

Kaido Group Ltd Privacy Policy

Effective Date: 05/06/2017, Last Update: 22/11/2017

The following provisions will inform you of the manner, scope and purpose of any collecting, processing and disclosure of personal data by Kaido. In this privacy policy, the terms “Kaido” “We” “Us” and “Ours” refer to:

- Kaido Group Ltd – A Company incorporated in the UK

Registered address:

iCentrum, Innovation Birmingham Campus,
6 Holt Street,
Birmingham Science Park Aston,
Birmingham
B7 4BP
Registered number 9440706
E-Mail: info@kaido.co.uk

The policy operates with regard to the services offered on the Kaido Wellbeing website (<http://www.kaidowellbeing.com/>) the Kaido Website (<http://www.kaido.co.uk/>) as well as Kaido Wellbeing Apps and Web Services.

The term ‘website’ means the website located at www.kaidowellbeing.com.

The purpose of this policy is to tell you what kind of information we may gather about you when you visit the website, how we may use that information, whether we disclose it to anyone and the choices you have regarding our use of, and your ability to correct this information. It is our prior objective to ensure the privacy, integrity and security of all personal data of our users at all times.

Types of Information we collect:

Information is collected from you primarily to make it easier for you to use and gain enjoyment from the Kaido services. Kaido only collects such information when you provide it to us. We shall process your personal data only in accordance with the provisions of British Data Protection act 1998 C.29 (<http://www.legislation.gov.uk/ukpga/1998/29>) and European data protection law. Personal data shall mean any information relating to an identified or identifiable natural person. The European Standards of data protection are laid down in the Directive 95/46/EC of the European Parliament and of the Council of 24 October 1995 on the protection of individuals with regard to the processing of personal data and on the free movement of such data.

- Registration:
 - o To register as an employee Kaido requests your Name, Date of Birth, Email Address and Mobile Number. This information is used to bring you the service requested and will be your personal login ID to create an account, along with a password that is saved in our database (collectively referred to as “Registration Information”).
 - o When you register, we shall also save your IP-address as well as the date and time of your registration. This is to protect our legal rights in case any third party uses your personal data to register to our website. These data entries are not disclosed to any third parties.
 - o In addition to register as a business you are asked to provide Registered address and in some cases billing address, shipping and payment information.
 - o We require this information solely for the purpose of acceptance and fulfilment of your online order.

- On-boarding:
 - You are asked to upload an Avatar profile image that is viewable by other users of the website, however this is not mandatory.
- Activity Tracking:
 - We collect certain personal health information such as your height, weight, gender. This is used to calculate your BMI (Body Mass Index) which is then used to provide personalised feedback to you.
 - Physical Activity data is collected to inform the calculation of your individual Wellness Score.
 - The analytics engine (known as the Kaido Insights Engine) anonymises data at the point of entry and presents users at a UDID (Unique Identifier) thus has no way of connecting processed data with you as an individual.
 - This data (Type, Steps, Time Active, Time Inactive, Duration) is collected through two methods:
 1. Through connected devices. This may be through a connected smartphone, mobile application or wearable device.
 2. Through Manual input into the system by you performing an activity search.
 - The integration of the above-named devices is managed through a 3rd party provider named here as Human API. Their Privacy Policy can be found here: (<https://www.humanapi.co/privacy>)
 - Please note Human API do not receive any of your personal information and access to such information is at your discretion during the registration process.
 - We do not ask you for, access or track any location based information at this time.
- Other:
 - You will be asked to create a team to complete the challenge. To do this you will be asked to create a team name and the email addresses of the colleagues you wish to form a team with. OR create an open team that is searchable by colleagues.
- Service and Device data plus other anonymised information:
 - Due to technical reasons, we may collect technical and navigational information, such as computer browser type, operating system, Internet protocol (IP-)address, pages from which you visited us (referrer URL), other pages you visit and average time spent on our Site ("Server log-files").
 - This data is collected in anonymised form and saved apart from your personal data thus not allowing any re-connection to an individual person.
 - This information may be used for statistical purposes, to optimise our internet performance and the quality of our services.

3rd Party Integration:

- Human API:
 - Human API is 3rd party application licensed by Kaido Wellbeing for the collection of consumer activity data from connected devices.
 - Human API allows you as a user to connect your favourite health and wellness trackers and share this data with Kaido Wellbeing for the purpose of the challenge.
 - Their Privacy Policy is available here: (<https://www.humanapi.co/privacy>)
 - These services will authenticate your identity, provide you the option to share certain personal information (such as your name and email address) with us, and to pre-populate our sign-up form.
- Facebook:
 - Some Kaido Wellbeing services offer login and registration via Facebook. In this case Kaido may access your location and preference data, however access to such data is at your discretion.
- The Kaido Insights Engine:
 - The Kaido Insights Engine is the analytics engine that powers the Kaido Wellbeing challenge.
 - Anonymised health data is passed into the engine, analysed and passed back to the system in an insightful manner.
 - If you do not want your data to be shared with the insights engine you can opt out although this will affect the quality of the service.

How we use your information:

Users of Kaido Wellbeing either download an app onto their phone or access through the website which connects securely to the Kaido Insights platform using a HTTPS API with TLS encryption (specifically TLS v1.0-1.2 with a 2048 RSA key). The platform is delivered using Amazon Web Services (AWS) which is accredited to a variety of standards including ISO 27018 (a specific code of practice for managing personal data in the Cloud). Access to all data and insights is tightly scoped to a specific users' account preventing one user seeing another's data.

Our principal integration with health devices (apps, wearables and IoT devices) is through Human API, a third-party provider that aggregates and normalises wearable data in a secure manner. Once a user has joined Kaido, they have the option of connecting their devices using Human API, which is done through a simple and secure step by step (wizard) process. If they change their minds, users can revoke access to their device data whenever they choose. Human API push activity data to us via another HTTPS API and we then store this data in our Health Database.

Our Health Database stores all data against a Unique User Identifier away from other personal and identifiable data held by Kaido. By separating this data, we ensure that no identifiable activity data is stored in a single location. All of our health insights are derived from this non-human identifiable data. Considering the scenario of a data leak, a malicious third party would have to obtain copies and access to these multiple datasets in order to assemble identifiable health data.

All of our databases run on AWS's RDS platform which offers best practice security and good availability (regular backups are automatically managed to provide effective business continuity). All internal staff activity is logged and logins to servers involves use of personally identifiable accounts and authentication using strong SSH-based certificates. We regularly review our working practices to ensure we continue to operate at the highest level of security that we can.

Kaido will only use or disclose the personal information you have chosen to provide us with for the purpose for which you provided it. Kaido will not use it for any other purpose without your consent. We may use your personal information to: fulfil your registration, send you an order confirmation, send you requested service information, respond to customer service requests, administer your account, allow you to track your activity week to week, allow you to participate in challenges, see teams progress, send you a newsletter, send you marketing communications, administer contests you entered (and notify you if you won), improve our Website and marketing efforts, and display content based upon your interests.

We may also use or disclose your anonymised information for reporting purposes. For instance, we may use or disclose anonymised information about your participation in the Kaido Wellbeing challenge and aggregate performance information, and summary information about participants. We may also use or disclose your information for research and reporting purposes. For instance, we may use or disclose your information to better understand aggregate sleep patterns and daily active movement for a defined population.

As is true of most websites, we gather certain information automatically and store it in log files. This information includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and clickstream data. We use this information, to analyse trends, to administer the site, to track users' movements around the site, and to gather demographic information about our user base.

In addition, access to your personal data and other sensible information is strictly restricted to Kaido Wellbeing employees and contractors, as needed in order to operate, develop or improve the Service, and subject to specific internal procedures and safeguards. These individuals are selected in accordance with our security-policies and -regulations and are bound by confidentiality obligations. They may be subject to disciplinary measures, including possible dismissal and other sanctions, if they fail to meet these obligations.

From time to time, we may request other personal information to provide you with other benefits of the Service. In all such instances, you will be given the option of whether or not to provide that information, and any information you provide will be used only for the purpose stated at the time you provide that information. After that purpose is achieved, the collected personal data will be utterly deleted.

Exceptional cases of data disclosure for our legal protection:

Notwithstanding the foregoing, Kaido reserves the right to share or disclose your personal information when it determines, at its sole discretion, that the disclosure of such information is necessary and appropriate:

- To enforce our rights against you or in connection with a breach by you of this Policy,
- To prevent prohibited or illegal activities or
- Where we are obliged to such disclosure by the applicable law.

Access to your personal information:

Upon request Kaido will provide you with information about whether we hold any of your personal information. If your personal information changes, you may correct, update, amend, ask to have it removed from a public forum, directory or testimonial on our site or deactivate it by making the change on your member settings page, or by emailing our Customer Support at support@kaido.co.uk or by contacting us by telephone or postal mail at the contact information listed above. If you no longer desire our service, please contact customer service. We will respond to your request within 30 days. We will retain your information for as long as your account is active or as needed to provide you services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Personal information we process on behalf of our clients:

The use of information collected through our service shall be limited to the purpose of providing the service for which the Client has engaged: 'Kaido Wellbeing Workplace Wellness'. Kaido collects information under the direction of our Clients, and has no direct relationship with the employees whose personal data we process. If you are an employee of one of our Clients and would no longer like to be contacted by one of our Clients that use our service, please contact the Client that you interact with directly. We may transfer personal information to companies that help us provide our service. Transfers to subsequent third parties are covered by the service agreements with our Clients.

Kaido acknowledges that you have the right to access your personal information. Kaido has no direct relationship with the individuals whose personal data it processes. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data should direct their query to the Kaido Wellbeing Client. If requested to remove data, we will respond within a reasonable timeframe. We will retain personal data we process on behalf of our Clients for as long as needed to provide services to our Client. Kaido will retain this personal information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Opt Out Preferences:

If you wish to subscribe to our newsletter and other communications, we will use your name and email address to send those communications to you. Out of respect for your privacy, you may choose to stop receiving our newsletter or marketing emails by following the unsubscribe instructions included in these emails, or you can contact us at support@kaido.co.uk.

We may provide you the opportunity to participate in surveys on our site. If you participate, we may request certain personally identifiable information from you. Participation in these surveys or contests is completely voluntary and you therefore have a choice whether or not to disclose this information. The requested information typically includes contact information and demographic information (such as zip code / post code). We will not share the personally identifiable information you provide through a contest or survey with other third parties unless we give you prior notice and choice.

Tracking Technologies:

Technologies such as: cookies, beacons, tags, scripts and other similar technologies are used by us and our service providers, technology partners or other 3rd party assets (such as social media). These technologies are used to help administer the site, identify the total number of users, measure traffic patterns for research purposes, personalise or customise content so that a user's preferences can be "remembered" when they return to the site, and to better manage content.

Kaido may collect information via cookies. If Kaido collects personal information via cookies, then that personal information will be dealt with by Kaido in accordance with this privacy policy. Thus information collected via cookies will be treated in the same way as any other information. You can remove cookies by following directions provided in your Internet browser's "help" directory. If you reject cookies, you may still use our site, but your ability to use some areas of our site will be limited.

We may also use third party service providers such as Google Analytics to help us analyse certain online activities and improve our products and services. For example, these service providers may help us measure the performance of our online campaigns or analyse visitor activity on the Kaido Wellbeing Website. We may permit these service providers to use cookies and other technologies to perform these services for Kaido Wellbeing.

We do not share any personal information about our customers with these third-party service providers, and these service providers do not collect such information on our behalf.

Protection of Personal Information:

We will not, without your consent, sell or otherwise disclose your personal information to a third party, or make any other use of your personal information, for any purpose which is not related to your use of the Website and Services, unless otherwise permitted to do so by law. We may disclose your personal information as required by law, such as to comply with a subpoena, bankruptcy proceedings, or similar legal process when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request. Unless in using the Website or Mobile Applications you expressly or impliedly agree to make certain information available, all personal information which we collect is kept confidential to the best of our ability, subject to the other terms and conditions of this privacy policy. In addition, our employees and contractors who provide services related to our Website or Mobile Applications are obliged to respect the confidentiality of any personal information held by us. Our employed staff and contractors engaged by us for technical and support purposes may have access to personal information that you provide and may access it for purposes that include the audit of content on the Website, quality control purposes and for compliance with our Website [Terms and Conditions](#). These contractors are authorised to use your personal information only as necessary to provide these services to us.

Blogs/ Testimonials/ Public Comments and Profiles:

Our Website offers publicly accessible blogs or community forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. To request removal of your personal information from our blog or community forum, contact us at support@kaido.co.uk. In some cases, we may not be able to remove your personal information, in which case we will let you know if we are unable to do so and why.

We display personal testimonials of satisfied customers on our site in addition to other endorsements. With your consent, we may post your testimonial along with your name. If you wish to update or delete your testimonial, please contact us.

The profile you create on our site containing personal information, such as your full name, can be made visible to other registered members at your discretion. You may change the privacy settings through your profile page.

Links to 3rd Party Sites:

Our Website also includes Social Media Features, such as the Facebook Like button, links to our social media pages and Widgets, such as the Share this button or interactive mini-programs that run on our site. These Features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our Site. Your interactions with these Features are governed by the privacy policy of the company providing it.

Changes to this Policy:

We do periodically update this Privacy Policy. Changes are effective with their publication. Kaido will notify all Users of the updated PP and ask them to accept it anew. If a User does not accept the updated PP, they can cancel their agreement and demand the deletion of their User account.

This Privacy Policy was last updated on 22nd November 2017.

For support please contact support@kaido.co.uk or call the office directly on 0121 250 5795