

PRIVACY POLICY

Introduction

This Privacy Policy sets out how chnnl (**we, us, our**) will collect, use, disclose and protect any **Personal Information** you may provide to us through your use of the App. **Personal Information** is any information that makes you, or any other individual, identifiable. We may update or replace this Privacy Policy from time to time however will notify you of any material changes in the way we deal with Personal Information by sending a notification via our App prior to the change becoming effective. The most recent version of this Privacy Policy is available at www.chnnl.app/privacypolicy and also on the App.

chnnl collects a range of information and data to assist us to provide certain **Services** to the organisation that has authorised your use of the App. **Services** we provide include:

- Collecting data submitted through the App by your organisation's employees and contractors (**Workers**)
- Using this data to measure, predict and support individual wellbeing
- Providing a safe space for Workers to express and record their feelings
- Collating, anonymising and aggregating Worker data, and making this available to your organisation for the purpose of surveying the psychological safety of employees, identifying areas of risk, recommending appropriate interventions, and facilitating Worker access to appropriate supports

Information we collect

The nature of the Service requires that individuals using the App disclose to chnnl information that may include Personal Information. Personal Information will be anonymised and/or aggregated by chnnl prior to chnnl making this information available to your organisation with their employer.

We only collect information that is reasonably necessary for the purpose of providing the Services, and required for compliance with our legal obligations.

The Information we collect or hold about you may include:

- Your mobile number, for the purpose of creating and authenticating your account
- Your name, for the purpose of creating and personalising your account. If you do not wish to provide your full name you are welcome to use a pseudonym, provided the name you use is not the same or substantially similar to the name of any other individual within your organisation
- Organisation and group/department affiliation, for the purpose of assessing reporting wellbeing trends and performing statistical analysis, and so that we may provide you with tailored support, plus information and updates from your organisation
- Any other Information that you provide in the course of using the App, including but not limited to survey responses, all journal entries, chatbot history and other entered information
- Information supplied by you in relation to any customer service query or issues
- Device information that relates to features used, device identifier, IP address, general location information, and information about the operating system from which you accessed our Service

Optional information you choose to provide to us, which may include:

- Email address, where you choose to opt in to receive updates about new features
- Demographic information such as your age range, gender, ethnicity,
(Please note: It is not possible for your organization to link your individual responses to any demographic information)

In the event information is provided through the App that makes an individual identifiable, we will remove and/or anonymise that information from the data we provide to your organisation.

Cookies

We use cookies and similar technologies across our Website and Apps. Cookies and similar technologies are small pieces of data that are stored on your device when you visit a website or use an App, enabling you to be identified when you return to that website or App in the future. This software allows us to collect information across different devices and across different sessions, to avoid having to resubmit information each time you log on. They also help us perform analytics and customise your experience with us.

We also use cookies and similar technologies set by other parties across our Websites and Apps. This allows us to provide third party features or functionality, such as interactive content and analytics. Third parties that set these cookies and similar technologies can recognise your device both when it uses our services and also when it visits certain other websites.

You can choose whether or not you want to accept cookies and similar technologies by changing the settings on your device. However, if you choose to disable them, you may not be able to use some parts of our Service.

How we use your information

We understand the importance of using your Personal Information in a responsible and secure manner. chnnl will use your Personal Information only to:

- perform and provide the Services
- identify you when you register and login to your account
- better understand the needs of our users, in order to improve the services we provide to you
- to respond to communications from you, including complaints and queries
- to analyse trends, conduct research and statistical analysis (on an anonymised basis)
- to protect and/or enforce our legal rights and interests, including defending any claim
- to keep the Service safe and secure
- to keep you informed about the Service, features and updates we think you may find useful
- for any other purpose authorised by you

In using the App you authorise chnnl to aggregate and anonymise Personal Information that you provide to us and to make this available to your organisation.

Disclosing your information

We will never share your personally identifiable data with third parties, unless:

- There is a serious risk to your own safety, or to the safety of another individual, and we consider that disclosure is necessary to prevent or lessen that risk.
- If required by law - in particular if there is a need for law enforcement authorities to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person.

In the event that we are able to offer additional services that make direct use of your non-personally identified data with third parties then this will only ever be through opt-in, and we will only ever share aggregates or themes on data you have supplied.

Protecting your Personal Information

The security of your Personal Information is important to us. We seek to protect your data with all reasonable technical and process controls to ensure unauthorised access and disclosure of your information does not occur.

chnnl is a New Zealand company with its head-office located in Auckland, New Zealand however your data will be held by Amazon Web Services (**AWS**) in Sydney. We may also store your data temporarily or permanently within New Zealand.

While we take reasonable steps to maintain secure internet connections between your device and our platform, it is your responsibility to maintain security of the device(s) and networks through which you access and use the App. There are inherent risks in using the internet, and if you provide us with Personal Information over the internet you do so at your own risk. If you follow a link on the App to another site, the operator of that site will have its own privacy policy and we recommend you review that site's privacy policy prior to providing any Personal Information.

Accessing and correcting your personal information

If you would like to review, correct, or update personal data that you have previously disclosed to us, you may do so by signing in to your account in the app or by contacting us directly at privacy@chnnl.app

How long do we keep your information?

We will only retain your information for as long as is reasonably necessary to fulfil the purposes we collected it for, including to satisfy any legal or statutory requirements.

In particular, we will retain your information:

- For as long as you have an account with chnnl
- For as long as the organisation that enabled your access remains a client of chnnl; for the integrity of company reporting purposes both current and historical

Following termination of your account, we will remove/anonymise all of your personal information, however we may choose to retain supplied data in an aggregated and anonymised manner indefinitely for research and product development purposes.

Contacting us

If you have any questions about this Privacy Policy, our privacy practices, or if you would like to request access to, or correction of, your Personal Information, you can contact us at privacy@chnnl.app