

## Privacy statement



Every employee deserves to work in an environment where healthy behaviour is a given. The inspiring and energising approach taken by Halo helps employers and employees to make healthy behaviour a logical choice. Our approach includes an online environment where we provide you with support in the form of questionnaires and a training course.

Halo is part of Arbo Unie B.V. and is responsible for processing your personal data within the meaning of the General Data Protection Regulation (GDPR). Arbo Unie is not reliant on investors and can guarantee full independence. Arbo Unie is established at Nevelgaarde 42, 3436 ZZ Nieuwegein.

Halo and Arbo Unie will protect your privacy and act in accordance with the applicable privacy legislation and guidelines. When using Halo services you share your personal information with Arbo Unie, for example, when using the application through the Halo habits game. For that reason, Halo carefully monitors the recording and processing of that information.

Halo will be happy to let you know, on behalf of Arbo Unie, what data we process and why, and how we safeguard your privacy. This privacy statement applies to the complete Halo programme. The conditions of use apply to the use of the Halo application. You will find them on Halo's website.

### 1. Which of my personal data will Halo process and why?

We will process your data to provide insight into your personal development during the programme through Halo's online environment. Those data are personal data (including your name, date of birth, gender and email address) and the data you provide us with when you register and/or for any health surveys you participate in voluntarily. The data you provide are required to enable you to take part in the process offered by Halo. The data you provide will be stored within Europe. As mentioned in the terms of use, it is not our intention that you should leave your medical data in the Halo habit environment. Halo does not process special personal data or medical data. Halo does not use automated decision-making or other algorithms, including profiling.

In addition, we use the data of all participants on an aggregate basis, i.e. they cannot be traced back to an individual, to advise employers. We use anonymised data to advise employers.

If you invite a buddy to participate in the Halo habits game, Halo will not process those data. The data created by the buddy will be accessible only to the buddy or the people with whom the buddy wishes to share the data. In other words, the buddy can decide himself or herself with whom the data is shared.

We strive to continuously improve the quality of our services. We may therefore use your answers to questions to conduct scientific and statistical research. To this end, we anonymise all data and information before it is used for scientific research. If we want to process your data for another purpose, we will first ask for your permission again. You may object to such use.

2. Will you provide my employer with my results?

We will never provide your employer with your personal results. Nor will your employer find out whether you have participated. Your employer will receive a recommendation and feedback once the data have been anonymised and aggregated in a group report. Group reports are drawn up only where there is a group size of at least fifteen participants. Fifteen participants is the minimum number if a group report is to be reliable; any smaller number produces unreliable results.

3. Can I be sure that my data will not be shared with anyone else?

Yes - we set stringent requirements to safeguard the privacy of our participants and will not pass on your data to third parties. We do, however, engage chain partners who, under our supervision, may carry out certain processing operations (or parts thereof) ('Processors'). These Processors always act under our responsibility and may not use your data for other purposes in any circumstances. We conclude what are known as Processing Agreements with those Processors to ensure that your privacy is also fully guaranteed there.

4. Will you secure my data?

Yes, when processing your data, we maintain a technical and organisational security level at all times when processing your data that, given the state of the art, can adequately protect your data. We have our information security certified annually in accordance with the applicable ISO 27001 and NEN 5710 standards.

5. Am I obliged to share this information?

Your participation in the programme is at all times voluntary. By opting to participate, you are agreeing to this privacy statement and the terms of use applicable to the application. You are not obliged to share the information with third parties (except Processors).

6. Can I see which of my data you are processing and can I have them corrected?

Yes, of course, after logging in to [Halo habit](#), you can view your data under 'my data' ('mijn gegevens'). You can correct your contact details here. You can also continue to view the data we collect and which you add during the term of the [Halo habit](#). The answers you give in the online questionnaires through the [Halo meter](#) will be stored anonymously and you will not be able to view them thereafter. Please contact us at [info@halowerkt.nl](mailto:info@halowerkt.nl) if you have any questions about the term of the agreement.

7. For how long will you keep my data?

Generally speaking, we will not keep your data for any longer than is necessary to fulfil the purposes for which they were collected and processed. We will also remove the

data identified as being out-of-date or if you separately or otherwise request their deletion. The data processed in the Halo habit will be kept for up to four years after you last use the Halo habit (assuming the application is still being provided). This will enable you to use the Halo habit again at a later date while retaining your personal data. You will also be able to reflect later on at the healthy choices you have made and the personal development you have achieved after completing the programme in the Halo habit.

#### 8. What if we have a dispute?

Dutch law applies to this privacy statement. The privacy statement does not affect the user's mandatory rights as an employee. Any disputes about this privacy statement will be submitted to the competent court at Utrecht.

#### 9. Thank you for this information, but I have a few more questions. Who can I contact?

If you want more information or have any questions and/or comments regarding the above, please do not hesitate to contact Halo by email at [support@halowerkt.nl](mailto:support@halowerkt.nl). Read more about our terms of use [here](#).

If you would like to contact Arbo Unie's Data Protection Officer, you can do so through [functionarisgegevensbescherming@arbounie.nl](mailto:functionarisgegevensbescherming@arbounie.nl).