

592732 Benify Health Challenge Privacy Policy

In this privacy policy you will find information about: how Benify process your personal data as data processor in connection with the Benify Health application (hereinafter referred to as the 'Application').

In this policy, we refer to 'you' when we mean employees who use the Application.

The independent processing of personal data by third parties is subject to their own privacy policies. Benify is not responsible for such processing of personal data by third parties.

1. What personal data is processed by Benify

Personal data we may collect from you:

- Information related to the use of the Application: unique cookie information of the device, technical information regarding, for example, the operating system of the device and the IP address.

Personal data we may collect from third parties:

- Activity data: The data used to calculate the activity level is obtained from your Google Fit application based on your consent and on the basis of an agreement between Benify and Google Ireland Limited ('Google') (disclosure of personal data from Google to the Benify). Benify acts as the data processor of the activity data disclosed by Google, as Benify only obtains this data on behalf of its client/your employer. Based on the activity data, Benify provides the activity level calculation.

Google acts as the data controller for the personal data collected by the Google Fit application. You can read the Google Fit application's privacy policy in the Google Fit application.

2. How Benify can use your personal data and on what legal grounds?

Benify processes personal data as processor on behalf of our clients for the purposes mentioned below. The legal basis for the processing is thus determined by the client as controller, but is usually divided into consent, performance of contract, legal obligation or legitimate interest.

Consent:

- Obtaining the activity data from Google Fit application used to determine the activity level when delivering the Benify Health Challenge.
- Setting and accessing non-required cookies in your device.

The consent is completely voluntary, and you can withdraw if you wish and at any time during the Benify Health Challenge. If you withdraw your consent, you no longer participate in the Benify Health Challenge, and any incentives provided from the Employer will be waived.

Performance of the contract:

- Managing the application and taking the necessary measures to fulfil other contractual obligations.

3. Recipients of personal data

As a rule, personal data is stored only in the territory of the European Union and the European Economic Area.

Due to technological solutions, in certain situations we may transfer your personal data to parties located in third countries. Any transfer of personal data to third countries shall be carried out in accordance with the data protection regulations in force at any time, including in accordance with the safeguards required by the data protection regulation at any time.

4. Your privacy rights

As a data subject, you have rights in relation to personal data processed by Benify as a data controller:

- a) Right to request access to your personal data. You have the right to access your personal data in our possession (right of access).
- b) Right to request correction of incorrect or incomplete data (right to have the data corrected).
- c) Right to request erasure.
- d) The right to restrict the processing of personal data.
- e) The right to object to the processing of data on the basis of our legitimate interest.
- f) Right to data portability.

5. How long does Benify store personal data

Benify will retain your data for as long as it is needed for the purposes described in section 2. For example, your activity data will be deleted after determining your activity level.

The retention periods mentioned herein do not affect the retention of similar personal data for purposes other than those mentioned in this Privacy Policy.

6. How to make changes to this privacy policy

Benify complies with national and EU-wide data protection legislation.

Benify continuously improve and develop services and products offered in the platform. Employers and employees will be noticed if significant changes to this privacy policy come into effect.