

# Wellevation Workplace Solutions Ltd. Privacy Policy

#### 1. Introduction

Wellevation Workplace Solutions Ltd ("we,", "us," or "our) is committed to protecting your privacy when you use our services in compliance with the General Data Protection Regulations (UK GDPR), the Data Protection Act 2018, and other applicable laws. This policy explains:

- What data we collect
- How we use and protect it
- Your rights regarding your data

Please read this Privacy Policy carefully. We may update this policy periodically. The latest version will always be available at: <a href="https://www.wellevationws.com">www.wellevationws.com</a>.

Contact us: For questions, about this policy, please email hello@wellevationws.com.

**ICO Registration:** We are registered as a Data Controller with the Information Commissioner's Office (ICO), registration number **C1728947**. View our public register entry here: <a href="https://ico.org.uk/ESDWebPages/Entry/ZB943289">https://ico.org.uk/ESDWebPages/Entry/ZB943289</a>.

# 2. About Us

Wellevation Workplace Solutions Ltd is a workplace wellbeing consultancy registered in England and Wales (Company No. 15782754).

Registered Office: The Offices, The Horsepond Courtyard, Castle Cary, Somerset, BA7 7BD.

**Services:** We provide Psychosocial Risk Assessments. This is a systematic process to identify and evaluate factors in the work design, organisation, and management that could pose a risk to employees' psychological health and well-being, such as high work demands. Assessments include but are not limited to:

- 1. Planning the assessment process steps and reviewing existing data
- 2. Data collection using different methods such as surveys, interviews and focus groups
- 3. Analysing raw data to produce meaningful results
- 4. Using collected data to produce reports with actionable recommendations

Our approach is evidence-based, flexible, and action-oriented.

- 3. Data We Collect
- A. Personal Data

# What we collect:

• Contact details: Names, job titles, work emails/phone numbers, workplace site addresses (for clients and participants)



- Special category data: Mental health or stress disclosures (processed only with explicit consent)
- Survey/interview/focus group responses: Where attributable to individuals

#### How we use it:

- To deliver employer-level consultancy services
- For contractual/legal compliance
- With consent, for attributed feedback in reports

### **Anonymity Measures:**

Wherever possible, we implement strict protocols to pseudonymise data (using a different name). Some information needs to remain directly identifiable to enable consultancy services to be provided, for example, the email address and phone number of the key contact at an organisation. Our measures to protect anonymity include:

- Removing direct identifiers (names of people, unique job titles)
- Using generic role descriptors (e.g., estate agent). Please note, participant employees will be consulted about how they will be referred to in reports
- Aggregating responses in reports (e.g., 60% of dentists reported high work demands)

#### Limitations:

Complete anonymity cannot be guaranteed if:

- Organisational size or structure makes identification possible (through small teams or unique roles)
- Demographics or details referred to by the participant enables identification

We will advise participants against including personally identifiable information in responses. We will also inform participants of their ability to request exclusion of specific responses during data review.

### Retention:

Personal data (non-anonymised data) will be retained only as necessary for us to deliver the contracted services and thereafter for seven years to comply with legal obligations and professional indemnity insurance. Where no legal or insurance retention requirement applies, we will delete personal data immediately upon request or anonymise it. You may still request for anonymised data to be deleted (please see below).

Special category data will be deleted earlier where possible, unless retention is justified under UK GDPR Article 9(2).

# **B.** Organisational Data

# What we collect:



- Anonymised survey results and statistical analysis (e.g., "60% of employees report high stress)
- Anonymised business process insights (e.g., workflow patterns, policy gaps)

#### How we use it:

- · For research, service improvement or industry benchmarking
  - For your organisation (e.g., comparison of stress levels across departments)
  - To enable us to advise other organisations
- To generate anonymised reports and recommendations

#### **Retention:**

Indefinitely for as long as we can learn from it. This data will be reviewed annually to ensure that it remains relevant and useful. If you would prefer any non-personally identifiable information collected from your business to be deleted, please request this.

# **Anonymity Measures:**

When processing information about your organisation beyond the purposes of our consultancy services with you, we will implement strict anonymisation protocols to minimise the chance that processed data identifies your business. Specifically:

- Removal of direct identifiers (company name, client codes, unique department titles)
- Threshold suppression (withholding results where small samples or niche sectors could enable identification).

# 4. How We Collect Data

# We collect data in the following ways:

- Enquiries submitted by you through our website or by email
- Communications with you via telephone, video call or in-person meetings as part of the consultancy service provided
- Interviews, focus groups and surveys

# **Legal Bases for Processing**

We only process your data where we have a valid legal basis. Under the UK GDPR and Data Protection Act 2018, this is:

- Contractual Necessity this applies to organisational data needed to fulfil our contract with you and deliver our services (Article 6(1)(b))
- **Legal and Compliance** this applies to data collected for accounting (HMRC), insurance and statutory record-keeping (Article 6(1)(c))
- **Legitimate interest** this applies to anonymised survey results and anonymised business process insights. This data enables us to improve our services (Article 6(1)(f))



 Explicit Consent – this applies to special category data (mental health disclosures, stress experience) and any personally identifiable survey/focus group/interview responses (Article 9(2)(a))

We will ask you whether you would like to hear about our services in the future. This is an optional purpose; you can decline this and opt-out anytime.

# 5. Data Sharing & Security

# **Sharing**

Your personal data will be treated confidentially and will not be shared with third parties unless:

- **Legally required** (e.g., where sharing would be in the public interest to protect public safety)
- There is a safeguarding concern
- You consent (e.g., for case studies)

If we are legally required to share our data or there is a safeguarding concern, wherever possible, we will discuss our concern with you and explain the action we need to take.

We will never sell your personal data.

Non-personally identifiable information provided for consultancy services may be shared to facilitate supervision for individuals carrying out services for Wellevation Workplace Solutions Ltd.

As referred to already in Section 3(B) Organisational Data and under Section 4 Legitimate Interest, parts of anonymised survey results and anonymised business process insights may be shared with other clients to enable shared learning and benchmarking. If you would prefer any non-personally identifiable information collected from your business not to be shared beyond Wellevation Workplace Solutions Ltd., please request this.

### **Security Measures:**

We will take precautions to ensure the information you provide remains secure. Examples of our security measures include:

- Personal information will be stored on a password-protected encrypted device wherever reasonably possible.
- Digital documentation (instead of paper documentation) will be used wherever reasonably possible.
- Anonymisation and pseudonymisation will be used wherever reasonably possible.
- Data access will be limited to authorised personnel.
- All telephone, video call and in-person communications we organise will, if at all possible, take place in a private room with a closed door.

If you would like us to take any additional precautions, please contact us.



### 6. Your Rights

Under data protection law, you have the right to:

- Access your data you can ask us for copies of your personal data that we are processing. Linked to this is your right to data portability, enabling you to take that data and give it to another organisation if you wish.
- Rectify your data you have the right to ask us to correct any inaccurate data we hold about you.
- Request your data to be erased you have the right to ask us to erase your personal
  information in certain circumstances.
- **Restrict the processing of your data** you have the right to request that Wellevation Workplace Solutions Ltd refrain from processing your data in certain ways.
- Object to marketing or data usage you have the right to object to us using your data for certain purposes. For example, using your information to contact you about our future services is optional; you could decline this so that you are never contacted or opt out at any time.

To exercise these rights, contact <u>laura@wellevationws.com</u>. You are not required to pay any charge for exercising your rights and we respond within one month.

#### 7. Concerns

If you have any concerns, would like more information or would like to make a request about your data, please contact us at: <a href="mailto:laura@wellevationws.com">laura@wellevationws.com</a>. Address your email to Laura Rossiter and clearly outline your case.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

If you are unhappy with how we have handled your data, you may complain to the ICO (www.ico.org.uk).

Their address is: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF.

Their helpline number is: 0303 123 1113

Policy Owner: Laura Rossiter

**Created:** 10/10/25

Last Reviewed: 10/10/25