



## Privacy Notice

Glow Technologies Limited ("**Glow**", "**we**", "**our**", or "**us**") has created a digital voucher solution which we operate either through our website, platform and associated applications, collectively known as ("**Glow Software**") or manually.

This Privacy Notice governs those who access and use our Glow Software as an authorised user ("**Authorised User**"), those who are visitors to the Glow website and those who use our Glow services ("**Glow**") generally.

### Overview

At Glow, we take privacy very seriously. We have prepared this privacy notice ("**Privacy Notice**") to ensure that we communicate to you, in the clearest way possible, how we treat your personal information. We encourage you to read this Privacy Notice carefully as it governs the use of Glow.

We are committed to ensuring that your personal information remains confidential and secure in accordance with applicable Data Protection Legislation.

This notice sets out how we look after your personal data if you are: a voucher recipient; responsible for a voucher recipient; an authorised user of the Glow Software; a supplier, retailer or business contact of Glow; a public or government body.

This Privacy Notice (together with any terms of service, website terms of use and any other documents or terms incorporated by reference) describes the types of information that we collect from you through the use of Glow and our products and services available to you, and how that information may be used or disclosed by us and the safeguards we use to protect it. The personal information that we collect is used for providing and improving our Services. We will not use or share your information with anyone except as described in this Privacy Notice.



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 your relationship with us.

We may update this notice from time to time, and you can find our latest notice on our website or by requesting a copy at [data@wonde.com](mailto:data@wonde.com).

## **Who is Glow?**

Glow Technologies Limited is a company incorporated in England and Wales, with company number 15491298 referred to as **"we"** **"us"** **"our"** and/or **"Glow"** in this privacy notice.

Our address is Furlong House, 2 Kings Court, Newmarket, Suffolk, England, CB8 7SG.

We have a Data Protection Officer 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 Data Protection Officer as follows:

Address: Furlong House, 2 Kings Court, Newmarket, Suffolk, England, CB8 7SG

Email address: [data@wonde.com](mailto:data@wonde.com)

The ICO registration number for Glow Technologies Limited is: **ZB691367**

We will only process personal information about you in accordance with the UK **"Data Protection Legislation"** which for the purposes of this Privacy Notice shall mean: all applicable data protection and privacy legislation in force from time to time in the UK including without limitation the UK GDPR; the Data Protection Act 2018 (and regulations made thereunder) and the Privacy and Electronic Communications Regulations 2003 (SI 2003/2426) as amended; and all other legislation and regulatory requirements in force from time to time which apply to a party relating to the use of personal data (including, without limitation, the privacy of electronic communications); and the guidance and codes of practice



issued by the Commissioner or other relevant regulatory authority and which are applicable to a party.

## **The purpose of this Privacy Notice**

The purpose of this Privacy Notice is to set out how we collect and use your personal data when we directly control the personal data as a data controller in respect of Glow and the Glow Software.

### **The data we collect**

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 depending on your relationship with us (for instance, whether you are a voucher recipient, a local authority or a professional contact) as follows:

- **Identity Data:** includes first name, maiden name, last name, username or similar identifier, marital status, unique pupil number, title, and date of birth.
- **Financial Information:** the value of vouchers provided; details of the vouchers requested; bank account details or credit card information, if appropriate for payment information, postal address.
- **Contact Data:** your email address, telephone number and postal address.
- **Relatives Data:** the name(s) of any parent(s), legal guardians /or child or children, contact/court orders, parental responsibility and priority contact data.
- **Transaction Data** that may include details about payments we receive.
- **Technical Log 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 the Glow Software.

- **Profile Data** includes your authorised username and password, orders made by you (if applicable), complaints, preferences, and any feedback responses.
- **Usage Data** includes information about how you use the Glow Software, its products and services.
- **Cookies Data** Like many websites, we may use some "cookies" to enhance your experience and gather information about the visitors and number of visits to the Glow Software. Please refer to the Cookie Policy on our website for more information.
- **Third Parties and Information We Receive from Other Sources** We may receive information about you if you use any of the other websites we operate or via other services we provide. In this case, we will have informed you when we collected that data, that it may be shared internally and combined with data collected on Glow.
- **Characteristic and Demographic Data** includes information about whether a voucher recipient, for example, a pupil who may be entitled to free school meals, a holiday participation scheme, a security PIN for pick up, or any other kind of voucher.
- **Analytics** includes third-party analytics services (such as Google Analytics) to evaluate your use of Glow and our Glow Software, compile reports on activity, collect demographic data, analyse performance metrics, and collect and evaluate other information relating to our website and internet usage. These third parties use cookies and other technologies to help analyse and provide us with the data. By accessing and using the Glow Software, you consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Notice.

You can withhold your personal data from us, but we may not be able to provide our services to you if you do so.

## How we collect data



We may collect your personal data from different sources:

- We collect all of the types of data listed above directly from you when you interact with us. This includes when you register or use Glow or one of our other platforms (including our applications), and when you log in to these.
- We collect Identity Data, Contact Data, Relatives Data, and Characteristic and Demographic Data from the buyer of Glow services (including but not limited to a business, local authority, housing association or a school you are connected to).
- We collect Technical Data automatically when you interact with the Glow Software, by using cookies and other similar technologies.

## **How we use your personal data**

We (or third-party data processors, agents and sub-contractors acting on our behalf) may collect, store and use your personal information by way of different methods to collect data from and about you including through:

**Direct interactions.** This is information (including Identity, Contact and Financial Data) you consent to giving us about you when you fill in forms through the Glow Software or send to us directly, or by corresponding with us (for example, by email or chat). It includes information you provide when you register or subscribes to any of our services through the general use of Glow, visit or use the Glow Software, login to our mobile application or when you create an account with us and finally when you report a problem with our services or Glow. If you contact us, we will keep a record of that correspondence.

**Information we collect about you and your device either automated or otherwise.** Each time you visit or use the Glow Software, we will automatically collect personal data including Technical Log Data. We collect this data using cookies and other similar technologies including server logs. We may also receive technical data about you if you visit other websites employing our cookies. We may also collect Technical Log Data if you contact us and use our services generally through Glow.

**Information we receive from other sources including third parties and publicly available sources.** We may receive personal data about you from various third



parties such as your employer, government bodies, local authorities or schools and education establishments, but we will only use the personal data where we are allowed to do so and to enable us to provide Glow services to you.

There may also be occasions where we are required under law to disclose specific personal information about you to the local authority or government body in the provision of our services. We will only do this where we are allowed to do so, or where you have consented to this processing.

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, which include strict confidentiality and contractual terms.

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.

When we are acting as a data controller, we will use your personal data for the purposes set out in the table below.

<b><u>The purpose for using your data</u></b>	<b><u>Legal ground for using your data for this purpose</u></b>
To allow you to access your account on the Glow Software and to register an account with us (including but not limited to any mobile application account). To enable access to Glow via a link or text message if you are a voucher recipient. To enable you to receive the benefit of Glow.	Necessary for our legitimate interests (to allow those with an account on the Glow Software to use it) / Performance of a contract with us. To comply with a legal obligation / To perform a task carried out in the public interest.
To manage any account and deliver Services, including managing	Necessary for our legitimate interests (to recover debts due to us and for payment for Services) / Performance

payments and collecting money owed to us.	of a contract with us / To perform a task carried out in the public interest.
To enable communication in the provision of the Services.	Necessary for our legitimate interests (to allow local authorities, other relevant organisations who use Glow, staff, retailers and voucher recipients to use Glow).
To provide support to you when you contact us	Necessary for our legitimate interests (to respond to support calls as our users would expect)/ To perform a task carried out in the public interest/ To comply with a legal obligation.
To manage our relationship with you, which will include notifying you about changes to our Privacy Notice, and any correspondence with you.	Necessary for our legitimate interests (to provide important updates to our users). / To enter into and/or perform a contract with you.
Where you are a supplier of Glow or a retailer, on the Glow Software	Necessary for our legitimate interests (to make purchases of our goods and services).
To administer and protect our business and the Glow Software (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	Necessary for our legitimate interests (to protect our business, software and website; to keep our services updated).
To deliver relevant system, software and website content and advertisement and promotional activity to measure or understand the effectiveness of the business.	Necessary for our legitimate interests (to study how Authorised Users use our products/services, to develop them, to grow our business and to inform our marketing strategy).
To use data analytics to improve our Website, products/services, marketing,	Necessary for our legitimate interests (to continuously improve our services for our customers and users).

customer relationships and experiences.	
To create anonymous aggregated data, as set out below.	Necessary for our legitimate interests (to provide additional benefits and functionality to our customers and users without disclosing personal data).
To comply with applicable laws and regulatory obligations.	To comply with a legal obligation.
To provide data to third-party providers of Evoucher's Services	Necessary for our legitimate interests (to provide products and services to users). / To enter into and/or perform a contract with you.

### Aggregated Data

We may aggregate and use non-personally identifiable data we have collected from you and others. This data will in no way identify you or any other individual.

We may use this aggregated non-personally identifiable data to:

- assist us to better understand how our users are using the Glow Software and services;
- provide users with further information regarding the uses and benefits of Glow; and
- otherwise to improve our Glow Software.

### Cookies When using the Glow Software

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 the Glow Software may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy





## **Who has access to your personal data and who do we share it with?**

We may need to share your personal data when using your personal data as set out in the table above. We may share your personal data with the following third parties:

- Our professional advisers, including lawyers, auditors and insurers.
- Service providers who provide IT and system administration services, or who store data on our behalf.
- 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.
- Local Authorities of Government bodies who require access to your personal data to facilitate the provision of Glow.
- Third parties who require access to your personal data to facilitate the provision of Glow products and services. Such as customer management software, prepaid card providers, retailers and postal marketing agencies

Where any of your personal data is required for such a purpose, we will take all reasonable steps to ensure that your personal data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under the Data Protection Legislation. This type of external data processing is always subject to contractual assurances that personal data will be kept securely and used only in accordance with our specific directions.

## **International Transfers**

Subject to us complying with Data Protection Legislation and ensuring appropriate safeguards are in place, we may transfer your personal data to third parties providing services to us who are based outside of the UK without obtaining your specific written consent. This may include parties providing IT administration

services and hosting services, and parties providing assistance with managing our marketing databases.

Whenever we transfer your personal data outside 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:

- (a) the personal data is transferred to or processed in a territory which is subject to adequacy regulations under the Data Protection Legislation that the territory provides adequate protection for the privacy rights of individuals such as the EEA; or
- (b) we participate in a valid cross-border transfer mechanism under Data Protection Legislation so that we (and, where appropriate, the buyer (whether that be a business, school, education establishment, local authority or any other relevant organisation using our Services)) can ensure that appropriate safeguards are in place to ensure an adequate level of protection with respect to the privacy rights of individuals as required under the UK GDPR; or
- (c) the transfer otherwise complies with Data Protection Legislation.

## **Retention period**

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.

For more details on our specific retention periods, please contact our Data Protection Officer.

## **Data Security**



Data security is of great importance to us, and to protect your data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure data collected through Glow and the Glow Software.

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.

Notwithstanding the security measures that we take, it is important to remember that the transmission of data via the Internet may not be completely secure and that you are advised to take suitable precautions when transmitting to us data via the Internet and you take the risk that any sending of that data turns out to be not secure despite our efforts.

## **Your rights as a data subject**

Under certain circumstances, you have rights under the Data Protection Legislation in relation to your personal data. These rights are set out below. If you wish to exercise any of the rights set out below, please contact our Data Protection Officer.

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.

Your rights are as follows:

- **Right of access** – you have the right to request a copy of the personal data that we hold about you and to check that we are lawfully processing it.
- **Right of rectification** – you have a right to request that we correct personal data that we hold about you that is inaccurate or incomplete.
- **Right to be forgotten/erased** – in certain circumstances, you can ask for the data we hold about you to be erased from our records i.e. when there is no good reason for us continuing to process it.
- **Right to restriction of processing** – where certain conditions apply, you have a right to restrict or suspend the processing, for example, if you want us to establish its accuracy or the reason for processing it.

- **Right of portability** – you have the right to have the data we hold about you transferred to another organisation.
- **Right to object** – you have the right to object to the 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.

There are some exceptions to the above rights.

- **Right to withdraw consent.** In the limited circumstances where you have provided your consent to the collection, processing and transfer of the personal data referred to above, you may withdraw that consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent, or to processing carried out on other legal grounds. 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.

All of the above requests will be forwarded to the relevant party should there be a third party involved in the processing of your personal data.

### **Complaints to the Information Commissioner's Office**

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 by emailing us at [dpo@wonde.com](mailto:dpo@wonde.com).