

Privacy Notice

1. Who we are

WELLINGTON CONSULTING SRL is a company that develops, markets and delivers educational electronic content to its customers.

2. What personal data do we process

WELLINGTON CONSULTING SRL is a personal data controller. We collect and process the following categories of personal data:

- Name, surname
- Employee ID
- User ID
- Email address
- Avatar
- Number of steps
- Distance
- Calories spent
- Challenge map
- Activity history
- Personal challenges
- Team
- Earned badges
- Google Account/ Apple ID

3. Why do we need them

We need your personal data to provide you with the following services:

On the legal basis of fulfilling our contractual obligations:

Creation of account and delivery of services:

- Name, surname – we use this data to communicate with you and identify you as an employee of one of our customers.
- Employee ID – we use this data to identify you as an employee of one of our customers.
- User ID – each user has a unique ID in the platform.
- Email address – we use this data to communicate with you and to create your account.
- Number of steps – we will download this data from your health app (Google Fit or Apple Health) in order to calculate all the indicators in the application. If you don't allow us to access this data, we won't be able to generate any indicator in the application.

- Google Account or Apple ID – we need this data to be able to connect to your Google Fit or Apple Health applications, to download the recorded number of steps.
- Distance, calories spent – this data is generated by the number of steps you take every day.
- Challenge map – this is a map of your challenges.
- Activity history – you can check the history of your activities anytime, in your account.
- Personal challenges – you can setup personal challenges, in your account.
- Team – you can invite your colleagues in your team and create team challenges.
- Earned badges – based on your activities, you will receive badges.

Based on your explicit consent:

AI analysis of voice and voice sample-based sound generation

- Avatar – you can customize your avatar in your application.

Based on our legitimate interest to protect our platform

App behaviour

- Logon/Logoff History – we will monitor your logon and logoff history in the application, to make sure we detect suspicious behaviour, in order to protect our platform and your data as well.

4. What we do with them

Your personal data is processed within WELLINGTON CONSULTING SRL company located in Romania. Hosting and storing your data take place at H88 Web Hosting, in Romania, which acts as a Data Processor for us.

Your personal data might be accessed by Fast Soft Developers, a company located in Romania that provides maintenance services for WELLINGTON CONSULTING SRL, acting as a Data Processor for us.

To provide the push message service, your personal data will be processed by Google Firebase service offered by Google, which is located in the United States. The compliance mechanism used for international transfer is [Google's Standard Contractual Clauses](#).

We will not share your activities' details with your employer. We will only provide aggregated usage reports for the platform, eliminating all personal data from them.

We will not feed any data into your Google Fit or Apple Health applications. The only personal data we will extract from your Google Fit/ Apple Health applications is related to the number of steps recorded by the applications.

5. How long do we keep personal data

We will keep the account data in the platform for the duration of our contract with your employer, for the duration of your contract with your employer, or till you request us to delete your personal data.

Your account data will be retained for three years since your last login on the platform under the legitimate interest of WELLINGTON CONSULTING SRL to maintain your account in case of inactivity.

Personal Data from the logs will be kept for six months.

6. What are your rights?

If you have reason to believe that any personal data that we have about you is incorrect or incomplete, you have the right to ask to see your personal data, to correct it, to request to be deleted, to request restriction of processing or to object to the processing. You also have the right to data portability. To exercise these rights please contact us at contact@wellington.ro.

If you want to file a complaint about how we process your personal data, please contact us at contact@wellington.ro. We will contact you to solve the problem raised.

You can also contact the Romanian National Supervisory Authority for the processing of personal data at www.dataprotection.ro and you can file a complaint.