



# Privacy Policy Statement for Earnie

When you use our technology, website, app, portal or services we may collect personal information about you. We are committed to ensuring your privacy and have put together this Privacy Policy, so you know:

- What personal information we collect about you
- How we collect your personal information
- How we use your information
- Who we may share your information with
- Any transfer of personal information outside of the European Economic Area (EEA)
- How long we keep your personal information
- What we do to protect your personal information
- What choices you have about what we can do with your information

## Who are we?

We can be contacted in writing at the address below or on email at [support@myearnie.co.uk](mailto:support@myearnie.co.uk) if you have any comments about this Privacy

We last updated this Privacy Policy on the 29th March 2023.

Ashwoods Lightfoot Limited owns and operates this website. We are a company registered in England and Wales under company number 08287918. Our registered address is Winslade Park, Manor Drive, Chudleigh, Clyst St Mary, Exeter, EX5 1FY.

## What Personal information do we collect about you?

We may collect certain information about you when you use websites within the [myearnie.co.uk](http://myearnie.co.uk) domain, our mobile apps or the Earnie Web Portal. The type of information we collect could be:

- Your name, email address, phone number, and other contact details. Information about your social media accounts such as your username, name, date of birth, and gender if you interact with our social media pages.
- Information about your computer or other device (such as its IP address) and the pages that you visited (see below for more details).
- Payment details such as your credit card information.
- Information about your employment and employer (where your employer provides this service).
- Your photograph (profile picture or a photo we may take if you win one of our competitions).

We collect information about you in two different categories:

- Identifiable information – this is information that allows us to identify you, such as name and email address, telephone number etc.
- Anonymous information – we may collect information that does not personally identify you but categorises you into a group or sector (e.g., age, marital status, lifestyle) and we can use this information to tailor our products and services more accurately.

### When you use the website, mobile apps or the Earnie Portal

We may collect personal information from you when you:

- Give us your contact details, receive further information from us or our newsletter
- Use a "Contact Us" form to leave us questions, queries or feedback
- Contact us via our email addresses
- Sign up to a personal Earnie account and fill in the online form
- Engage with Earnie on social media using your Facebook, Twitter or Instagram accounts
- We may also collect information about your usage of the Earnie app, such as the number of times you log in, which pages you visit, and which services you use.

### When using Earnie

Information you give us directly:

- When you create your Earnie account, we will collect personal information required for this service. The information may include your name, e-mail address and phone number, and other information referred to on the application form.

Information provided by your mobile device (Earnie) allows us to:

- provide a real time KPI for your target that week, and historically,
- provide you with the Earnie Services – which are listed in the Earnie terms and conditions, supplied to you or to your employer,
- check your details if they appear to be incorrect,
- analyse and compare, anonymously, your data and that of other Earnie users to generate anonymised statistical information about users and patterns for the purpose of enhancing the Earnie experience and product for users,
- provide you with rewards and offers that meet your profile,
- and offer competitions, enabling you to compete in leagues with other users and have the opportunity to win prizes.

Information our Website and the Earnie Portal collect automatically

When you visit our website or use our services, we may collect certain information automatically such as:

- the number of times you log in
- which pages you visit
- which services you use
- your IP address, and details of which version of web browser you used
- information on how you use the site, using cookies and page tagging techniques which include those from Hotjar for our portal, Google Analytics for our website, Hubspot for our emails and Facebook.

If you want more information about how we use cookies, you can find out more by reading our Cookies Statement.

## Information we collect from other sources

### **For Users where their service is paid by an employer or other**

We may receive information from your employer, so that we can provide you with your Earnie account invitation and allow you to sign up to our app, the Portal and our associated services.

### **Other Organisations**

We work with a number of other organisations such as payment processing companies, internet search engines, rewards partners, marketing organisations and cookie providers who may provide us with information about you.

- PayPal – [www.paypal.com](http://www.paypal.com) (outgoing payments)
- Facebook – [www.facebook.com](http://www.facebook.com) (they only collect information where you agree via a pop up with them – if you do agree they may provide you with marketing)
- Salesforce - [www.salesforce.com](http://www.salesforce.com) (CRM software, Communications and Customer support)
- Google – [www.google.com](http://www.google.com) (analytics on our website usage)
- GitHub – [www.github.com](http://www.github.com) (Engineering support management)
- Atlassian – [www.atlassian.com](http://www.atlassian.com) (Project management)
- Kumulos – [www.kumulos.com](http://www.kumulos.com) (Mobile Messaging and Mobile Analytics)

## How we use your Personal Information

### **Our legal basis for using your information**

The law only allows us to use your personal information in certain limited circumstances:

We will most commonly process your personal information in the following situations:

- where we need to perform a contract, we have entered into with you or your employer (e.g., to provide you with access to an Earnie account and the accompanying services)
- where you have consented (e.g., you have signed up for a personal account and given us your consent)
- where it is necessary for our legitimate interests, and we have considered your rights and freedoms and have concluded that our processing does not adversely affect these (e.g., where we would like to send you marketing about similar products to those which you have purchased from us or have expressed an interest in)
- Where we need to comply with a legal obligation (e.g., to comply with tax laws).

### **What does this mean in practice?**

- Provide you with your Earnie account and its associated services. Fulfil any contracts we have entered into with you or your employer.
- Provide information about behaviour to your employer if your Earnie access and/or subscription was supplied through your employer.
- Provide third party services that you requested from us or are included in the Earnie services.

- If you agree, to enter you into competitions to win prizes. Analyse our services and tailor them to future needs.
- Prevent and detect fraud.
- Administer our website and mobile apps (such as troubleshooting, data analysis and research).
- Help us implement measures to keep our website and mobile apps safe and secure.

## Our Marketing

We will send you our newsletter and other offers if you sign up for an account via the web portal or Earnie app. Or you have signed up for receiving such offers as our Newsletter on our website.

If you are a registered user of Earnie, we may send you information with our special offers and will offer you the chance to sign up to receiving offers from third parties about related products.

We may use your information for market research and analysis so that we can ensure that we tailor our services to the requirements of our users.

Depending on what contact information you have given to us, we may contact you by email, mobile push notification, SMS/MMS message, or social media.

We will only do this where you have consented to receiving such information from us. You can opt out of such marketing at any time via the app or web portal account settings or by email to us at support@myearnie.co.uk

## Sharing your data

### Employer or other Earnie bill payer

If you are a user where your Earnie access is provided by a third party such as an employer, we will share information about you with the third party per their agreement. The type of information will depend on the services that your employer subscribes to and you will be informed of what information is shared by your employer. Your employer is the data controller for this information and further information about how they use your information can be obtained from them..

### Other third parties

We have explained above that we may share your personal data with third parties in order to provide the Earnie services. If you wish to take advantage of our offers with third parties then you will be asked for your consent before, we transfer you to any other organisation's website.

We may also share your information with:

- Our business partners, suppliers, and sub-contractors for the performance of any contract we enter into with them, or you, or your employer.
- Our website, portal and mobile app providers who need to see your information in order to keep our services functioning.
- Analytics and search engine providers who analyse information about your use of our website and help us to tailor the product and offers that we offer to you and other users.

We work with the following organisations:

- Salesforce (www.salesforce.com), our CRM system which manages weekly newsletters with our customers. It also provides analytics as to how you interact with us.

- Amazon Web Services (aws.amazon.com), our cloud services partner which securely stores information from our Earnie devices.
- PayPal (www.PayPal.com), our payment processor.
- Kumulos (www.kumulos.com) who provides mobile messaging.

## Legal Requirements and Law Enforcement

We may also disclose your information if:

- We sell our business in which case the personal information that we hold will be part of the transferred assets.
- We are required by law, or in order to enforce or apply our terms of use. This includes exchanging information with other organisations for the purposes of fraud protection and credit risk reduction.

## Third Party Privacy Policies

This Privacy Policy applies only to Earnie systems, and not to websites or content owned by third parties. We may provide links to other websites and content, and we suggest that you check the policies of these sites before giving them your personal information as we cannot accept responsibility.

## Keeping your Personal Information

### Where we store your Personal Information

We are committed to ensuring that both we and our suppliers have appropriate technical, administrative and physical procedures in place to ensure that your information is protected against loss or misuse.

We require all our suppliers who handle your personal information to have appropriate technical, administrative and physical procedures in place to ensure that your information is protected against loss or misuse. We work closely with our suppliers to make sure that this requirement is met.

If a supplier is outside of the EEA, we will ensure that they have entered into a data transfer agreement that is consistent with the requirements of applicable law and that gives the individuals enforceable rights and effective legal remedies and provides adequate levels of protection in relation to any Personal Data that is transferred.

Any card payment transactions enacted by or on behalf of Earnie (which is a product of Ashwoods Lightfoot Ltd) will be encrypted. 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.

### Emails

We have procedures and security features in place to try and keep your data secure once we receive it. If you choose to send us information via email, we cannot guarantee the security of this information until it is delivered to us.

## Retention of Information

We only hold your personal information for as long as necessary for the purposes for which we collected your information.

We outline below how long we retain information for and how it is deleted:

Description of data	Retention Period	Reason for Retention Period	Method of Disposal
Contact details	Statutory or 1 year after contract end.	Contract fulfilment	Delete or anonymise data.
Demographic details	1 year after contract end.	Provision of Earnie services + deletion time	Delete or anonymise data.
Payment details	Statutory or 1 year after contract end	Contract fulfilment	Delete or anonymise data files.
Transaction history	Statutory limits	Statutory requirement	Delete or anonymise data files.
Photographs	1 year after contract end for product system. As agreed with the subject for any marketing.	Provision of Earnie services + deletion time. Promotion of goods and services.	Delete data files.
Employment information	6 years after contract end.	Provision of Earnie services + deletion time	Delete or anonymise data files.
Photographs	1 year after contract end for product system. As agreed with the subject for any marketing.	Provision of Earnie services + deletion time. Promotion of goods and services	Delete data files.
Online browsing history and statistics	3 years	Provision of Earnie services + deletion time	Delete or anonymise data files.
User KPI information	1 year after contract end.	Provision of Earnie services + deletion time	Delete or anonymise data files.
CRM based marketing database	3 years after the last enquiry has been received or within 7 days of a request to unsubscribe.	Provision of information on Earnie news, product and services	Delete from CRM system.

We have set these timescales in accordance with any applicable legislation and where none exists then we will keep your information for the duration of any contract that you have entered into with us and then for a period of 7 years after which time it will be deleted.

Where you have requested marketing information from us, then we will only keep this information for a maximum of up to 3 years. If you do not contact us further during this period, then your information will be deleted.

## Your Rights

### Access to information

You have the right to access information that we hold about you. If you wish to receive a copy of the information that we hold, please contact [support@myearnie.co.uk](mailto:support@myearnie.co.uk) or write to us at the address above.

## Changing or deleting your information

You can ask us at any time to change, amend or delete the information that we hold about you or ask us not to contact you with any further marketing information. You can also ask us to restrict the information that we process about you.

You can request that we change, amend, delete your information or restrict our processing by using the check boxes on the forms we use to collect your information, emailing us at [support@myearnie.co.uk](mailto:support@myearnie.co.uk), or writing to us at the address at the beginning of this Privacy Policy.

## Right to prevent automated decision making

You have a right to ask us to stop any automated decision making. If you would like to request, we stop, or you have any questions or concerns we would be happy to discuss them with you and you can contact us at [support@myearnie.co.uk](mailto:support@myearnie.co.uk).

## Transferring Personal Information

You have the right to request that your personal data is transferred by us to another organisation (this is called "data portability"). Please contact us at [support@myearnie.co.uk](mailto:support@myearnie.co.uk) with the details of what you would like us to do, and we will try our best to comply with your request. It may not be technically feasible, but we will work with you to try and find a solution.

## Complaints

If you make a request to us under this Privacy Policy and you are unhappy with the response, you can ask for the request to be reviewed under our internal complaints procedure. Our internal complaints procedure allows your request to be reviewed by our ISMS team lead who will do their best to try and resolve the issue.

If you have been through the internal complaints procedure and are still not happy with the result, then you have the right to complain to the Information Commissioner's Office. They can be contacted as follows:

Address:

Information Commissioners Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Website: [www.ico.org.uk](http://www.ico.org.uk)

Telephone: 0303 1231113

If you are an international resident, you may wish to complain to the relevant country's ICO.

## Changes to our Privacy Policy

The internet and data privacy best practice are both developing. We therefore reserve the right to revise this Privacy Policy at any time. If this Privacy Policy changes in any way, we will place an updated version on this page. Regularly reviewing this page ensures you are always aware of what information we collect, how we use it and under what circumstances, if any, we will share it with other parties.



## How to contact us

Questions, comments, and requests regarding this Privacy Policy are welcomed and should be addressed to [info@lightfoot.co.uk](mailto:info@lightfoot.co.uk).