your personal information as per this Privacy Policy and to the use of cookies as outlined.

Changes to our privacy policy

Any changes we may make to our Privacy Policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our Privacy Policy.

Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to information.security@thomsons.com.