



## Privacy Policy

### 1. Who are we?

We are Isio Group Limited, a business registered in England and Wales with registration number 12273083. Our registered office is located at 10 Norwich Street, London, EC4A 1BD.

This online portal allows you and Isio to manage employee benefits. As you are someone who accesses and uses this portal, we process some of your personal data.

This privacy notice describes how we use your personal data. Please read it carefully along with our Cookie Policy. We may make changes to this notice from time to time, so please check it regularly. We will make you aware when it has been updated.

### 2. Data controller

As we are your employer and have decided to use this portal to manage your employee benefits, we are considered to be the data controller of your personal data as defined by UK data protection law. We will at all times only collect and process your personal information in accordance with the UK General Data Protection Regulation, the UK Data Protection Act 2018 and any other applicable data protection legislation.

### 3. Data Protection Officer

If you wish to exercise your rights under UK data protection law, you can do so by contacting [dataprivacy@isio.com](mailto:dataprivacy@isio.com).

If you wish to opt-out from Isio using your data as part of any future developments of our AI tools then you can either email [cortexteam@isio.com](mailto:cortexteam@isio.com) or [dataprivacy@isio.com](mailto:dataprivacy@isio.com).

### 4. The personal data we process

You have already provided, as part of your employment arrangements with us, some of the personal data that we process about you in providing you with access to and use of this portal. We may also collect some additional personal data from you while you are using the portal in order to be able to provide the service to you.

We have described below the personal data that we process, what we use it for and where we get it from (which, in each case, may vary depending on the way in which you access the portal).

Personal data type	What we use it for	Where we get it from
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Personal data you provide when you access and use the portal. This includes information you provide when using the portal to select your employee benefits, such as details of your dependants (e.g. your partner or children), home address, preferences and reminders.	To allow us to correctly process your employee benefits and to help you find benefits to suit your needs.	You
Personal data you provide when you contact us (including by email or telephone) about the portal. For example, when you open a support ticket.	To be able to communicate with you and assist you with your request.	You
Details of your use of the portal. For example, the pages you visit, benefits you select and the time you spend viewing a page.	To help us to improve the portal and to review the benefits we offer to employees	You
Technical information about your computer or mobile device including details such as your operating system and web browser. This is statistical data and does not identify your individual device.	To help us to improve the portal and fix problems.	You
Information used to identify how you are connecting to the portal, such as your IP address.	For security reasons, so that we can link any actions made by your account in the portal with your internet connection (for example, to allow us to identify suspicious behaviour).	You
Your personal details such as your name, address and date of birth.	To uniquely identify you in the portal.	Your employment records
Your email address	To communicate with you about the portal. For example, to let you know when it's time to select your employee benefits.	Your employment records

Details about your employment, such as your job title, dates of employment and salary.	To determine your eligibility for employee benefits and to display information to you in the portal.	Your employment records
Details relating to your employee benefits, such as your holiday entitlement or pension contributions.	To present you with your benefit options and your past selections, as well as to generate your Total Reward Statement.	Your employment records

## 5. Lawful basis for processing

UK data protection law requires the data controller to have a lawful basis for processing your personal data.

Our lawful bases for processing in this context is as follows: Contract (to fulfil our employment contract with you), Legal Obligation (the processing is necessary for Isio to comply with the law – e.g. the offer of a pension) and Legitimate Interests (to ensure Isio runs its business efficiently and offers a competitive benefits package).

## 6. Processing special categories of data

UK data protection law identifies special categories of data that are considered especially sensitive and so can only be processed under certain conditions.

We may process special category data through the portal via the use of 'Sam', our AI assistant, where you can ask questions relating to benefits and your eligibility. You are in control of whether you disclose this information or not and you can ask us to delete it at any time.

## 7. Automated decision-making

This portal performs automated processing of your personal data to establish your eligibility for particular benefits. This decision-making is based on assessment of the personal data we hold about you against certain eligibility criteria. These eligibility criteria are defined and configured in the system by us, as your employer.

We may also process your data using AI if you use 'Sam', to help you answer questions regarding policies and benefits. You are in control of whether you disclose this information or not and you can ask Isio to delete it at any time.

UK data protection law places specific restrictions on the use of solely automated decision-making and limits the lawful bases on which the data controller can rely for processing personal

data in this way. The lawful basis that we have defined in section 5 above takes into account the automated processing performed by this portal.

UK data protection law provides you with a specific right to opt out of automated processing. Please refer to section 11 below for further details on how to exercise your rights as a data subject.

## 8. Sharing your personal data

We will share your personal data with:

- The supplier of the portal technology, Avantus, acting as a data processor, for the purpose of providing the portal.
- External service providers, to enable access to additional benefits that are available via the portal (if enabled).
- Email relaying service providers, to enable us to communicate with you.

We, or the supplier of the portal technology, Avantus, may also use personal data to produce anonymised management information reports or analysis for internal purposes.

## 9. How long we will keep your personal data

We will process and retain your personal data in this portal as described in section 4 above for as long as is necessary to provide this portal, to fulfil and manage your employee benefits, and to comply with any applicable legal obligations.

The exception to this is if, as a result of you making a request as described in section 11 below, we are required by law to stop processing or storing your personal data in this portal.

## 10. International transfer of your personal data

The personal data that we process about you in relation to this portal will be held within the UK or transferred to the European Economic Area (EEA) or Switzerland, which is permitted under UK law.

## 11. Your rights as a data subject

At any point while we are holding or processing your personal data, you have the following rights:

- Right of access  
You have the right to request a copy of the information that we hold about you.
- Right of rectification  
You have the right to correct data that we hold about you that is inaccurate or incomplete.

- Right to be forgotten  
In certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing  
Where certain conditions apply, you have the right to restrict the processing of your personal data (as an alternative to erasure). This means we would be allowed to store the data, but not use it.
- Right of portability  
You have the right to have the data we hold about you transferred to another organisation.
- Right to object  
You have the right to object to certain types of processing. This includes an absolute right to prevent your personal data being used for direct marketing.
- Right to object to automated processing, including profiling  
You have the right not to be subject to decisions based solely on automated processing, including profiling, if this produces legal effects or similarly significantly affects you.

You can exercise any of the above rights by contacting us using the details shown in section 3 above.

In cases where we have shared your data with a third party (as explained in section 8 above) we may also share your request with that third party so that they can assist us in fulfilling it.

UK data protection law also gives you the following additional rights:

- Right to complain  
You have the right to lodge a complaint with us (as the data controller) or with a supervisory authority, as described in section 12 below.
- Right to judicial review  
You have the right to take legal action against a controller or processor where you consider that any of your rights have been infringed as a result of your personal data being processed in a way that does not comply with UK data protection law. You also have the right to take legal action against the supervisory authority if they do not handle your complaint in an appropriate or timely manner.

## 12. Complaints

In the event that you wish to make a complaint about how your personal data is being processed by us or by third parties as described in section 8 above, or about how a previous complaint has been handled, we would appreciate the opportunity to resolve your query in the first instance before you contact the ICO.

The details for each of these contacts are as follows:

Data Controller

Refer to section 3 above.

Supervisory Authority

Information Commissioner's Office (ICO)

Wycliffe House

Water Lane

Wilmslow

Cheshire SK9 5AF

[casework@ico.org.uk](mailto:casework@ico.org.uk)

<https://www.ico.org.uk>