

**Last updated in October 2020**

## Introduction

Here at Collective Society Ltd (that's our fancy official legal name and more simply "we" or "us" and where required, "Collective", "Collective Benefits", "[collectivebenefits.com](https://collectivebenefits.com)" also meaning the website and application [www.collectivebenefits.com](https://www.collectivebenefits.com) and [app.collectivebenefits.com](https://app.collectivebenefits.com) and referred to as "our site" and "our website"), we take your privacy seriously. We and our subsidiary companies listed below are committed to protecting the privacy of any personal data we collect, organise, structure, share, use, or otherwise process about you, complying with all relevant data protection legislation and only using your data as set out in this policy. That's very important to us. For the purposes of relevant data protection legislation, the relevant data controller of personal data we process about you will, for your information, depends on which company you are interacting with and what service the relevant company is performing. We are registered on the public register of fee payers maintained by the Information Commissioner in the UK.

- Collective Benefits Ltd which is a membership club

Any reference to "we", "our", or "us" shall be a reference to the relevant Collective subsidiary you are interacting with.

Please grab a cup of coffee or tea (and perhaps a biscuit if you're peckish) and take the time to read this Privacy Policy, as it is important for you to understand how we collect and use your data when you use our website. This Privacy Policy explains how we collect, use and store the personal data you provide to us.

If you have any questions about our Privacy Policy, please contact us through the details set out in the 'Get in touch' section below.

So, what data do we collect about you?

'Personal Data' is data that relates to you and identifies or can be used to identify you – this might be your name, email address, or other digital identifiers relating to you such as cookies, IP addresses or logs (think of it a little like bringing the classic board game 'Guess Who' into the 21st Century).

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

<b>Identity data</b>	Name, username, date of birth
<b>Contact data</b>	Billing address, email address or telephone numbers
<b>Marketing and Communications data</b>	Your preferences in receiving marketing from us and our third parties and your communication preferences.
<b>Profile data</b>	Username and password, income or salary information, your preferences, feedback and survey responses
<b>Sensitive personal data</b>	Your current or former physical or mental health or criminal convictions
<b>Technical data</b>	Includes cookies, internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology devices you use to access our website
<b>Transaction data</b>	details about payments to and from you and other details of services you have purchased from us, including payment card information
<b>Usage data</b>	information about how you use our website and services

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website or platform 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.

Throughout this Privacy Policy we use the terms “Partner” and “Partners” to refer to our gig economy partners and other platforms, businesses and communities that work with and support self-employed and flexible workers. Where we need to collect personal data by law or under the terms of a contract we have with you or one of our Partners and you do not provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case.

### **How do we collect your personal data?**

We collect personal information about you when you access our website, register with us either directly or via one of our Partners, contact us, send us feedback, post material to one of our platforms and or interact with us through our website (or one of our other platforms), over the telephone, or face to face.

We collect this personal information from you either directly, such as when you register with us, or contact us, and indirectly, such as your browsing activity while on our website (see ‘Cookies’ below).

We also collect personal information about you from other sources as follows:

- our Partners
- from publicly accessible sources; or
- directly from a third party, such as: sanctions screening providers; credit reference agencies; or customer due diligence providers.

### **And how do we use your data?**

We will only use your personal data when the law allows us to. We have set out below descriptions of the ways we plan to use your personal data and the legal basis we rely on to do so. Sometimes our basis for doing so is because of our legitimate interest, which we have also set out in the table. A legitimate interest is when we have a business or commercial reason to use your information which, when balanced against your rights, is justifiable.

What we use your personal information for	What personal information we collect	Our legal grounds for processing	Our legitimate interest (if applicable)
To register your interest or as a member	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Profile</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>• To develop our services and grow our business</li> <li>• If you are referred to us by a Partner</li> </ul>
To process your orders or requests and to deliver services to you effectively, which may include the selling of regulated products, <b>like insurance, unregulated products and/or access to deals, discounts and offers provided by third parties.</b>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Transaction</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Legitimate interests</li> </ul>	Being efficient about how we deliver our services and fulfil our legal obligations
To provide insurance policies, evidence of cover, processing of insurance claims and complaints relating to insurance cover or claims.	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Profile</li> <li>• Sensitive Personal</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Legitimate interests</li> </ul>	Being efficient about how we deliver our services and fulfil our legal obligations including managing and maintaining insurance policies including claims and complaints
To carry out necessary compliance and fraud checks	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Transaction</li> <li>• Usage</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary to comply with a legal obligation</li> <li>• Legitimate interests</li> </ul>	To determine whether you fall within our acceptable risk profile and to assist with the prevention of fraud

What we use your personal information for	What personal information we collect	Our legal grounds for processing	Our legitimate interest (if applicable)
<p>To manage our relationship with you which may include:</p> <ul style="list-style-type: none"> <li>a. Corresponding with you by phone, email or live chat</li> <li>b. Notifying you about changes to our terms or privacy policy</li> <li>c. Asking you to leave a review, take a survey, enter a prize draw/competition or provide other feedback</li> </ul>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Profile</li> <li>• Marketing and Communications</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract</li> <li>• Necessary to comply with a legal obligation</li> <li>• Legitimate interests</li> </ul>	<p>To manage our relationship with you and to optimise and improve our business and our services</p>
<p>To administer and protect our business and our website</p>	<ul style="list-style-type: none"> <li>• Transaction</li> <li>• Technical</li> <li>• Usage</li> </ul>	<p>Legitimate interests</p>	<p>Running our business, provision of administration and IT services, network security, and improvement of our website.</p>
<p>To send you information which we think may be of interest to you, such as newsletters, publications, information about other products and services we offer</p>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Marketing and communications</li> <li>• Profile</li> </ul>	<ul style="list-style-type: none"> <li>• Consent (for example where you have requested such information)</li> <li>• Legitimate interests</li> </ul>	<p>In circumstances where you have not requested us to send such information, we rely on our legitimate interests to send you relevant communications which we think will be of interest to you</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of advertising we serve you.</p>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Marketing and communications</li> <li>• Profile</li> <li>• Usage</li> </ul>	<ul style="list-style-type: none"> <li>• Consent (for example where you have requested such information)</li> </ul>	<p>To study how customers/members use our services, to develop them, to grow our business and to inform our marketing strategy</p>

What we use your personal information for	What personal information we collect	Our legal grounds for processing	Our legitimate interest (if applicable)
		<ul style="list-style-type: none"> <li>• Legitimate interests</li> </ul>	
<p>To communicate with you</p>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Marketing and communications</li> <li>• Profile</li> <li>• Transaction</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests</li> <li>• Consent (for example where you are not a customer, but you have voluntarily made an enquiry about our products and services)</li> </ul>	<p>It is in our legitimate business interest to process your personal data to consider and respond to communications that you send to us and inform you of relevant information in relation to y. our account or the website.</p>
<p>To use data analytics to improve our website, products / services, marketing, customer relationships and experiences</p>	<ul style="list-style-type: none"> <li>• Profile</li> <li>• Technical</li> <li>• Usage</li> </ul>	<p>Legitimate interests</p>	<p>To define types of customers/members for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy</p>
<p>To make suggestions and recommendations to you about services that may be of interest to you, including promotional offers.</p>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Marketing and communications</li> <li>• Profile</li> <li>• Technical</li> <li>• Usage</li> </ul>	<ul style="list-style-type: none"> <li>• Consent (where you are not an existing customer and have not opted out of such communication)</li> <li>• Legitimate interests</li> </ul>	<p>To develop our services and grow our business</p>

Please be aware that we may process sensitive personal data (the official legal name under GDPR is “special category data”), particularly relating to your current or former physical or mental health but unless we are permitted by law we will never do so without your explicit consent. We may need to do so to provide you with your insurance cover, administer your policy, process your claims and manage any complaints relating to the same. You can withdraw your consent at any time by contacting us through the details in the ‘Get in touch’ section below. Be aware that if you do withdraw your consent it may not be possible to continue providing your insurance.

If you have carefully read the table, the eagle-eyed amongst you will notice that we do not take or store any of your financial information such as bank details or credit cards. These are securely handled directly and independently by our payment providers who only provide a payment confirmation to us. If you need to make payment through our website this will be done by what is called an API (essentially a digital tunnel) to our payment provider websites.

Please review their privacy policy to understand how they look after your payment data.

We are also entitled to process personal data where necessary to comply with any legal obligations which we are subject to; to establish or defend any legal claims so as to protect our or your legal rights, or the legal rights of other interested parties; or to obtain or maintain our own insurance cover, obtain professional advice or otherwise manage business risks.

## Marketing and Opting Out

As we’ve said above, we will only send you information which we think you will be interested. Where you are not a customer this will be where you have requested it. Where you are a customer, we gave you an option to opt-out of receiving such information when you registered with us. If you didn’t opt-out, then but have now changed your mind please feel free to opt-out at any time.

We understand that you do not want your inbox full of unwanted messages. We will get your express opt-in consent before we share your personal data with any other company for the purposes of third-party marketing. You can ask us or third parties to stop sending you marketing messages at any time by contacting us through the details set out in the ‘Get in touch’ section below.

Where you opt-out of receiving marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, claims processing or any other transaction.

## Use of Cookies

No not the biscuit you’re currently eating. We use cookies in accordance with our cookie policy, if you want to learn more about them click [here](#).

## Now we have your data, how do we look after it?

We have put in place security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. These measures include using bank-grade encryption to protect your data when we store it and we ensure that, if we are sending it across the internet, it is encrypted. We also limit access to your data to those employees, agents, contractors and other third parties who have a business need to access it.

## And how long do we keep your data for?

We only keep data for as long as we reasonably need it, including for the purposes of satisfying any legal, accounting or reporting requirements. We keep certain data on record for seven years to ensure we meet the FCA's requirements. You can request that we delete your personal data at any time, we are not obliged to delete the data in all circumstances. We will not delete the data when we continue to have a legal basis to process it. Please be aware that we are not allowed to delete data which is required for fraud detection and other legal reasons. In some circumstances we may anonymise your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## Do we share your information with anyone else?

We may share your information:

- As necessary in order to provide our Services especially with our insurance partners and our insurance principal.
- If you specifically request this, such as when you submit information to enquire about our products or services, to make a claim or apply for a job.
- When we are required to do so to comply with a contractual obligation or legal requirement or with the directions of the courts or other authorities.
- To prevent illegal activity or to protect our interests.
- Where it is needed to help our trusted third-party services to provide and improve our services to you, such as our insurance partners, underwriters or claims management providers, to carry out surveys and user analysis to understand your needs and preferences. We contractually require these service providers to keep your personal data safe and secure and to treat it in accordance with the law. These trusted parties would only be permitted to use your personal data for the purposes we specify.
- With our banks, professional advisers, debt collectors, insurers and brokers, credit reference agencies and auditors to manage and administer our business.
- As necessary to defend or protect our legal rights.

Our website may include links to third party websites, plug-ins and application. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy notices and privacy policies. When you leave our website, we encourage you to grab another cup of coffee or tea (and a biscuit if you have not already done so) and read the privacy notices and policies of every third-party website you visit.

## Will we transfer any of your personal data outside the EU?

Countries outside the European Union may have a lower standard of protection for personal data than that required by EU data protection laws or UK data protection laws. The information we collect from you may be transferred to and stored outside the EU (including for example the United States of America) and may also be processed by people operating outside the EU who work for us or one of our suppliers. If we need to transfer your data to a company based outside the EU (e.g. to provide technology for email, subscription and payment support), we will take steps to make sure your personal data is handled in line with EU and/or UK law. by implementing appropriate safeguards, such as a European Commission adequacy decision, the EU-US Privacy Shield Certification or the EU Commission approved Standard Contractual Clauses. If you would like any more detail, please get in contact with us through the details set out in the 'Get in touch' section below. During the Brexit transition period data transfers are still governed by EU and UK law. We are monitoring progress of negotiations between the EU and the UK and we will ensure that we make any changes required as negotiations progress.



## What if we make changes to our business?

If we are subject to negotiations for the sale of our business or part of it, we are sold to a third-party or undergo a reorganisation we may need to first disclose and transfer some or all of your personal information to the relevant third-party or its advisors as part of the due diligence process. Our legal ground for doing this is our legitimate interest to make changes to our business. If a new business purchases us and we no longer run this business your data will be transferred to that new company and they will be in contact with you about how they process your data. We will ensure that they comply with this Privacy Policy until they update with you with their privacy policy.

## What are your rights?

You have the right to stop using our website at any time. Please note that, in these circumstances, we may keep your data for the reasons set out in the 'And how long do we keep your data for?' section above.

You also have the following rights when it comes to our handling of your personal data:

- **Right of access** – you have the right to request a copy of the personal data we have about you and to request supporting information explaining how the personal data is used. You are entitled to know whether or not we process personal data about you; the purpose for which we process your data; the categories of your data we process; details about who we share your data with and if it's transferred outside the EEA; if you didn't provide your data to us, details of where we got it; the criteria for determining our retention periods.  
Please note that sometimes we may ask you to provide proof of identity before we show you your personal data - so we can prevent unauthorized access and ensure we are complying with the data protection laws.
- **Right of rectification** – you have the right to request that we rectify any inaccurate or incomplete personal data about you that we have.
- **Right of erasure** – you have the right to request that we erase all personal data about you that we have (please note that we may be able to reject or restrict the request in some circumstances, depending on the information we hold and our lawful reason to keep it). You will have a right to erasure where: we rely on consent and you have withdrawn it; to comply with a legal requirement; we rely on legitimate interests and following your objection we do not have an overriding right to continue; the purpose for which we originally collected your data has finished.
- **Right to restrict processing** – in some situations, you have the right to request that we do not use the personal data you have provided (e.g. if you believe it to be inaccurate or if you have object to us processing on the grounds of legitimate interest).
- **Right to object, including to direct marketing** – you have the right to object to certain processing by us of your personal data (unless we have overriding compelling grounds to continue processing) and the right to object to direct marketing by us.
- **Right to withdraw consent** – you have the right to withdraw consent at any time where we are relying on consent to process your data.
- **Right to data portability** – you may have the right to request that we provide you with certain information that you have provided to us in electronic format or to provide that information to a third party if such data is processed by us on the basis of consent or performance of a contract.

If you would like to exercise any of these rights (including having access to your personal data), please contact us through the details set out in the 'Get in touch' section below.

## Get in touch

We understand you may have questions, requests, comments and complaints arising from this Privacy Policy. If so, just get in touch with us through the following details:

Collective Society Ltd  
201 Haverstock Hill  
Second Floor c/o FKGB  
London NW3 4QG

[help@collectivebenefits.com](mailto:help@collectivebenefits.com)

Congratulations on reading all of this – we hope you enjoyed that cup of coffee or tea and go on, treat yourself to a biscuit. We love a custard cream.

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, who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113. We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.