



Privacy Policy

1. Who we are

Workplace Bikes is part of the Wider Plan family of products. Wider Plan is committed to protecting your privacy and the security of your personal information.

Registered office: Wider Plan Ltd, 11-16 Chestnut Court, Jill Lane, Sambourne, B96 6EW

Company registration number: 5207145 (England & Wales)

2. Definitions

2.1 The following terms are defined:

- a) "You" and "your" mean the person who is using the Workplace Bikes service.
- b) "We", "us" and "our" mean Wider Plan Ltd, which owns and operates the Workplace Bikes brand.
- c) "Halfords" means Halfords Group Plc.
- d) "Employer" means the organisation which has contracted with Wider Plan and Halfords in order to provide you with access to Workplace Bikes.
- e) The "website" means the Workplace Bikes website at www.workplacebikes.com unless otherwise stated.
- f) "Data Controller" means the party who determines the purpose and means of processing personal data, as per prevailing data protection legislation.

2.2 The headings to clauses are for convenience only and shall not affect the construction or interpretation of these terms.

2.3 Unless otherwise stated,

- a) The singular includes the plural and vice versa;
- b) The words "includes" and "including", and variations thereof, are each without limitation.

3. Our commitment to data protection

This Privacy Policy explains how we lawfully, fairly and transparently use any personal information we collect about you when you use Workplace Bikes.

We are registered as a Data Controller with the Information Commissioner's Office and we will only use your data in accordance with prevailing data protection legislation.

Workplace Bikes schemes are provided as an employer-supported benefit. When an employer enters into a contract with Wider Plan to provide its employees with access to Workplace Bikes, they agree to work with us as a Joint Data Controller for this purpose.

Workplace Bikes schemes are provided in association with Halfords. Halfords acts as a Data Processor, which means they will process your data in accordance with instructions received from us or your employer.

As Joint Data Controllers, Wider Plan and your employer have joint responsibility for deciding how your personal data is processed in respect of Workplace Bikes. Wider Plan and your employer have

agreed to each take responsibility for specific aspects of the data processing, as detailed below.

Wider Plan is usually responsible for managing user registrations, receiving 'Letter of Collection' orders from users, providing salary sacrifice agreements, obtaining employer approval for each order and managing 'end of hire' arrangements.

Your employer is responsible for making any changes to payroll processing, maintaining its employment and payroll records and maintaining an asset schedule.

After receiving an order from a user, we send Halfords the data needed to fulfil the order. Halfords is responsible for issuing 'Letters of Collection' to users, managing redemptions and implementing invoicing and finance arrangements with the employer.

In some cases, Halfords will take responsibility for 'end of hire' arrangements. If your employer selects this option, they will communicate this to you and the related data processing will become your employer's responsibility.

Wider Plan, Halfords and your employer will share your personal data with each other in order to facilitate the necessary processing for Workplace Bikes.

Wider Plan is the primary point of contact for any questions or complaints relating to Workplace Bikes data protection. We will liaise with your employer as necessary to ensure an appropriate response is provided.

This document focuses on how we process your data to administer Workplace Bikes. You should refer to your employer's own policies for details of how your payroll and employment data is processed by them.

Wider Plan acts as sole Data Controller in respect of any personal information relating to business-to-business arrangements, including information relating to personnel who are involved in administering their employer's Workplace Bikes scheme.

4. How we collect information about you

We will collect information from you, your employer and Halfords which we consider necessary in order for us to provide and administer the Workplace Bikes scheme. This includes collecting information which we consider necessary for assessing your eligibility for the scheme and ensuring compliance with HMRC requirements.

We will collect your contact details, date of birth, payroll details and salary sacrifice details. This information will either be provided by you during registration and ongoing contact, or it will be provided to us by or on behalf of your employer.

When you redeem a 'Letter of Collection' in exchange for a cycle and/or accessories, Halfords will keep a record of the items which you have selected.

If your salary sacrifice or hire term is amended, for example due to you being absent from work or leaving your employment, we will keep a record of the amendment and the underlying reason.

If you are involved in the administration of your employer's scheme:

We will collect your contact details and job role. This information will be provided by you or your employer during registration or subsequent account use.

In all cases:

Wider Plan and your employer may also collect any personal information which you provide to them voluntarily, for example by contacting them by email or phone.

Website usage information may be collected using cookies as detailed below.

You may decline to share certain items of personal data with us, in which case we may not be able to provide you with some or all features of the Workplace Bikes service.

5. How we use the information about you

We will only use the information we have collected about you where we have a legal basis for doing so.

If you are a user of Workplace Bikes:

By registering for Workplace Bikes, you are entering into a contract with us. By ordering a 'Letter of Collection', you agree to a variation to your employment contract. Wider Plan and your employer will process your data as we consider necessary to fulfil our respective contractual and statutory obligations.

If you are involved in the administration of your employer's scheme:

We will use your information as we consider necessary to fulfil our contractual obligations with your employer.

We may use your information to market other business-to-business services to your employer in accordance with prevailing legislation. Consent is not required in advance for business-to-business marketing but we will provide clear unsubscribe facilities. Any marketing will be relevant and proportionate.

In all cases:

We will process your data where we have a legitimate interest in doing so, for example to monitor and improve services, to investigate an actual or potential breach of terms and conditions, to facilitate continuity of our services and to protect our respective rights and property or those of other parties.

We will process your data where we have a legal obligation to do so, for example in respect of a fraud investigation or a request from HMRC.

6. How we share your personal information

We will not sell or rent your information to third parties for marketing purposes. Information will only be shared as necessary in respect of the above lawful purposes.

If you are a user of Workplace Bikes:

Wider Plan and Halfords will share information with your employer to enable your employer to assess your eligibility, make the necessary amendments to payroll, maintain appropriate employment records, demonstrate HMRC compliance, maintain an appropriate asset schedule and otherwise fulfil their responsibilities in respect of the administration of your Workplace Bikes order

Wider Plan and Halfords will share information with each other to enable you to receive your selected 'Letter of Collection', to track redemption activity and to provide you with ongoing support.

We may share relevant information with your employer and Halfords in order to improve the accuracy of our respective records and to enable us to provide our services efficiently.

In all cases:

We retain the right to appoint data processors to assist us with any aspect of the provision of Workplace Bikes.

Halfords is appointed as a data processor through a three-way contract with Wider Plan and your employer. Halfords have confirmed that they abide by prevailing data protection legislation and will process Workplace Bikes data only in accordance with instructions from us and your employer.

We will not share any of your personal information with any other third parties without your permission, unless:

- a) We suspect any form of illegal behaviour.
- b) It is necessary by law, regulation or legal proceedings.
- c) It is required to enforce our Terms and Conditions.
- d) We consider it necessary action to protect the property, rights or safety of Wider Plan or any other party.
- e) The third party is acting in a professional capacity, for example as a regulator, auditor or appointed data processor and has suitable confidentiality and privacy measures in place.

7. Marketing and communications

We will not pass your contact details to third parties except as detailed above.

If you are a user of Workplace Bikes:

We will contact you with information relating to your use of Workplace Bikes. This may include for example confirming your order, notifying you of relevant legislative change and advising you if you need to take any action.

Your confirmation of registration and your 'Letter of Collection' email may include added value offers and user benefits which we consider to be part of the Workplace Bikes service. We will not send you any ongoing marketing.

If you are involved in the administration of your employer's scheme:

We will contact you as we consider necessary to facilitate the administration of your Workplace Bikes scheme.

We may use your information to market other business-to-business services to you in accordance with prevailing legislation.

8. Your data protection rights

You can make a request in respect of your data protection rights through any of our usual contact channels.

You have the right to request a copy of any information which we hold about you. This is called a subject access request.

If you wish to receive a copy of your data to assist with your transfer to another service provider, please specify this. We will consider the reasonableness of each request and respond accordingly.

You have the right to have your data rectified in the event it is incorrect or incomplete. Please do contact us in the event of any of your information being inaccurate, as we are committed to maintaining the high quality of our data.

You have a limited right to ask us to restrict processing of your personal data in certain circumstances. We will consider the

reasonableness of each request along with your employer where applicable and will respond accordingly. Your employer has a statutory responsibility to continue with payroll processing, including honouring any salary sacrifice agreement which is in place. It may be necessary for you to return your cycle and accessories to your employer before your request to restrict processing can be implemented.

You have the right to request erasure of your personal data. This is also known as the 'right to be forgotten'. We will anonymise or delete your data in response to this request unless there is an overriding reason for not doing so. For example, as Workplace Bikes is a tax-exempt benefit and often involves an adjustment to salary, we have a statutory duty to retain personal information for six full tax years. Requests to be 'forgotten' will be fulfilled once any overriding reason for delay has ceased to apply.

Copies of your data may also be retained to satisfy legal, regulatory and accounting requirements.

We routinely take backups of data for business continuity purposes. The backups would only be accessed for routine tests or in the event of a failure of our live database. In the event of using this data any previous requests for anonymisation or deletion will be upheld. We will retain a record of requests in order to facilitate this.

You have the right to object to the way in which we are processing your personal data. If you wish to object, you must provide specify which processing you object to, including a reason for your objection.

As Workplace Bikes is administered in association with your employer as Joint Data Controller, we will share your data protection requests with your employer. We will also share your requests with Halfords as we consider necessary to fulfil our obligations.

9. Cookies

Our website uses 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.

We may also use cookies and analytical software to collect anonymous data for internal research purposes and to compile statistical reports on website activity.

Most internet browsers accept cookies by default; however, you can usually change your browser settings to reject cookies. 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.

10. Using other websites

This Privacy Policy only applies to the websites provided by Wider Plan on which it is published.

Our website contains links to websites which are owned or controlled by parties other than Wider Plan or Halfords. These links are provided for your convenience and do not imply that we have reviewed or approved the third-party sites or their policies.

When you access the linked third party websites, you do so at your

own risk. You should check that you agree with each website's Privacy Policy and Terms and Conditions before giving them any of your personal details. We will not be held liable for any misuse of your information or other misconduct by the third party, or any other loss arising from your use of a third party website.

11. Our commitment to data security

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.

If you use a shared computer to access your Workplace Bikes account, we recommend that you always sign out when you have finished.

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.

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

12. Data retention policy

We will retain your personal information for six full tax years following you ceasing to be an active user of Workplace Bikes. We will then delete your personal data within one month.

You will be considered to be an active user of Workplace Bikes from the point of placing an order until such time as you have no ongoing salary sacrifice or hire agreement with your employer in respect of Workplace Bikes.

If you fail to place an order within one year of registering for Workplace Bikes, we will delete your personal data within one month of the end of the following tax year.

Your employer will retain your personal data relating to your membership of Workplace Bikes in line with their own data retention policy. You are advised to request details from your employer if desired.

13. Location of data processing

Workplace Bikes databases are held at data centres within the UK or EEA.

Your employer will also store and process data in respect of your membership of their Workplace Bikes scheme. In some cases, this may lead to your data being transferred or processed outside the UK or EEA. You are advised to request details of the location of data processing from your employer if desired.

Workplace Bikes data may also be saved on storage solutions that have servers outside the UK or EEA, for example within the email systems used by us or your employer. We will only use storage solutions that we consider to provide secure services with appropriate safeguards.

Where we use Data Processors to assist with the administration of Workplace Bikes, we require them to provide us with contractual assurance regarding the location and security of their data processing. Halfords data processing occurs within the UK or EEA.

14. Changes to this Privacy Policy

We may change this Privacy Policy from time to time so please revisit this page at your convenience to ensure that you are aware of any updates. We will bring any substantial changes to your attention by email.

Your continued use of the service will constitute your acceptance of any changes.

15. Further information

Please contact us if you have any questions. We hope that we will be able to resolve any queries or complaints to your satisfaction.

You also have the right to make a complaint about the processing of your personal data to your local Data Protection Authority.