

PRIVACY POLICY

This privacy policy sets out how Bravo Benefits uses and protects any information that you give when you use our websites bravobenefits.co.uk or <https://bravologin.co.uk> (including any subdomains), Smart Hive app and our services.

We are committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified; you can be assured that it will only be used in accordance with this privacy statement.

1. WHAT WE COLLECT

When you visit our website, online platform or app you may be asked to provide us with information as follows:-

- Personal Information which you are required to provide to us on an individual basis when you register to use our products or services
- Information you provide to us about your business and your position within the business when you make an enquiry about our services
- Website use information collected as you and others browse our website

1.1. PLATFORM AND APP

The information we collect during the registration process through our platform or app is product specific. We will never ask for any information that is not required to fulfil the product or service you or your employer on your behalf has selected or where you are a childcare provider, you have been nominated to provide by a parent who wishes to pay you with childcare vouchers.

1.1.1. WHERE YOUR DATA IS STORED

All data is held in the UK. Only approved individuals can access the site.

Your data can only be viewed by our staff.

By submitting your personal data, you agree to this.

1.1.2. REFUSAL TO GIVE INFORMATION

For all products/services, refusal to give information during the registration process will result in the user being unable to complete their application.

1.2. WEBSITE AND APP SECURITY

Any information you submit over the internet is sent at your own risk.

We have strict procedures and security features in place to keep your data secure once we receive it.

Similar to other commercial websites and apps, our website/app uses a technology called "cookies" (see explanation below, "What Are Cookies?") and web server logs to collect information about how our website or app is used.

Information gathered through cookies and web server logs may include the date and time of visits, the pages viewed, time spent at our website or app, and the websites visited just before and just after our website.

1.2.1. WHAT ARE COOKIES?

A cookie is a very small text document, which often includes an anonymous unique identifier. When you visit a website or app, that site's web server/computer asks your computer for permission to store this file in a part of your hard drive specifically designated for cookies.

Each website/app can send its own cookie to your browser if your browser's preferences allow it, but (to protect your privacy) your browser only permits a website/app to access the cookies it has already sent to you, not the cookies sent to you by other sites, therefore private information supplied to one website/app cannot be read by another organisation.

1.2.2. HOW DO WE USE INFORMATION WE COLLECT FROM COOKIES?

As you browse and navigate around our website or app, cookies are used to differentiate you from other users to prevent you from seeing unnecessary advertisements or requiring you to log in more than is necessary for security.

Cookies, in conjunction with our web server's log files, allow us to calculate the aggregate number of people visiting our website/app and which parts of the website are most popular. This helps us gather feedback so that we can improve our website/app and better serve our customers.

Cookies do not allow us to gather any personal information about you and we do not generally store any personal information that you provided to us in your cookies.

2. WHAT WE DO WITH THE INFORMATION WE GATHER

We require this information to understand your needs and provide you with a better service, and in particular for the following reasons:

- Internal record keeping.
- In accordance with your authorisation at the point of registration.
- To adhere to HMRC guidelines.
- We may use the information to improve our products and services.
- To notify you about changes to our service.
- Call recording and monitoring telephone calls to allow continuous improvement and for training purposes.

3. DATA SECURITY

We will protect the data that you entrust to us via appropriate security measures and controls. Please see related policy Data Protection and System Security for further information.

4. LINKS TO OTHER WEBSITES

Our website, platform and app may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

5. CONTROLLING YOUR PERSONAL INFORMATION

We won't share your information with any other organisations for marketing, market research or commercial purposes, and we don't pass on your details to other websites.

The only exception will be where we are obliged by law, for purposes of national security, taxation and criminal investigations.

If you have previously agreed to us using your personal information for direct marketing purposes in relation to Bravo Benefits products and services, you may change your mind at any time by unsubscribing directly within any communication received, writing or emailing us.

5.1. YOUR RIGHTS

- a) **Right to be informed:** We will always be transparent in the way we use your personal data. You will be fully informed about the processing through relevant privacy notices.
- b) **Right to access:** You have a right to request access to the personal data that we hold about you. The information is provided free of charge and we will reply within 1 month. If you would like to request a copy of your personal data, please contact us at the address at the foot of this policy
- c) **Right to rectification:** We want to make sure that the personal data we hold about you is accurate and up to date. If any of your details are incorrect, please let us know and we will amend them.
- d) **Right to erasure:** You have the right to have your data 'erased' in the following situations:
 - Where the personal data is no longer necessary in relation to the purpose for which it was originally collected or processed.
 - When you withdraw consent.
 - When you object to the processing and there is no overriding legitimate interest for continuing the processing.
 - When the personal data was unlawfully processed.
 - When the personal data has to be erased in order to comply with a legal obligation.
 - If you would like to request erasure of your personal data, please contact us via the address at the foot of this policy. Please note that each request will be

reviewed on a case by case basis and where we have a lawful reason to retain the data, it may not be erased.

- e) **Right to restrict processing:** You have the right to restrict processing in certain situations such as:
- Where you contest the accuracy of your personal data, we will restrict the processing until you have verified the accuracy of your personal data.
 - Where you have objected to processing and we are considering whether our legitimate grounds override your legitimate grounds.
 - When processing is unlawful and you oppose erasure and request restriction instead.
 - Where we no longer need the personal data but you require the data to establish, exercise or defend a legal claim.
- f) **Right to data portability:** You have the right to data portability in certain situations. You have the right to obtain and reuse your personal data for your own purposes via a machine-readable format, such as a .CSV file. If you would like to request portability of your personal data, please contact us via point at the address at the foot of this policy, this only applies:
- To personal data that you have provided to us;
 - Where the processing is based on your consent or for the performance of a contract; and
 - When processing is carried out by automated means.
- g) **Right to object:** You have the right to object to the processing of your in the following circumstances:
- Direct marketing (including profiling). Remember you can opt out at any time from marketing communications Where the processing is based on legitimate interests;
 - Processing for purposes of scientific/historical research and statistics.
- h) **Rights in relation to automated decisions making including profiling:** You have the right to not be subject to a decision when it is based on automated processing. If you have any questions in relation to how your information is processed in this way, then please contact us at the address at the foot of this policy

5.2. DATA QUALITY

We recognise the importance of data quality and will develop and maintain up to date information.

In order to be confident in the data that both Bravo Benefits holds and our customers provide us with, we need to be assured that the data we hold is:

- Accurate (in terms of correctness)
- Comprehensive (all relevant data has been captured)
- Valid (in a format which conforms to recognised council and national standards)
- Timely (available when needed and up to date)
- Stored securely and confidentially (where appropriate)
- Maintained (e.g. data retention procedures)
- Minimised (we only capture the specific data required to fulfil the product or service)

6. RETENTION OF DATA

If you are an employer, we will ensure that all data relating to the employer account only will be anonymised in our platform 7 years after you request your account to be closed. This does not include data relating to employee's accounts. This will include any backups of data and cannot be reversed.

If you are an employee who has used our Childcare Voucher scheme, we will ensure that your data will be anonymised in our platform 7 years after you request your account to be closed. This will include any backups of data and cannot be reversed.

If you are an employee who has never used our Childcare Voucher scheme, your data will be anonymised in our platform immediately after you request your account to be closed. After 1 month this will also include any backups of data and cannot be reversed.

7. STATUTORY INFORMATION ABOUT BRAVO BENEFITS

Bravo Benefits is registered in England and Wales.

Registered Company Number: 06758298

ICO Registration Number: Z2411286

Registered Office:

Bravo Benefits Ltd

Office 4

Swan Park Business Centre

Kettlebrook Road

Tamworth

Staffordshire

B77 1AG

Telephone: 0330 333 9100