

Benifex Privacy Notice

Official – Public

Version 1.5

For more information please contact:

Email Address: privacy@benifex.com

Printed documents or local copies will be classified as uncontrolled documents.

Document Control

Legal Disclaimer

This document and all the information contained in it is proprietary and confidential to Benifex. Benifex reserves all intellectual property rights in relation to the material included in this document. Accordingly, it must not be disclosed or otherwise revealed to outside parties without the prior written consent of Benifex.

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See end of document for change history

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Benifex Privacy Notice

1 Scope

This privacy notice aims to provide you with information on how Benifex collects and processes User personal data, in its capacity as a data controller, in relation to the specific products or services purchased from Benifex. Any reference within this privacy notice to 'customer' shall be read as a direct reference to your employer.

It is important that you read this privacy notice together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements other notices and privacy policies and is not intended to override them.

2 Privacy Notice

2.1 Who we are

When we refer to "Benifex" in this privacy notice, we are referring to the following companies within the Benifex Group:

- Benifex Limited (04768546), registered in England and Wales whose registered office is at Mountbatten House, Grosvenor Square, Southampton, Hampshire, SO15 2JU
- Benifex Financial Solutions Limited (06242658), registered in England and Wales whose registered office is at Mountbatten House, Grosvenor Square, Southampton, Hampshire, SO15 2JU
- Benifex Philippines Inc (2023070107567-05), registered in the Philippines whose registered office is at 17th Floor Skyrise 4B, West Geonzon St., Apas, Cebu City, Cebu
- Benifex Payments Limited (15029345), registered in England and Wales whose registered office is at Mountbatten House, Grosvenor Square, Southampton, Hampshire, SO15 2JU
- Affinity Financial Network U.K Limited (04428631), registered in England and Wales whose registered office is at Mountbatten House, Grosvenor Square, Southampton, England, SO15 2JU
- Affinity Financial Network Limited (322827), registered in Ireland whose registered office is at 3rd Floor, 1 Custom House Plaza, I.F.S.C., Dublin 1, Ireland, D01 C2C5
- Cloud 8 Limited (12179732), registered in England and Wales whose registered office is at Mountbatten House, Grosvenor Square, Southampton, Hampshire, SO15 2JU

This privacy notice is issued on behalf of the Benifex Group, so when we mention "Benifex", "we", "us", "our" in this privacy notice, we are referring to the relevant company in the Benifex Group responsible for processing your personal data. We will let the Customer know which entity will be the controller of the Customer's employees' personal data when the Customer purchases the software or service with us.

Please read this privacy notice carefully to understand our views and practices regarding your personal data and how we will treat it. Section 2.2 and 2.2.4 of this Privacy Notice confirms the types of personal data we shall process when providing the Services.

If you have any questions about this Privacy Notice, including any requests to exercise your legal rights, please contact us using the contact details set out in section 2.9 below.

We are registered with the relevant data protection authorities as follows:

Business	Registration Commission	Registration details	Registration date expiry	Benifex Data Protection Representative / DPO
Benifex Limited	ICO: Z8773454	Benifex, Third Floor, Mountbatten House, Grosvenor Square, Southampton, Hampshire, SO15 2JU	29/09/2025	Benifex: Head of Information Security DPO: Michael Griss Zellis General Counsel and DPO
Benifex Financial Solutions Limited	ICO: Z3103927		08/03/2026	
Affinity Financial Networks UK Limited	ICO: ZB053938		29/04/2026	
Cloud 8 Limited	ICO: ZA648003		25/03/2026	
Affinity Financial Network Limited	Irish DPC	3rd Floor, 1 Custom House Plaza, I.F.S.C. Dublin 1, Dublin, D01C2C5	Not registered	

2.2 What we collect and process and why

As part of providing our Services, we collect, use, store and transfer personal data so we can provide the Services. "Personal data" means any information about an individual from which that person can be identified.

Personal data is provided to us by our Customers (your employer) or directly by the users of our Services (the **Users**). For more information about the type of personal data processed please see the table below.

2.2.1 Types of Personal Data Collected

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

- **Identity Data** includes first name, last name, any previous names, username or similar identifier, marital status, title, profile photo, date of birth and gender.
- **Contact Data** includes delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, click tracking, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access the Services.
- **Profile Data** includes password, preferences, feedback, and survey responses.
- **Usage Data** includes information about how you interact with and use our Services.
- **Health Data** includes Absentee Information (please see section 2.2.4)
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

We also collect, use, and share aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' usage

data to calculate the percentage of users accessing a specific website feature to analyse general trends in how users are interacting with our website to help improve the website and our service offering.

Please also see section **2.2.4** below which sets out the special category personal data which may be processed by us when performing certain Services.

2.2.2 How we collect your personal data

We use different methods to collect data from and about you including through:

- Provided by our Customer (your employer) to enable us to deliver our Services.
- Your interactions with us. You may give us your personal data by filling in online forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - access / use our Services;
 - request marketing to be sent to you;
 - enter a competition, promotion, or survey; or
 - give us feedback or contact us.
- Automated technologies or interactions. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.
- Technical Data is collected from cookie analytics providers such as Hotjar.
- Contact, Financial and Transaction Data is collected by us and from providers of technical, payment and delivery services when you purchase the digital Gift Card product through the Discounts Module. Such providers may be based outside the UK.

2.2.3 How we use your personal data

Benifex processes the personal data to provide the Services to the Users. The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Performance of a contract** with you / the Customer (to which you are a beneficiary): Where we need to perform the contract we are about to enter into or have entered into with you / the Customer (to which you are beneficiary).
- **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.
- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter.

We have set out below, in a table format, a description of all the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Use	Type of data	Legal basis [and retention period]
To provide the Services to our Customer	(a) Identity (b) Contact (c) Profile (d) Usage (e) Technical (f) Health (g) Financial	Performance of a contract with the Customer (of which the User is a beneficiary of)
To provide the digital Gift Card product to you upon purchase through the Discounts Module.	(a) Identity (b) Contact (c) Financial	Performance of a contract with you upon purchase of the digital Gift Card product.
To manage our relationship with you which will include notifying you about changes to our terms or privacy notice	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and online advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)

Purpose/Use	Type of data	Legal basis [and retention period]
	(f) Technical	
To use data analytics to improve our website and Services, customer relationships and experiences and to measure the effectiveness of our communications and marketing	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To send you relevant marketing communications and make personalised suggestions and recommendations to you about goods or services that may be of interest to you based on your Profile Data	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to carry out direct marketing, develop our products/services and grow our business)
To enable you to provide feedback on our products and/or features of the Services to assist with our research and future development of products and/or features of the Services.	(a) Identity (b) Contact	Consent

Where we are required to collect personal data by law or under the terms of a contract we have with your employer, and you fail to provide that data when requested, we may not be able to perform the contract we have or provide the Services procured for your benefit by your employer. In this case, we may be unable to provide you with the Services, but we will notify you if this is the case at the time.

Where we collect personal data to gain feedback from you on the products and/or features of our Services we will get your consent before sending communications to you via email. Otherwise, generally, consent is not the sole legal basis for processing your personal data although we will get your consent before sending direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time in accordance with section 2.4 of this privacy notice.

2.2.4 Special categories of personal data

Due to the nature of the Services and the employee benefits which may be made available by the Customer to their employees, Benifex may receive and process special category personal data as set out below.

Health Data:

- Benefit providers providing insurance products may require the completion of a risk assessment by the Customer (and/or you) to enable the benefit provider to provide a notice quotation, the arrangement of such notice quotation forms part of our Broking and Consultancy Service.
- We provide the customer with claims administration and management assistance for health and risk insurance products brokered by us. As part of this Service, we will require the Customer (and/or you) to provide us with health data that is directly related to a specific claim (if relevant).

Wherever possible, Benifex encourages the customer (and/or you) to provide all special category personal data directly to the benefit provider / third party requesting access to it. We do not collect any information about Users' criminal convictions and offences.

2.2.5 Profiling

Benifex does conduct limited automated profiling in relation to our Wellbeing products. This involves an online health related checklist which asks the end user to answer "yes or no" to various health questions, to enable us to assess the End User criteria and to provide specific targeted guidance for health and wellbeing services.

2.2.6 Automated technologies

For security purposes all our software applications will automatically log and store access and device information to assist us in investigating should an incident occur. Our software applications also use cookie management tools, providing the User with control of what analytical cookies are available to Benifex. As with all software applications, some cookies are necessary for the operation of the applications and services.

2.2.7 Data Analytics

Benifex uses data analytics to provide relevant benefits data to its customers and we will also use it ourselves to aid with the improvement of our Services. This excludes the Benifex Gateway platform, which does not use data analytics.

Benifex will collect, aggregate, anonymise, use and share such data to demonstrate (on a statistical basis) the how the Services are used and by which demographics (**Analytics Data**). Analytics Data could be derived from Personal Data, but **the data will be fully anonymised and so will not directly or indirectly reveal any User's identity**. For example, we may aggregate and anonymise your usage data to calculate the percentage of Users accessing a specific application feature or benefit selection.

If we were to combine or connect the Analytics Data with any Personal Data, so that it can directly or indirectly identify any User, we would treat the combined data as Personal Data and use it only in accordance with this privacy notice.

2.3 Consent

As part of the Services, Benifex may provide the User with the option of subscribing to newsletters, feedback forms or alerts regarding the Services. Consent is the lawful basis that Benifex relies on when processing the Personal Data provided by a User during the sign-up process and to provide feedback to Benifex to assist with our research and future development of the products and/or features of the Services, in accordance with Article 6(1)(b) of the DPA.

2.3.1 Withdrawal of consent

The Users may, in accordance with Article 7(3) of the DPA, withdraw their consent to receive any marketing communication directed to them via the Discounts and Cashback service by (i) using the supplied unsubscribe links on the communications received or (ii) updating their email notifications in their application profile. Withdrawal of consent from any other service will have to be directed to the individual's employer as it may affect services offered under their contract of employment.

2.4 Disclosure of personal data

2.4.1 Third Parties:

Benifex may share your personal data with the third parties where necessary for us to provide the Services. These third parties are set out below:

- members of Benifex's Group;
- benefit providers (i.e. medical insurers, life insurers and pension providers where we are providing Broking services);
- discount providers (where we are providing Discount & Cashback services);

- third parties who may supply prizes or run competitions on the Discounts & Cashback and Wellbeing websites; and
- third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

2.5 Where does your data reside?

All personal data related to OneHub and broking services processed by Benifex will reside within the UK and European Economic Area (**EEA**) unless otherwise agreed with your employer/our Customer. Benifex data processing is conducted within our Google Cloud Platform, located in London, Belgium, and (at a Customer's request) Singapore.

For Benifex Gateway customers only, all data processing is conducted within Amazon Web Services located in London.

If the third parties mentioned above are based internationally (outside of the UK and EEA) and are required to process the personal data to provide services to Benifex, Benifex shall ensure that adequate safeguards, such as EU Standard Contractual Clauses (SCC) or the UK International Data Transfer Agreements (ITDA), have been implemented between Benifex and the third party to ensure the security and privacy of your personal data.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

2.6 Security of your data

Benifex protects your personal data in accordance with data protection law. Benifex will encrypt at rest and in transit all data stored within its infrastructure and will ensure that only authorised personnel will have access to such data. Benifex conduct regular tests of the infrastructure and applications to ensure they remain secure.

In accordance with the Applicable Privacy Legislation, Benifex maintains a security framework under Article 32 "Security of processing". Benifex are certified to ISO 27001 (Information Security Management System) standards and use the associated security controls for ISO 27001 Annex "A", ISO 27017 (Code of practice for information security controls including those associated with access to cloud services) and ISO 27018 (code of practice for protection of Personally Identifiable Information (PII) in public clouds acting as a PII processor). Additionally, we hold the Cyber Essentials Scheme certification from the Information Assurance for Small and Medium Enterprises Consortium (IASME) formerly issued by CESG (Communications-Electronics Security Group).

2.7 Retention Period

We will only retain your personal data for as long as is reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with your employer.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In general, we maintain your personal data for a period of 7 years or period of the contract, whichever comes first; except for Financial Data which we maintain for 14 days (after which it is automatically deleted)

In some circumstances you may ask us to delete your data: see section 2.9 below.

Where we anonymise your personal data for statistical purposes, we may use this information indefinitely without further notice to you.

2.8 Your rights as a data subject

While Benifex process your personal data, you as the data subject have the following rights:

- **Right of access** – you have the right to request a copy of the information that we hold about you as the data controller. Please see section 2.10 for the process to follow.
- **Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete, though we may need to verify the accuracy of the new data you provide to us.
- **Right of erasure** – in certain circumstances you can ask for the data we hold about you to be erased from our records. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Right to restriction of processing** – where certain conditions apply to have a right to restrict the processing in one of the following scenarios:
 - if you want us to establish the data's accuracy; ◦ where our use of the data is unlawful but you do not want us to erase it;
 - where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Right of portability** – you have the right to have the data we hold about you transferred to another organisation. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Right to object** – where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- **Right to object to automated processing, including profiling** – you also have the right to object to be subject to the legal effects of automated processing or profiling.
- **Right to judicial review** - if Benifex refuses your request under rights of access, we will provide you with an explanation for our refusal. You then have the right to complain as outlined in clause 2.11 below.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

If you wish to exercise any of the rights set out above, please contact us via our contact details set out in section 2.9 below.

2.9 Subject Access Request

If you have provided personal data directly to Benifex, you are entitled to understand what data Benifex are processing and why. If you wish to submit a Subject Access Request (**SAR**), please contact the Benifex Data Protection Officer at the following address to request a SAR application form. The SAR application form is required to understand your query and to assist us in verifying your identity. Once completed, please send the SAR application form to:

- Data Protection Officer, Benifex Limited, Mountbatten House, Grosvenor Square, Southampton, Hampshire, SO15 2JU; or
- Via email to dpo@zellis.com

Benifex shall comply with a Subject Access Request without undue delay and at the latest within one month of receiving the request. Benifex may extend the time to respond by a further two months if the request is complex or if we have received multiple requests from a single individual. Benifex will notify the data subject if an extension is required.

2.10 Complaints

If you wish to make a complaint about how your personal data is being processed or how your complaint has been handled, you have the right to submit a complaint directly to Benifex and/or the relevant supervisory authority. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

You can also contact the UK and Republic of Ireland data protection authorities via their respective websites.

- UK - Information Commissioners Office (ICO) - <https://ico.org.uk/>
- Ireland – Data Protection Commission (DPC) - <https://www.dataprotection.ie>

Change History

Version	Date	Updated / Reviewed By	Page(s)	Section(s)	Description of Update
1.0	25/05/2023	Chris Wright Zak Proffitt Zuzana Blazkova	All	All	New document
1.1	04/06/2024	Chris Wright Zak Proffitt Sal Cilenti	All	All	Multiple sections have been reviewed, updated and / or removed.
1.2	11/11/2024	Natasha Lyons Louis Iveson	8, 9	2.2.7, 2.6	Benifex Gateway updates
1.3	05/08/2025	Simon Backwell	All	All	Updated Benefex to Benifex, updated branding, amended formatting, updated companies within Benifex Group and table of registration with authorities.
1.4	18/08/2025	Hannah Bhakar Zak Proffitt	All	All	Gift Card updates
1.5	11/09/2025	Hannah Bhakar Zak Proffitt	7, 8, 9	2.2.3, 2.3	Feedback consent updates
1.6	13/07/2026	Zak Proffitt	12	2.9	Updated email address for DSAR.