Etho Privacy Policy

Etho ("We") are committed to protecting and respecting your privacy. This policy (together with our Terms of Service and licence agreement for the use of Etho) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By using the Etho platform you are accepting and consenting to the practices described in this policy.

Categories of Personal Data

Identity Data
First and last name, email address, date of birth, location, department/team, postal address, workplace address, workplace roles and profession.

Marketing and Communications Data
Your preferences in receiving marketing and other communications from us.

Technical Data
This includes Internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, device ID, usage data, operating system and platform and other technology on the devices you use to access our services. Technical data also includes intelligence experience information such as recording what links you click on and how often you visit certain pages.

User-Generated Data
Information and content that you submit to our platform such as physical and emotional wellbeing scores, responses to user prompts and any free text entered.

Aggregated Data
Aggregated data is information that collected from multiple sources and individuals in an anonymous format which allows the preparation of data summaries or summary reports. While Aggregated Data does not constitute Personal Data as it does not directly or indirectly reveal your identity, it is our policy to ask your permission to collect this data.

Special Category Data
This includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership. Use of our services is not dependant on the provision of this data, but some functionality may be reduced if it is not provided. Where we ask for this data we will make clear the reason for the request.

Your Personal Data is processed by Etho for the following purposes and using the following services:

1. **Analytics:** To allow us to track usage of our services
    1.1. Google Analytics
        1.1.1. Personal Data: Cookies; Usage Data
2. **Backup saving and management:** To ensure continuity of service and prevent loss of data
    2.1. AWS Backup
        2.1.1. Personal Data: Identity Data, Technical Data, User-Generated Data, Aggregated Data, Special Category Data, various types of Data as specified in the privacy policy of the service
3. **Cookie Consent:** As required by law to track cookie consent on our website

3.1. CookieYes Consent Solution

3.1.1. Personal Data: Cookies: Usage data; Data communicated while using the service

4. **Hosting and backend infrastructure:** The servers where our platform is hosted

4.1. Amazon Web Services (AWS): App hosting

4.1.1. Personal Data: Identity Data, Technical Data, User-Generated Data, Aggregated Data, Special Category Data, various types of Data as specified in the privacy policy of the service

4.2. Webflow: Website hosting

4.2.1. Personal Data: various types of Data as specified in the privacy policy of the service

5. **Infrastructure monitoring:** Maintaining our service continuity

5.1. AWS CloudWatch Performance Monitoring

5.2. Personal Data: various types of Data as specified in the privacy policy of the service

6. **Location-based interactions:** To allow us to provide push notifications and enhance your user experience.

6.1. Amazon Location Service

6.1.1. Personal Data: geographic position; Geolocation and Non-continuous geolocation

7. **Managing contacts and sending messages**

7.1. Freshsales

7.1.1. Personal Data: address; city; company name; Cookies; country; date of birth; email address; first name; gender; language; last name; phone number; profession; profile picture; state; Usage Data; username, Marketing & Communications data.

7.2. Microsoft 365

7.2.1. Personal Data: address; city; company name; Cookies; country; date of birth; email address; first name; gender; language; last name; password; phone number; profession; profile picture; state; Usage Data; username, Marketing & Communications data

7.3. Webflow Contact form

7.3.1. Personal Data: first and last name; profession; email address

7.4. Integration of Freshsales with Freshchat and/or Freshdesk

7.4.1. Freshchat Widget live chat

7.4.2. Personal Data: Data communicated while using the service; email address; Tracker; Usage Data

8. **Managing data collection and online surveys:** Data collected during induction and training to allow us to personalise our service.

8.1. Typeform

8.1.1. Personal Data: address; company name; Cookies; country; Data communicated while using the service; date of birth; email address; first name; gender; geographic position; last name; phone number; profession; Usage Data; username; various types of Data as specified in the privacy policy of the service

8.2. Microsoft 365

8.2.1. Personal Data: address; company name; Cookies; country; Data communicated while using the service; date of birth; email address; first name; gender; geographic position; last name; phone number; profession; Usage Data; username; various types of Data as specified in the privacy policy of the service

9. **Managing support and contact requests**

9.1. Freshdesk

9.1.1. Personal Data: Data communicated while using the service; various types of Data as specified in the privacy policy of the service

10. **Operations:** Data collected to allow us to provide an effective service

     10.1.Clickup
        10.1.1.   Personal Data: company name; Data communicated while using the service; email address; first name; gender; last name; phone number; profession; Roles at company, Usage Data; username; various types of Data as specified in the privacy policy of the service
     10.2.Microsoft 365

11. **Registration and authentication:** To register you as a new user via use of a mobile phone number or email address. To allow sign into the app.
     11.1.AWS Identity and Access Management (IAM)
     11.2.Personal Data: email address; first name; last name; password; phone number; profile picture; username

12. **SPAM protection**
     12.1.Google reCAPTCHA
        12.1.1.   Personal Data: Cookies; Usage Data

13. **Service and Support:** Provide you with the services offered on our Site (including technical support services)
     13.1.Freshdesk
        13.1.1.   Personal Data: email address; first name; last name; password; phone number; profile picture; username
     13.2.Clickup: Personal Data: Data communicated while using the service; various types of Data as specified in the privacy policy of the service

14. **User database management**
     14.1.Freshsales CRM
        14.1.1.   Personal Data: address; city; company name; Cookies; country; date of birth; email address; first name; gender; Invoicing information; language; last name; password; phone number; profession; profile picture; number of employees; Usage Data; username; various types of Data as specified in the privacy policy of the service

Further information about the processing of Personal Data

15. **Analysis and predictions based on the User's Data:** The Owner may use the Personal and Usage Data collected through this Application to create or update User profiles. This type of Data processing allows the Owner to evaluate User choices, preferences and behaviour for the purposes outlined in the respective section of this document.

16. **Provision of services to regional and national NHS and social care bodies:** We provide data in an anonymised format to help understand workforce trends, mobility, and morale. This Aggregated Data does not constitute Personal Data as it will not be possible to identify you. We will ask for your consent to collect this data. While every effort is made to ensure users cannot be identified from this Data, we cannot guarantee anonymity.

17. **Push notifications**
     17.1. This Application may send push notifications to the User to achieve the purposes outlined in this privacy policy.
     17.2. Users may in most cases opt-out of receiving push notifications by visiting their device settings, such as the notification settings for mobile phones, and then change those settings for this Application, some or all of the apps on the particular device.
     17.3. Users must be aware that disabling push notifications may negatively affect the utility of this Application.

18. **Push notifications based on the User's geographic location**

18.1. This Application may use the User's geographic location to send push notifications for the purposes outlined in this privacy policy.

18.2. Users may in most cases opt-out of receiving push notifications by visiting their device settings, such as the notification settings for mobile phones, and then changing those settings for some or all of the apps on the particular device.

18.3. Users must be aware that disabling location services may negatively affect the utility of this Application.

19. Third Party Links

19.1. The Etho app may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share your Personal Data. We do not control these third-party websites and are not responsible for their privacy statements.

20. Data security, integrity, and retention of your information

20.1. We will retain your personal information for the length of time needed to fulfil the purposes outlined in this privacy policy unless a longer retention period is required or permitted by law. If you ask us to delete your account, we will delete your contact and ID information within 60 days of your request.

20.2. Our Data is stored in an Encrypted Database which disassociates Personal Data from User-Generated Data to increase security.

21. Data transfers, storage, and processing

21.1. Our platform is hosted in the United Kingdom on AWS servers. Some of the services mentioned above may be hosted outside the UK.

Contact information

o **Owner and Data Controller**
Etho Informatics Ltd
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Cheltenham
GL50 3DT
Owner contact email: team@etho.co.uk