

OOMPH!

PRIVACY POLICY

Version: 1.0

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DISCLOSURE STATEMENT

The information contained in this document, which is not in the public domain at the time of disclosure, is confidential to Oomph Wellness Limited and the client. It shall be treated as such by those persons employed or retained by the client.

The information shall only be used by the client for the purpose for which it was originally provided. Accordingly, the contents of this document shall not be disclosed in whole or in part to any other parties without prior written consent of Oomph Wellness Limited.

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INTRODUCTION

We are Oomph Wellness Limited. We're a company registered in England and Wales with company number 07608774, whose registered address is at 85 Great Portland Street, First Floor, London, England, W1W 7LT. In this privacy notice we will refer to ourselves as 'we', 'us' or 'our'.

You can get hold of us in any of the following ways:

1. by phoning us on 0203 601 6363.
2. by e-mailing us at support@oomph-wellness.org; or
3. by writing to us at 85 Great Portland Street, First Floor, London, England, W1W 7LT

You should read this privacy notice carefully so that you know and can understand why and how we use the personal information we collect and hold about you.

We have appointed Emily Wood as our Data Protection Officer. You can contact her at emilyw@oomph-wellness.org

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We may update this policy from time to time. This version was last updated on 20th January 2023.

1.0 REQUIREMENT FOR A RETENTION AND DISPOSAL POLICY

The purpose of this policy is to detail the procedures for the retention and disposal of information to ensure that we carry out this consistently and that we fully document any actions taken. Otherwise specified the retention and disposal policy refers to both soft and hard copy documents.

1.1 WHY IS IT REQUIRED BY A PURCHASING ORGANISATION?

The need for a retention and disposal policy may be determined by a purchasing organisation to establish our current processes and procedures (if any) with reference to the retention and disposal of their information in the use with Oomph Wellness Limited software.

2.0 DATA WE COLLECT, PROCESS AND RETAIN

The collection, use and retention of personal data flows throughout Oomph Wellness. We have several security measures in-place to minimise the risk of data being compromised. So, what data do we collect? How do we process it? How do we retain the data? How do we destroy it? And what security measures do we put in-place to protect customers data?

2.1 SENSITIVE PERSONAL DATA AND PERSONAL DATA

With our subscribing customers we do not hold any sensitive personal data for any user, organisation, or associate of the organisation. We do plan to hold sensitive personal data and personal data in relation to residents of organisations that subscribe to our services. Below is a list of the data we plan to hold.

SENSITIVE DATA HELD	PERSONAL DATA HELD
Racial and/or ethnic origin	Full Name
Health related data	Preferred First Name
	Photograph of Subject (Only if uploaded)
	Interests
	Hobbies
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Oomph Wellness does hold personal data for users and their organisations, below is a list of the data we hold.

PERSONAL DATA HELD	ORGANSATIONAL DATA HELD
Full name	Lead contact full name
Preferred name	Lead contact email address
Email address	Lead contact telephone number
Photograph of subject (if uploaded)	Organisations registered address
Employee number	Organisation's registration number
Employees start date	Finance contacts full name
Employee role	Finance contact email address
Employee's work location	Finance contact telephone number
Training data	Contractual Information
IP address	CQC Rating
	Size, configuration and set up of organisation
	Organisations trading name

2.2 HOW WE OBTAIN THE DATA

Oomph Wellness obtain the above sensitive personal data, personal data and organisational data in three ways, either through direct input by an authorised user into our web interface (software), through a spreadsheet via email from an employee of the organisation that is authorised to share this information with us or through an integration with a third-party system such as a HR system or Care Planning Software.

It is the employee's obligation to comply with the data protection act and GDPR when sharing this data with us.

We also collect data from website enquiries, trade events, telephone enquiries and invitation to tender requests.

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2.3 HOW WE STORE THE DATA WE COLLECT

Oomph Wellness Limited store all our data on our secure server located within the UK. We do not store data outside of the European Economic Area (EEA). We utilise a third-party hosting provider Firebase via an organisation called Vindico to provide us with a managed hosting service using AWS (Amazon Web Services).

Neither Firebase nor Vindico are authorised to access our data physically or virtually without prior consent from Oomph Wellness Limited. This consent can only be given by authorised personnel within Oomph Wellness Limited, namely Product and Operations Director and the Product Owner.

We store several copies of the personal data:

1 x copy within the live environment

1x copy within the development/staging platform

1 x daily back up

1 x weekly back up

1 x monthly back up

Access to the above is only available to authorised personnel of Oomph Wellness who have been provided permission on a need-to-know basis. Access to the live system is only provided by the purchasing organisations administrator giving access rights.

We also store customer contract details on cloud-based CRM that is password protected along with internal shared drive which again is password protected.

2.4 WHERE AND HOW DATA IS MOVED

Moving of personal data or the flow of information may take the following formats when using our system. Below are the routes for accessing and moving personal data within the systems.

Data transmitted from our server to clients is only undertaken with the use of HTTPS:

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FORMAT	WHEN WOULD THIS FORMAT BE USED
HTTPS	When accessing data via our web interface
SFTP	This is used to exchange data with a third-party HR or Care Planning Software
Accessing the server via SSH	Vindico developers have access via this route
Email	Oomph Wellness would email personal data only via HTTPS and would password protect any file
Export	By a customer's authorised user or by request from the customer to Oomph Wellness
Print	By a customer's authorised user or by request from the customer to Oomph Wellness

2.5 HOW WE DESTROY DATA

Data destruction refers to the erasure of data from a computer system. Oomph Wellness Limited will destroy live and data only upon entirely upon request or within 3 months of at contract termination with regards to the specific data set within the operating systems purchased. That said however, we will retain corporate data and information, contract details etc for a period of 6 years post contract termination.

We will also anonymise statistical data generated via the use of the system (resident and employee) and retain this information for no shorter than 6 years post contract termination.

Any data retained within the back-up schedule will be destroyed via the normal back-up schedule only and remain exempt from any request.

Data destruction can only take place after written authorisation from the customer or at the end of a contract term whereby the contract has not been renewed or it is scheduled within the disposal schedule.

The physical act of data destruction can only be undertaken by Vindico whereby they have been provided authority by Oomph Wellness by the Product and Operations Director of Product Owner.

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Oomph Wellness will destroy all copies of data and provide written confirmation that this task has been completed excluding the stated retained information data sets listed above.

2.6 HOW LONG DO WE KEEP DATA FOR?

Oomph Wellness Limited keeps data for the duration of the contract term or for up to 12 months after the organisations is set as a 'leaver', whichever is shortest.

Data should be kept for as long as they are needed to meet operational needs, together with legal and regulatory requirements. We have assessed our data to:

- Determine their value as a source of information about the purchasing organisation, its operations, relationships, and environment.
- Assess their importance as evidence of business activities and decisions.
- Establish whether there are any legal or regulatory retention requirements (including: public records act 1958, data protection act 1998, the freedom of information act 2000 and the limitation act 1980).

Where data records are likely to have a historical value, or are worthy of permanent preservation, we will transfer them to archive after 25 years.

3.0 DISPOSAL SCHEDULE

A disposal schedule is a key document on the management of data records and information. It is a list of a series or collections of records for which predetermined periods of retention have been agreed with the organisation.

Data records for disposal schedules will fall into three main categories:

- A. DESTROY AFTER AN AGREED PERIOD: Where the useful life of a series or collection of data records can be easily predetermined (for example, destroy after 3 years; destroy 2 years after the end of the financial year)
- B. AUTOMATICALLY SELECT FOR PERMANENT PRESERVATION: Where certain groups of records can be readily defined as worthy of permanent preservation and transferred to an archive.

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C. REVIEW: See 2 above

Destruction

- A. NON-SENSITIVE INFORMATION: Can be placed in a normal rubbish bin
- B. CONFIDENTIAL INFORMATION: Crosscut shredded
- C. ELECTRONIC EQUIPMENT CONTAINING INFORMATION: Destroyed using killdisc and for individual folders, they will be permanently deleted from the system.

Destruction of electronic records should render them non-recoverable even using data recovery techniques.

4.0 SHARING OF INFORMATION

Duplicate records should be destroyed. Where information has been regularly shared between business areas, only the original records should be retained in a secure password protected environment. Where the original records are physical these must be stored in a lockable environment.

Where we share information with other bodies, we will ensure that they have adequate procedures for records to ensure that the information is managed in accordance with the relevant legislation by the line manager.

5.0 AUDIT TRAIL

Documents disposed of within the schedule either by being disposed of earlier or kept for longer than listed will need to be recorded for audit purposes.

This will provide an audit trail for any inspections conducted by the Information Commissioner and will aid in addressing Freedom of Information requests, where we no longer hold the material.

6.0 MONITORING

Responsibility for monitoring the disposal policy rests with Product and Operations Director of Oomph Wellness Limited.

7.0 REVIEW

This policy should be reviewed every 3 years.

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8.0 DISPOSAL SCHEDULE – FINANCIAL MANAGEMENT

HEADING	DESCRIPTION	RETENTION PERIOD	PERSON RESPONSIBLE
Financial Management – bank, petty cash and creditors records	Paid/presented cheques and records of all cheques drawn for payment	6 Years	Finance Director
	All other cheque records – cheque books received butts, cancelled	2 Years	
	Bank statements and reconciliations	6 Years	
	Electronic banking – transactions, payment files, deposits, withdrawals, and audit trail	Same as paper records	
	All petty cash receipts	6 Years	
	Creditor's history records, lists and reports	6 Years	
	Statement of accounts	2 Years	
Financial Management – Ledger Records	General ledger produced for purposes of preparing certified financial statements	6 Years	Finance Director
	Creditor ledger	6 Years	
	Other ledgers and related audit trails	6 Years	
	Journals – prime record for raising charge	6 Years	
	Journals – adjustments	6 Years	
	Reconciliation's year end	6 Years	

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	Assets and depreciation registers	6 Years on the disposal of the last asset	
	Records in relation to capital works projects	6 Years	
	Annual and quarterly financial statements	6 Years	
	Periodic financial statements	Destroy when cumulated into quarterly/annual reports	
Financial Management – Purchase Orders	PO records	6 Years	Finance Director
Financial Management - Income	Debtors' records and invoices	6 Years	Finance Director
	Credit notes and refunds	6 Years	
	Records relating to unrecoverable revenue (bad debt)	6 Years minor / 10 years serious matters	
Financial Management – Payroll	Employees pay histories	6 Years – 3 Years for leavers	Finance Director
	Salary ledger card/record	6 Years	
	Copy of payroll sheets	6 Years	
Financial Management – Budgeting	Expenses and revenue returns	1 Year after the year to which the returns relate	Finance Director
	Annual reports	1 Year after publication	
	Grant funding/Tax rebates	6 Years after grant or rebate made	

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	Fraud and theft	6 Years Minor and 10 Years Serious	
Financial Management – Internal and External Audit	External audit investigations	6 Years after completion	Financial Director
	Audit report that includes long-term contracts	6 Years	
	Report papers used in course of fraud investigation	6 Years	
	Other audit reports	3 Years	
	Terms of reference, correspondence, minute of meetings, working papers	3 Years	
	Programmes, plans and strategies	1 Year after the date of the last plan	
Annual reports to accounting officers	3 Years		

9.0 DISPOSAL SCHEDULE – HUMAN RESOURCE RECORDS

HEADING	DESCRIPTION	RETENTION PERIOD	PERSON RESPONSIBLE
Employee Files and Board Member Files	Paper and Hard copy employee files	6 Years after the employee leaves the organisation	Head of HR
Income Tax Records and Wages	Income tax and NI returns	3 Years after the financial year in which they relate	Finance Director

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	Wages/salary records (also overtime, bonuses, expenses)	6 Years	Finance Director
	National minimum wage records	3 Years	Finance Director
Pension and Retirement	Retirement benefits schemes	6 Years	Head of HR
Policies		Until superseded	Policy Owner
Sickness Records	Statutory pay records and calculations	3 Years	Head of HR
Employee Files	Records relating to working time	2 Years from the date which they were made	Head of HR
	Accident books, accident records/reports	3 Years after the date of the last entry	

10.0 DISPOSAL SCHEDULE – CORPORATE GOVERNANCE

HEADING	DESCRIPTION	RETENTION PERIOD	PERSON RESPONSIBLE
Accommodation	Room bookings	1 Year	Chief Operating Officer
Annual Report	Final report	Permanently	Finance Director
	Background documentation and iterations of report	2 Years	
Board	Audited board papers	6 Years	Board Chairman
	Board minutes	Permanently	
	Terms of reference	Until superseded	
Corporate and Business Planning	Formal policies and documents	5 Years	Chief Executive Officer
Complaints	Register of complaints	10 Years	Board Chairman

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Contracts	Initial proposal	6 Years	Sales Director
	Agreed specification	6 Years	Sales Director
	Invitation to tender	6 Years	Sales Director
	Tendering - unsuccessful	1 Year	Sales Director
	Key terms agreement	2 Years for the end of the contract	Sales Director
	Invoices	6 Years	Finance Manager
	Credit notes	6 Years	Finance Manager
	Contract paperwork	6 Years	Sales Director
	Contract changes / amendments	6 Years	Sales Director
Forms and Templates		Until superseded	Document Owner
General Correspondence including Emails		2 Years	Account Manager
Information policy and Legislation	FOI requests	2 Years	Chief Operating Officer
	Disposal Schedule	Permanently	Chief Operating Officer
	Documents destroyed list	10 Years	Chief Operating Officer
	Employee training records	5 Years	Head of HR
Office Administration		5 Years	Document Owner
Records Management	Policies	Until superseded	Head of HR

11.0 DISPOSAL SCHEDULE – CUSTOMER DATA RECORDS

HEADING	DESCRIPTION	RETENTION PERIOD	PERSON RESPONSIBLE
Customer Contact Information	CRM Data	6 Years	Account Manager

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Data back Ups	Daily, Weekly, Monthly and Configuration	Until superseded	Product and Operations Director
Organisational Personal/Sensitive Data	Data in-use on the platform	Until Superseded or until contract end	Product and Operations Director

