

Nmible Privacy Policy

Introduction

Welcome to Nmible Limited's privacy policy. We respect your privacy and are committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you use our app (regardless of where you use it) and tell you about your privacy rights and how the law protects you.

1. Important information and who we are

Purpose of this privacy policy

This privacy policy aims to give you information on how Nmible Limited collects and processes personal data through your use of Nmible's app, including any data you may provide through the app when you sign up to our services.

Our app is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller/Processor Position

Nmible Limited is the controller and responsible for your personal data (collectively referred to as "Nmible", "we", "us" or "our" in this privacy policy) where we process personal data directly from our customer.

Where we are instructed by our customer to process personal data on their behalf and we act in accordance with their instructions we act as the processor. In this instance the reimbursement app are for a user of our customer.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our data privacy manager in the following ways:

Full name of legal entity: Nmible Limited

Email address: dataprivacy@nmible.com

Postal address: 1st Floor Healthaid House, Marlborough Hill, Harrow, Middlesex, England, HA1 1UD

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes Participant ID and year of birth. Full name is also required for US citizens (due to tax reporting laws) and for users who choose to be paid through the nmible virtual card method.
- **Contact Data** includes email address and telephone number. Note email address is only required for US citizens (due to tax reporting laws) and for users who choose to be paid through the nmible virtual card method. Telephone number is only required for users who choose to be paid through the nmible virtual card method.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to you.
- **Technical Data** includes current app status and user settings.
- **Communications Data** includes textual comments or questions from you, and your notifications permission.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific app feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data when you:

- initially register as a user within our app;
- enter payment- or reimbursement-related information using our app;
- give us feedback or contact us.
- **Automated technologies or interactions.** We do not use cookies to store or manage data. We save minimal technical data relating to the current state of the app and user settings you have selected.
- **Third parties or publicly available sources.** We do not receive personal data about you from third parties other than the controller when we act as a processor.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we as a processor need to perform the contract we have entered into with customer for a user to utilise the app and its functions.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests for example to ensure the effective running and monitoring of the app.
- Where we need to comply with a legal obligation.

Where you are a user of the app you consent to the download of the app onto your device.

Purposes for which we will use your personal data as controller

We have set out below, in a table format, a description of all the ways we plan to use personal data, and which of the legal bases we rely on to do so where we act as controller. We have also identified what our legitimate interests are where appropriate.

Note that we may process personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To provide services including: (a) Manage payments to you (b) Receive feedback or requests for support from you	(a) Identity (b) Contact (c) Financial (d) Transaction	Performance of a contract with you

To manage our relationship with you which will include notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation
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Where we act as a processor we act in accordance with the controller's instructions.

Change of purpose

Where we act as a controller we will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

To provide our services on behalf of customer we may share personal data with the parties set out below for the purposes set out in the table above:

- Our third party suppliers may include, but are not limited to, Checkbook Inc., Wise Europe SA, Western Union, and SPAN Enterprises.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

We do not transfer your personal data outside the region of origin e.g., European Economic Area (EEA) or the USA.

However, many of our third-party suppliers are based outside the region of origin so their processing of your personal data will involve a transfer of data outside that region.

Whenever we transfer your personal data out of the region of origin, we ensure a similar degree of protection is afforded to it by ensuring that safeguards are implemented, as follows:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.

- In relation to external third-party service providers, we may use specific contracts approved for use in the UK and or the EU which give personal data the same protection it has in the UK and the EU respectively.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my personal data for as a controller?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: see 'your legal rights' below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Where we act as the processor for our customer the retention period is set in line with the customer's direction.

9. Your legal rights

Where we act as the controller under certain circumstances, you have rights under data protection laws in relation to your personal data, as follows:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful but you do not want us to erase it.
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Where we act as the processor due to the functionality of the app you as a user may be able to exercise your rights directly on the app such by updating and deleting your personal data. Where we act as the processor we may be asked to go back to our customer to seek permission to assist in exercising an individual's rights who is categorised as a user.

If you wish to exercise any of the rights set out above, please contact us in the first instance.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Complaints and concerns

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.