

WORKER FEEDBACK CLUB
PRIVACY AND COOKIE NOTICE

Last updated: May 2022

1. INTRODUCTION	
Who are we?	<p>Subtap Limited ("Worker Feedback Club", "we", "us", and "our") is a company incorporated in the United Kingdom with company number 10912570 and registered address at 2 Western Street, Barnsley, South Yorkshire, S70 2BP.</p> <p>Where we decide the means or purpose of processing personal data, we are the "controller".</p>
What's this notice about?	<p>This notice covers processing activities relating to individuals who use the following (each a "User"):</p> <ul style="list-style-type: none"> • our "Worker Feedback Club" application, which facilitates workforce engagement on construction projects (the "App"); • our website: https://workerfeedbackclub.com/ (the "Website"); and • any services which relate to the Website or App, (together, the "Worker Feedback Club Platform"). <p>We update this notice from time to time so please check back in on a regular basis.</p>
What rights do Users have?	<p>Users have certain rights, although these rights may be limited in some circumstances. Users can:</p> <ul style="list-style-type: none"> • Ask us to send them a copy of their personal data to them or someone else • Ask us to restrict, stop processing, or delete their personal data • Object to our processing of their personal data • Object to the use of their personal data for direct marketing purposes • Ask us to correct inaccuracies in their personal data <p>If we rely on consent to process data, or send direct marketing, they can withdraw consent by email to the email address below.</p>
How can Users contact us if they have any questions about this notice or about their data subject rights?	<p>Email us at: hello@workerfeedbackclub.com</p> <p>If we can't resolve an issue, Users can also get in touch with the Information Commissioner's Office: https://ico.org.uk/concerns (or if a User lives in a European country other than the UK, they can submit a complaint to the supervisory authority in their country).</p>

2. HOW WE USE PERSONAL DATA

Personal data	How we use it	Sources and recipients
<p><u>Enquiry Data</u></p> <p>We collect the following categories of personal data in relation to Users to respond to enquiries relating to the Worker Feedback Club Platform:</p> <ul style="list-style-type: none"> • name; • email address; and • other personal data sent as part of enquiries. 	<p><u>Legal basis</u></p> <p>We process this personal data using the following legal basis:</p> <ul style="list-style-type: none"> • in accordance with the terms of our contract with Users (being the User Terms and Conditions which can be accessed here); and • to pursue our legitimate interests of understanding how Users use the Worker Feedback Club Platform and of improving our Worker Feedback Club Platform. 	<p><u>Sources</u></p> <p>We collect this information directly from the User.</p> <p><u>Recipients</u></p> <p>We share Enquiry Data with:</p> <ul style="list-style-type: none"> • Google for the purpose of receiving email services to communicate with users; • AWS for the purpose of receiving web hosting services; • Sendinblue for the purpose of receiving email marketing services; • Mixpanel for the purpose of receiving analytics services (including tracking user activity on the Worker Feedback Club Platform); and • Sentry for the purpose of receiving application monitoring and error tracking services.

<p><u>Marketing Data</u></p> <p>We collect the following categories of personal data in relation to Users for the purpose of sending them our newsletter and letting them know about news and updates relating to us, the Worker Feedback Club Platform, our other partners and related services, and administering our social media pages:</p> <ul style="list-style-type: none"> • name; • email address; and • marketing preferences. 	<p><u>Legal basis</u></p> <p>We process this personal data using the legal basis of the User's consent, or to pursue our legitimate interest of promoting the success of our business.</p> <p><u>More Information</u></p> <p>Users can withdraw their consent at any time by dropping us a line or clicking on the unsubscribe link in our emails.</p>	<p><u>Sources</u></p> <p>We collect this information directly from the relevant User.</p> <p><u>Recipients</u></p> <p>We share Enquiry Data with:</p> <ul style="list-style-type: none"> • Google for the purpose of receiving email services to communicate with users; • AWS for the purpose of receiving web hosting services; and • Sendinblue for the purpose of receiving email marketing services.
<p><u>Analytics Data</u></p> <p>We collect the following categories of personal data in relation to Users to analyse how the Worker Feedback Club Platform is functioning and how it is used by Users, for insight purposes and to help us maintain and improve the Worker Feedback Club Platform on an ongoing basis:</p> <ul style="list-style-type: none"> • the Internet protocol (IP) address used to connect a User's computer or device to the internet; • browser type and version; • time zone setting; • browser plug-in types and versions; and • operating system and platform. 	<p><u>Legal basis</u></p> <p>We process this personal data using the legal basis of the User's consent.</p>	<p><u>Sources</u></p> <p>We collect this information directly from the relevant User.</p> <p><u>Recipients</u></p> <p>We share Enquiry Data with:</p> <ul style="list-style-type: none"> • Google for the purpose of receiving analytics services to monitor usage of our website; and • Mixpanel for the purpose of receiving analytics services (including tracking user activity on the Worker Feedback Club Platform).

3. COOKIES, ANALYTICS AND SIMILAR TECHNOLOGIES

Cookies, pixels and other technologies store and access data on devices to help websites and apps work. This table explains their purpose, how long they last, and who else can access their data. We get consent to use them unless they're essential to the Worker Feedback Club Platform.

Most browsers allow control over cookies, for more information: [Google Chrome](#) | [Microsoft Edge](#) | [Mozilla Firefox](#) | [Microsoft Internet Explorer](#) | [Opera](#) | [Apple Safari](#).

Cookie/data	Duration	Purpose	Access
Google Analytics	2 years	To track Users' behaviour on the Worker Feedback Club Platform and improve the Worker Feedback Club Platform's performance.	Users can access their privacy policy here .
Mixpanel	1 year	To track Users' behaviour on the Worker Feedback Club Platform and improve the Worker Feedback Club Platform's performance.	Users can access their privacy policy here .
Sentry	Up to 2 years	To monitor performance and track bugs in our software.	Users can access their privacy policy here .
Sendinblue (email pixel)	Persistent	To track User engagement on our email campaigns	Users can access their privacy policy here .

4. DATA RETENTION, TRANSFERS AND DISCLOSURE

How long do we keep personal data?	We generally hold personal data for five years following our last interaction, engagement or correspondence with each User. At the end of the retention period, we assess whether it is necessary to continue to retain information to achieve the purposes for which it was collected (taking into account the amount, nature, and sensitivity of the personal data, the potential risk of unauthorised access, and legal requirements).
Transfers	The personal data described in this notice is generally stored in the UK and European Economic Area (" EEA "). Where we use data processors outside the UK and EEA, and transfer personal data to a country which the Information Commissioner's Office in the UK (the " ICO ") and the European Commission does not provide an adequate level of protection, we use contracts approved by the ICO and the European Commission which give personal data protection similar to that which it has in the UK

	and the EEA (as applicable). For more information drop us a line using the contact details at the start of this notice.
Disclosure	<p>Other than as set out above, we may disclose personal data described in this notice:</p> <ul style="list-style-type: none">• Where required by law, government, competent authorities or the courts or to establish, exercise or defend our legal rights, and for the purposes of preventing crime and fraud (for example, we may share personal data with our professional advisors, investigators, or credit reference agencies).• With suppliers and subcontractors, as necessary for the purposes set out in this notice.• If involved in an investment, merger, acquisition, or sale of our organisation or assets, personal data we hold may be shared on the basis of the legitimate interests of us, our shareholders, customers and other parties to a transaction, unless those interests are outweighed by prejudicial impacts upon the User.