

# WiderPlan

## Privacy Policy

Wider Plan is owned and administered by Wider Plan Ltd, a friendly family company which is committed to protecting your privacy and the security of your personal information.

In providing you with access to our services, we may have cause to collect and process your personal information. This Privacy Policy explains the ways in which we may collect, use, store and analyse your personal information, as well as outlining the steps we take to protect your privacy.

Please read this policy carefully before using our services. Use of our sites and services signifies your acceptance of this policy.

### 1. How we may collect your personal information

- 1.1 We may collect any personal information which you provide to us voluntarily, for example by completing a form on any of our websites or in hard copy, by taking part in a phone conversation or by emailing us.
- 1.2 If access to our services is provided to you by your employer or by a membership organisation, we may also collect personal information which is provided to us by your employer or membership organisation.
- 1.3 Our systems may automatically record information about your website usage, such as your browser type (eg Internet Explorer), operating system (eg Microsoft Windows), IP address (a way of identifying your internet connection) and basic information about your internet service provider. This information does not require your intervention and is used to improve our services and enhance your user experience.
- 1.4 For security and audit control, and to help us understand your preferences, we may also keep a record of when you access the site, which pages you visit and the actions you take on each page.

### 2. How we may use your personal information

- 2.1 We respect your privacy and will only use your information in the following ways:
  - i) To register you as a user and to provide the services you require.
  - ii) To provide you with customer support.
  - iii) To enhance the accuracy of the information which we hold about you and which your employer or membership organisation (as applicable) holds about you.
  - iv) To advise your employer or membership organisation (as applicable) of your registration
  - v) To notify you of any important changes to the site.
  - vi) To prevent potentially prohibited or illegal activities and enforce our Terms and Conditions.
  - vii) To monitor and improve our services and to personalise our website for you.
  - viii) To keep you informed of any products, services or offers which might be of interest to you.
  - ix) For internal research purposes, general website administration and demographic analysis of our service users.

### 3. How we may share your personal information

- 3.1 Where access to our services is provided to you by your employer or membership organisation, we may share relevant information (such as contact details, date of birth and payroll or membership number, and any product specific orders which are to be processed via payroll) with your employer or membership organisation in order to improve the accuracy of our respective records.
- 3.2 In the event of our site providing you with an opportunity to browse products or services, we will not provide your employer or membership organisation with specific details of your browsing activity. However, this information may be shared with your employer or membership organisation in the form of group level statistics which will not include any information which could personally identify you.
- 3.3 We will not share any of your personal information with any other third parties without your permission, unless:
  - i) We suspect any form of illegal behaviour.
  - ii) It is necessary by law, regulation or legal proceedings.
  - iii) It is required to enforce our Terms and Conditions.
  - iv) We feel that it is a necessary action to protect the property, rights or safety of Wider Plan or any other party.
  - v) The third party is acting in a professional capacity, for example as a regulator or auditor, and has suitable confidentiality and privacy measures in place.
  - vi) The third party is acting as an approved fulfilment partner for an order you have placed.
- 3.4 We may provide third parties with non-personal statistical data, for example relating to the size of our customer base and the levels of site usage. This will only be group data, such as the age range of site users, and will not include any information that could personally identify you.

### 4. How long we hold personal data

- 4.1 We will only keep your personal information for as long as is necessary for the purposes outlined in this Privacy Policy. Copies of your data may also be retained to satisfy legal, regulatory and accounting requirements.

### 5. How we use cookies

- 5.1 Our website may use cookies to store information about your site usage. A cookie is a small text file that is sent to your browser from a web server and then stored on your hard drive. Cookies enable us to recognise your computer and record information from your visits to the site, such as your preferred settings. This saves you having to re-enter the same data each time you use the site and allows us to provide you with a more customised experience.
- 5.2 We may also use cookies and analytical software to collect anonymous data for internal research purposes, including without limitation:
  - i) To monitor site usage.
  - ii) To keep an audit trail.
  - iii) To understand visitors' browsing habits.
  - iv) To analyse trends and demographic statistics.
  - v) To compile statistical reports.

5.3 Most internet browsers accept cookies by default; however, you can usually change your browser settings to reject cookies if you would prefer not to receive them. If you choose not to receive our cookies you will not be able to receive any personalised features and you may not be able to benefit from all our services.

## 6. Your rights

- 6.1 You have the right to request a copy of any information which we hold about you and to ask for any inaccuracies to be corrected. In order to receive such information, please send your request, including your full contact details, to our registered address.
- 6.2 While we do not normally impose an administration charge for such requests, we reserve the right to impose a reasonable charge to reflect our costs. In such cases, we will seek your agreement to the charge before acting on your request.
- 6.3 Please do contact us if you believe that any information we hold about you is inaccurate, as we are committed to maintaining the high quality of our data.

## 7. Opting out of promotional activity

- 7.1 We will not pass your contact details to third parties for marketing purposes without your consent.
- 7.2 We may contact you periodically with details of our products and services and with information about other products and services which we think you may be interested in. You can choose to opt out of these promotional communications at any time. To opt out, simply send an email to [unsubscribe@widerplan.com](mailto:unsubscribe@widerplan.com), including your name and scheme reference number, or call us on 0800 612 9015.

## 8. Using other websites

- 8.1 Our websites may contain links to web sites which are owned or controlled by parties other than Wider Plan Ltd. These links are provided for your convenience and do not imply that we have reviewed or condoned the third-party sites, their content or their privacy policies.
- 8.2 Our websites may also automatically transfer you to a third party site in order to fulfil your order. In such cases, we will have received the third parties data protection and privacy policy and will have confidence that they third party is abiding by our privacy requirements.
- 8.3 When using third party websites you must be aware that any personal information you supply will be dealt with in line with their own privacy policies. You should check that you agree with each website's privacy policy and Terms and Conditions before giving them any of your personal details.
- 8.4 When you access the linked third party websites, you do so at your own risk. These sites may place their own cookies or other files on your computer, collect data or solicit personal information from you. We will not be held liable for any misuse of your information or other misconduct by the third party.

## 9. Data Security

- 9.1 We are registered under the Data Protection Act and we will only use your data in accordance with the Act.
- 9.2 We take data protection seriously and we have implemented technical, physical and administrative security measures to protect your information against unauthorised access, loss, misuse or destruction. We recommend you always sign off when you finish using a shared computer.

9.3 While we work very hard to protect your privacy, online data transmission can never be entirely secure. Therefore, we cannot guarantee that your personal information will always remain private.

9.4 If we become aware that there has been a security breach and that your personal data may have been compromised, we will contact you as soon as reasonably practical and we will take appropriate steps to rectify the breach.

## 10. Changes to this Privacy Policy

- 10.1 We may change this Privacy Policy at any time. If we make any changes, we will post the new policy on our website.
- 10.2 By using our services you agree to read our Privacy Policy regularly so that you are aware of any changes. Your continued use of the services will constitute your acceptance of these changes.

## Feedback

We welcome all feedback on matters relating to privacy or to any other aspect of our service. You can provide feedback by contacting us at [info@widerplan.com](mailto:info@widerplan.com) or on 0800 612 9015.