

Information Security & Data Privacy Resource Hub



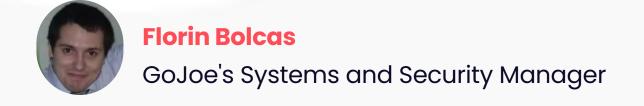
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# Section 1. Commitment to Data Security



At GoJoe, we prioritise the security and privacy of our users' data above all. Registered with the Information Commissioners Office (ICO) and strictly adhering to rigorous data protection laws and best practices, we set the standard for data security. Our use of world-class infrastructure, coupled with strategic collaborations with leading global security firms, exemplifies our commitment to handling client and user data with unparalleled care and the highest level of security.









## Section 2. What is GoJoe?



## The #1 digital health & fitness app for work and play

Welcome to GoJoe, a world-class digital health and fitness app designed to socialize individual health and fitness. Our platform brings together the best of technology, wellness, and community engagement to empower individuals and corporate teams in their health journeys.

**Trusted by....** 



amazon



ROYCE

**PayPal** 







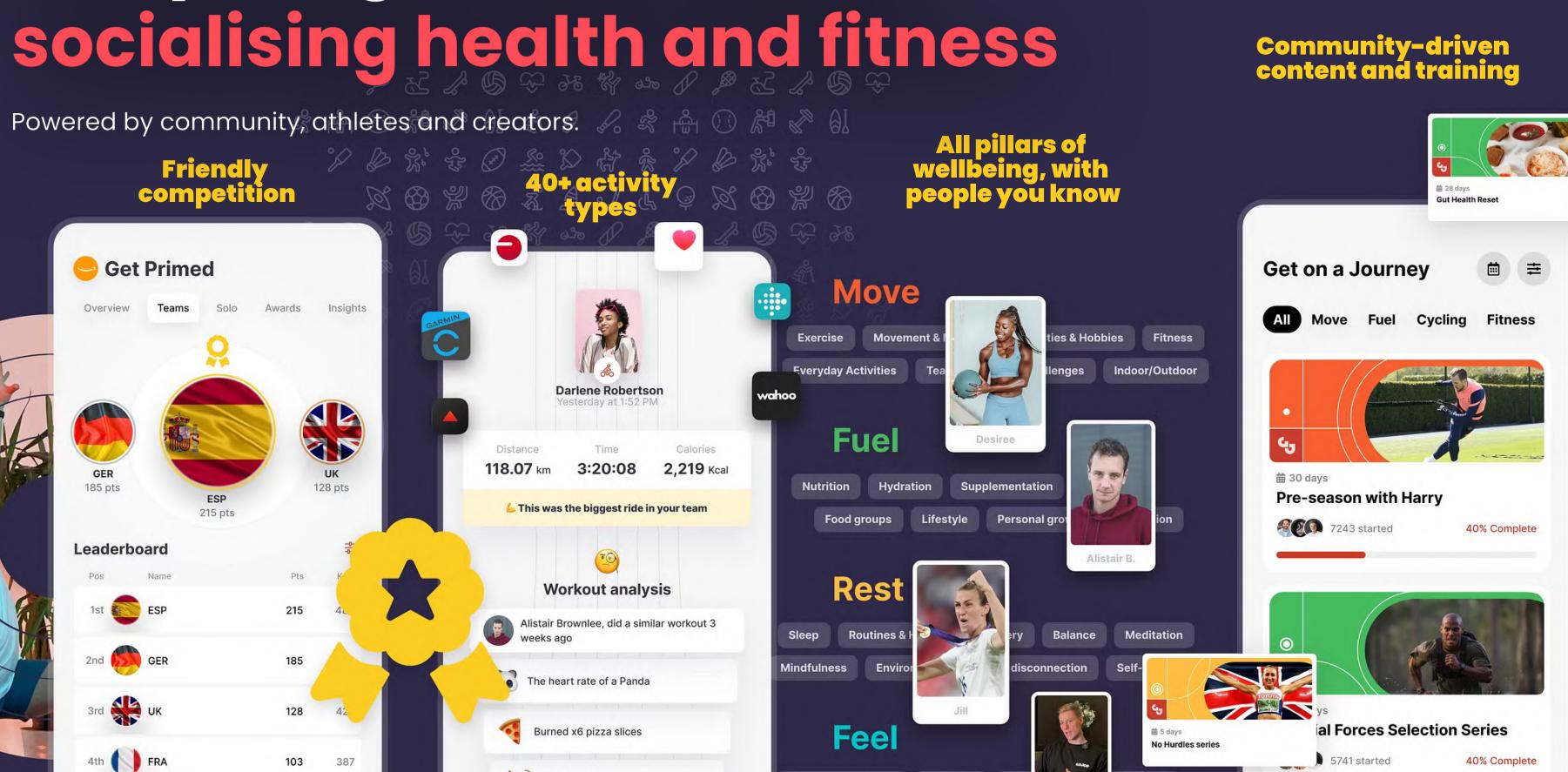






## Everything we do is about

Wild cat pace



**Emotions** 

**Stress Management** 

Lone

### You're in good company

**Meet our clients** 

Our clients range from companies with 20 employees to global brands with 240,000 staff.

Not on the High Street said:-

"GoJoe is the best thing we have ever done."



























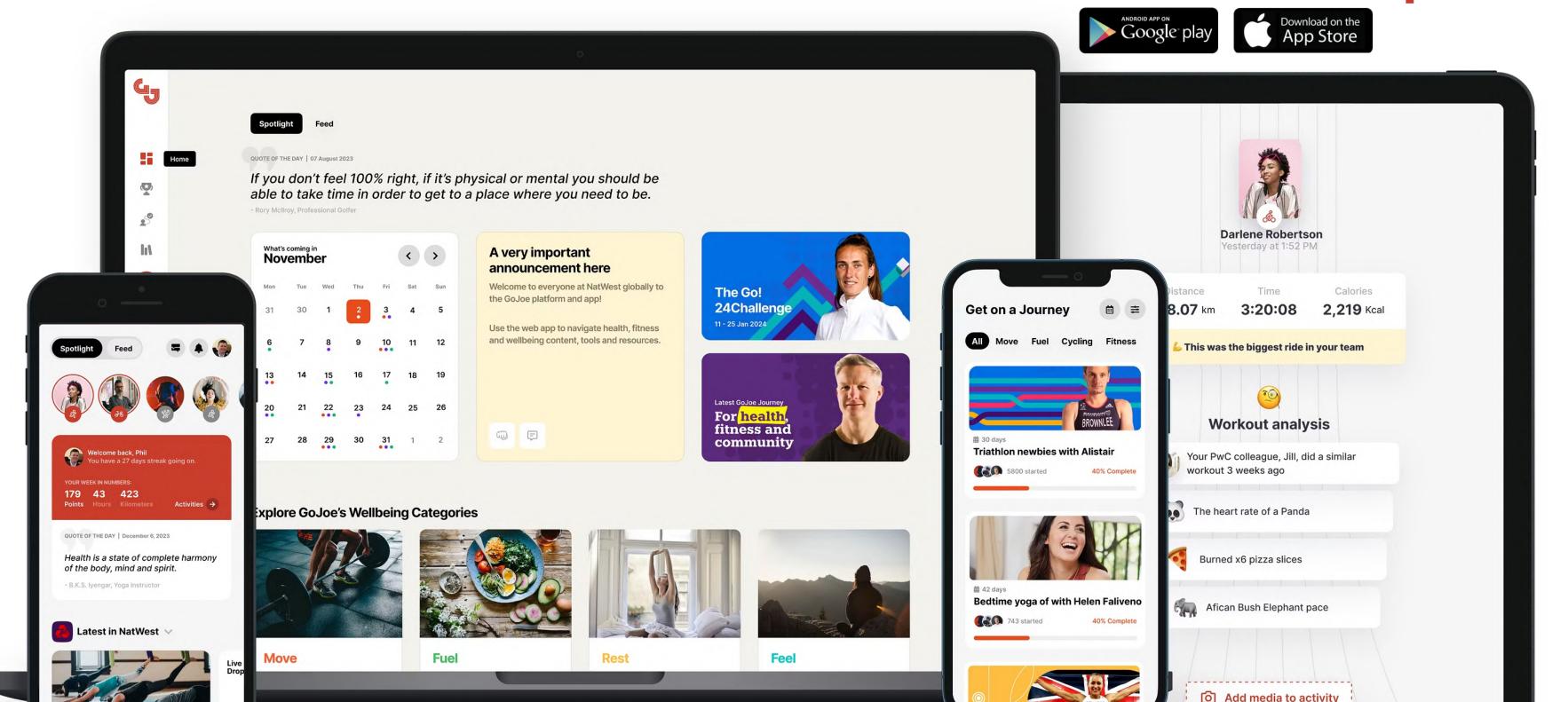






### Easy to use and accessible globally

#### Mobile | Tablet | Desktop



### Don't just take our word for it

Handing the mic pto a couple of GoJoe clients for first-hand accounts of how we've innovated and partnered together over the last few years to support their global workforces' wellbeing...

"We appointed GoJoe as Heineken's digital fitness partner and kicked things off in support of a charity fundraiser which raised over £69,000 for the Marmalade

Trust. The Heineken staff worked up quite the thirst during the opener, burning a mind-boggling 1,930,131 calories.

Great to see so many workouts being added – from handcycling to gym sessions!"



"We've joined forces with GoJoe to support over 33 teams across Europe. Our Amazonians absolutely love it."

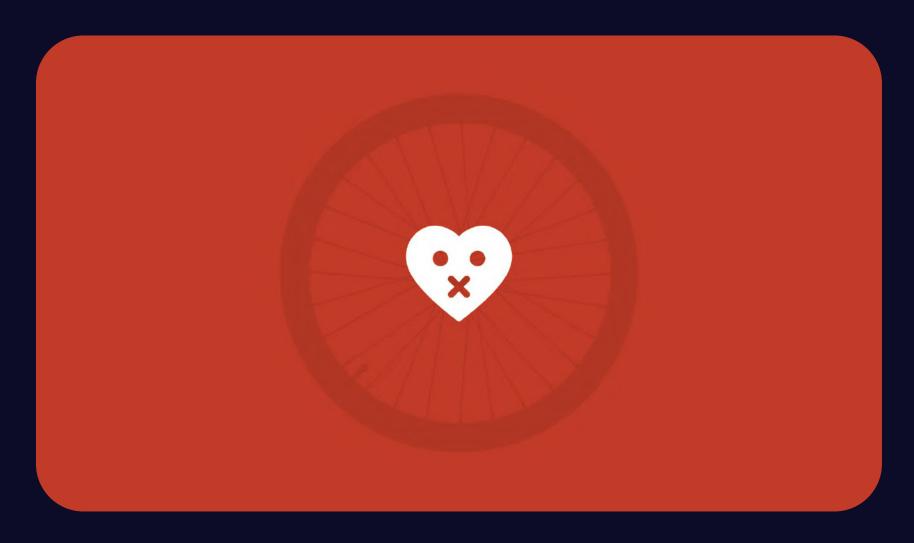


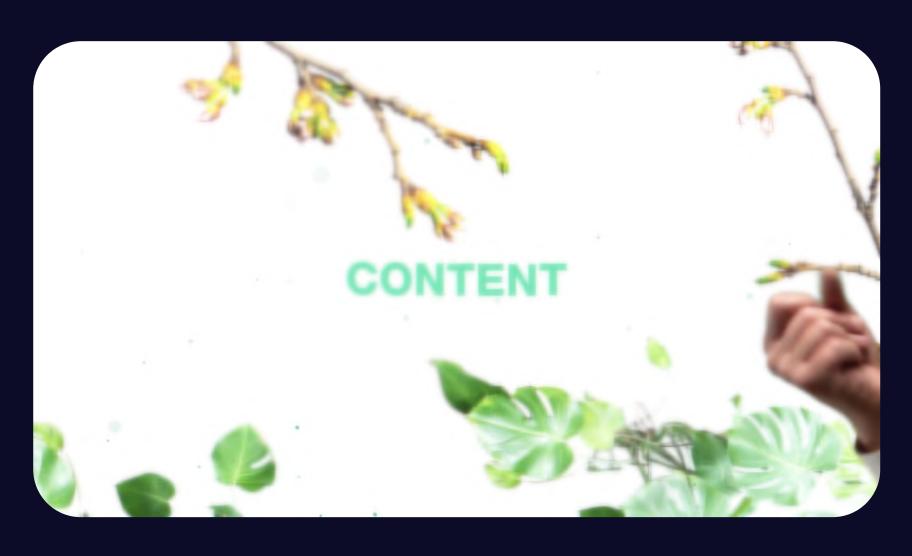
"For the last two years, we have partnered with GoJoe to run our annual 'Active for Change' wellbeing activation. This global initiative encourages physical activity among our diverse workforce, while also driving awareness and critical funds for our charity partner, The Washing Machine Project. This platform has not only improved the well-being of our staff, but it has enabled us to help The Washing Machine Project to make a meaningful impact on the lives of low-income and displaced families and communities worldwide. GoJoe's user-friendly and intuitive app has been a game changer, allowing us to effortlessly engage with our global workforce and their recent addition of language capabilities has further enhanced our ability to connect with our employees all over the world. The GoJoe team has consistently demonstrated their commitment to our cause, making it a pleasure to work with them. They have been exceptionally helpful, ensuring we achieve the best possible results from the challenge. Thanks to our partnership with GoJoe, we've successfully united our global workforce for a common purpose, making a meaningful impact worldwide."



### Learn more about GoJoe

(our products in 2 minutes)









## Section 3. Privacy By Design



#### GoJoe's Dual Contract Model

GoJoe employs a B2B2C model, which essentially means we engage in two distinct but interconnected contractual relationships – one with our corporate clients, i.e. you (to provide our wellbeing service to your organization) and the other with the end-users, who are typically the employees of or otherwise connected to the client organizations and who benefit from GoJoe's wellbeing service. This model allows GoJoe to maintain a high standard of compliance and operational integrity. It ensures that while we provide tailored wellbeing services to organizations, the privacy and data security of individual end-users are always upheld as per our stringent standards.

In other words, we don't shy away from our information security and privacy obligations to either you or the end users.

### Our Contract with You (the Employer)

- Under this contract, GoJoe commits to delivering a comprehensive wellbeing service tailored to the needs of your workforce.
- Crucially, this aspect of our service does not require GoJoe to obtain any employee data from you, meaning it's easy and simple to launch.

### Our Terms with Users (the Staff)

- The second part involves direct agreements with the endusers – typically the employees.
- These users opt into our services and agree to our terms of service and privacy policy. This direct engagement is vital as it positions GoJoe as both the data controller and processor.
- This is similar to how users engage with apps like Headspace.

<u>Terms of Use</u>

**Privacy Policy** 

Workplace Terms & Conditions

### Privacy by Design

The dual contract model enables GoJoe to hold itself to the highest standards in respect of data protection, information security

<b>+</b>	No data needs to be shared from you (the employer) to GoJoe	<b>+</b>	GoJoe acts as data controller and processor
+	GoJoe doesn't need to connect to your systems	+	Monitored by Drata (world-leading compliance provider) to ISO27001 standard
+	Participation is voluntary - users (staff) opt in and can opt out at any time	+	GDPR compliant
<b>+</b>	Data is never sold	+	ICO Registered
+	World-class Amazon Web Services (AWS) infrastructure is used	+	Penetration tested

#### **Contract** (Employer Client and GoJoe) User **Account Creation (Employer)** Onboarding **User Invitation Business Manager upload** Single-Sign On (SSO) **Client Invite & Code** (Optional) (Default) (Optional) Client uploads work email addresses GoJoe generates email for Employer Employer Client creates audience of employees to GoJoe Business Client to send to its own audience. client-side via identity provider. No Manager, generating an email Users follow the sign-up instructions personal data shared by Client to invitation from GoJoe to User. User and insert a code which unlocks the GoJoe. Invite sent by Client to may opt-in or ignore invitation. audience by email or intranet. Users Employer Client area on GoJoe. Users may opt-in or ignore invitation. may opt-in or ignore invitation. Email sent from GoJoe side (Customer.io) with invitation to Users to Employer area **User onboarding** on GoJoe.

#### **End User Terms** (Employer Client and GoJoe)

- User (staff member or participant) elects to download GoJoe application to mobile or otherwise accesses the service via GoJoe's web-app.
- User agrees to GoJoe's standard disclaimer, as well as the <u>terms and conditions of use</u> and the GoJoe <u>privacy policy</u>. These documents set out the way in which personal data is processed and managed by GoJoe, and details the data measures in place and ways in which users' personal data is processed, managed and/or disclosed The relationship here exists as between GoJoe and the end users.
- The data collected by GoJoe via onboarding is Name and Email Address (mandatory for GoJoe to provide the service), as well as date of birth, fitness level, age, weight, and height (optional). Participants can log in via email, Facebook, Google, Apple or SSO. For security, GoJoe does not ask for or store passwords.
- Following onboarding, if logging in via social, participants input a code to join their Employer community area. If SSO login is selected, the user is automatically joined into their Employer environment.



## User Data Sharing with GoJoe

GoJoe's approach to user data is rooted in transparency and control. Here's how we differentiate between mandatory and optional data, and our commitment to privacy.

#### **Mandatory Data**

 Account Creation Essentials: To access GoJoe services, users must provide their name and email address. This is essential for account setup and personalized management.

#### **Data Privacy & Security Facts**

We never collect and share special category data. Location data, such as maps from activities, is also never visible to other users. All data is processed and displayed with user consent via our Privacy Policy. Users can optout and request deletion of their data at any time, reflecting our commitment to data autonomy and privacy.

#### **Optional Data**

- Personalization Data: Users have the option to share additional personal details like date of birth, fitness level, weight, and height for a customized experience. This is entirely voluntary.
- Fitness and Health Metrics: With explicit consent, users can sync fitness data from a GPS tracker or wearables.
   This includes workout details and health metrics but excludes any special category data.
- Preference and Interaction Insights: User preferences
  within the app and engagement data help tailor the
  GoJoe experience. This includes favourite activities and
  challenge participation.

## Section 4. Robust Technical Infrastructure



### World-Class Infrastructure

GoJoe's technical infrastructure is the foundation of our secure and reliable service.

- Amazon Web Services (AWS): Utilizing AWS for its robust security and reliability, our data is stored in secure data centers in Ireland, aligning with European data protection standards.
- Continuous Monitoring and Updates: Our infrastructure undergoes constant monitoring and updates, ensuring resilience against evolving cyber threats.
- **Scalable and Flexible**: AWS's scalable architecture ensures consistent performance and adaptability to user demands.
- **Data Integrity and Recovery**: We maintain rigorous data backup and disaster recovery protocols, safeguarding data integrity.
- **Secure and Efficient**: Our commitment to a strong technical foundation guarantees a secure and efficient experience for all GoJoe users.

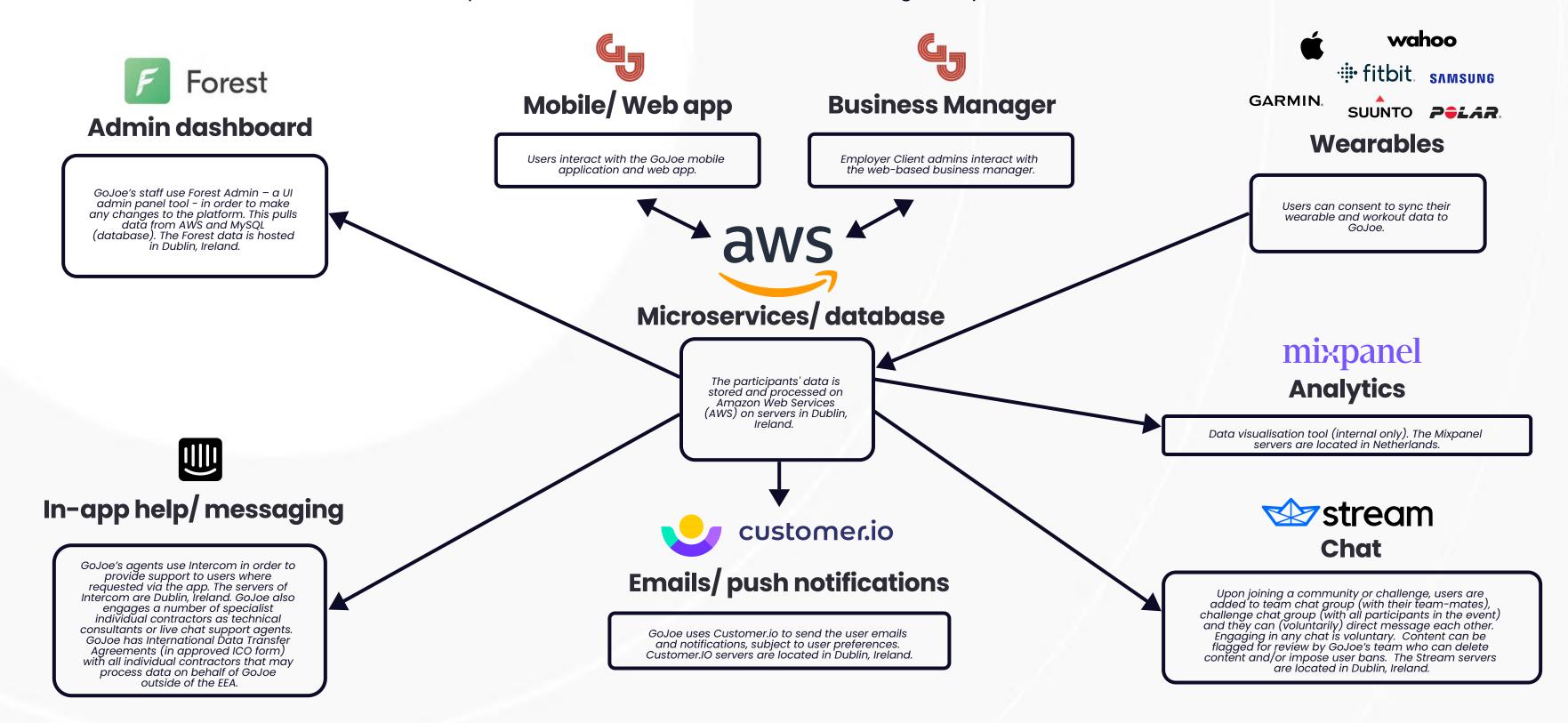


# Section 5. World-Class Third-Party Services



### Data flow map

This Data Flow Map provides an overview of GoJoe's third-party service providers, all of whom are industry-standard and world-class. It also illustrates how and where user data is processed and stored across our secure, globally distributed network.



# Section 6. Continuous Security Monitoring



### We monitor in real-time

GoJoe's partnership with Drata underscores our commitment to top-tier security and compliance.

- **Role of Drata:** Drata's advanced platform continuously monitors and verifies our security controls, aligning with ISO 27001 standards.
- Real-Time Monitoring and Compliance: We leverage Drata for real-time security monitoring and streamlined compliance workflows, ensuring audit readiness.
- **Employee and System Security:** Drata also helps monitor employee adherence to our stringent security policies, adding a robust layer to our internal security measures.



# Section 7. Rigorous Security Screening



### Making security more certain

At GoJoe, we recognize that robust security starts with our team. Our rigorous employee and contractor screening process is a cornerstone of our internal security strategy.

- Comprehensive Screening Process: Every employee and contractor at GoJoe undergoes a thorough screening process. This includes extensive background checks to ensure they meet our high standards for security and integrity.
- **Partnership with Certn:** In partnership with Certn, a leader in background screening and risk management, we are able to conduct in-depth and efficient checks. Certn's innovative approach allows us to quickly and accurately assess the trustworthiness and professionalism of potential team members.
- Ongoing Monitoring and Training: Our commitment to security extends beyond initial hiring. Through Drata and our in-house information security team we continuously monitor and provide regular training to our staff, ensuring they remain updated on the latest security practices and compliance requirements.
- **Ensuring a Secure Workforce:** This comprehensive approach to employee screening and training ensures that our team is not only skilled but also deeply understands the importance of data security and user privacy in every aspect of their work.



# Section 8. User Data Management



## Efficient User Data Management and Compliance

GoJoe's user data management balances stringent security with legal compliance, providing peace of mind for both individual users and corporate clients.

- Direct User Relationship: Users directly engage with GoJoe, accepting our <u>Terms</u> and <u>Privacy Policy</u>, making us both data controller and processor.
- Mitigating Corporate Client Risks: This direct user engagement alleviates legal data responsibilities for our corporate clients, ensuring a straightforward compliance process.
- Independent Data Management: GoJoe does not require employee data from corporate clients, as users independently provide their information directly to us.
- SSO and Secure Authentication Options: We offer secure sign-in options, including email with multi-factor authentication, and Single Sign-On (SSO) integrations for corporate users through our partnership with Okta, a leading identity management service, ensuring streamlined and secure access for all users.
- **User Data Control and Rights:** Users have complete control over their data with options to opt-out or request data deletion, in line with our strong commitment to data privacy.

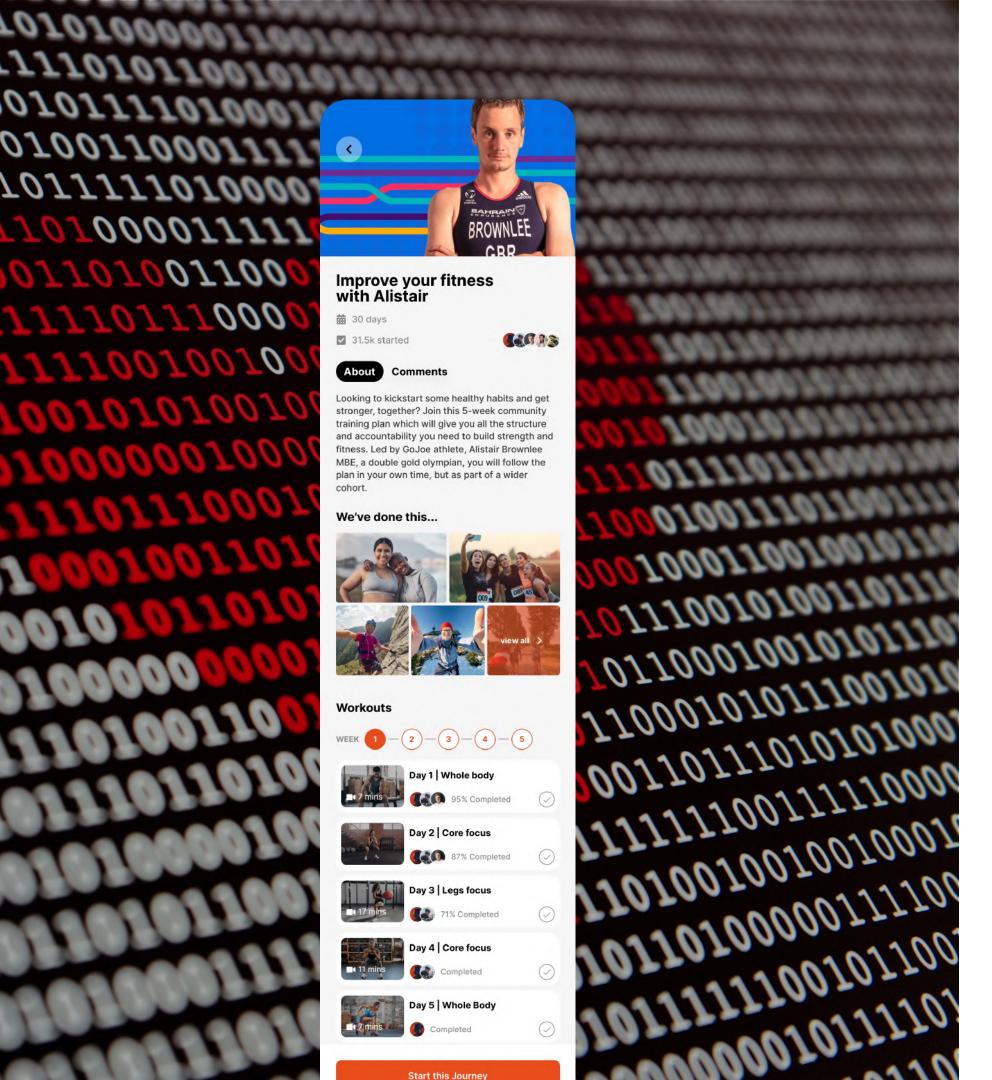
## Section 9. Compliance with 1SO 27001



### Internationally recognized standards.

GoJoe's commitment to security is exemplified by our adherence to the internationally recognized ISO 27001 standards, ensuring the highest level of data protection and management.



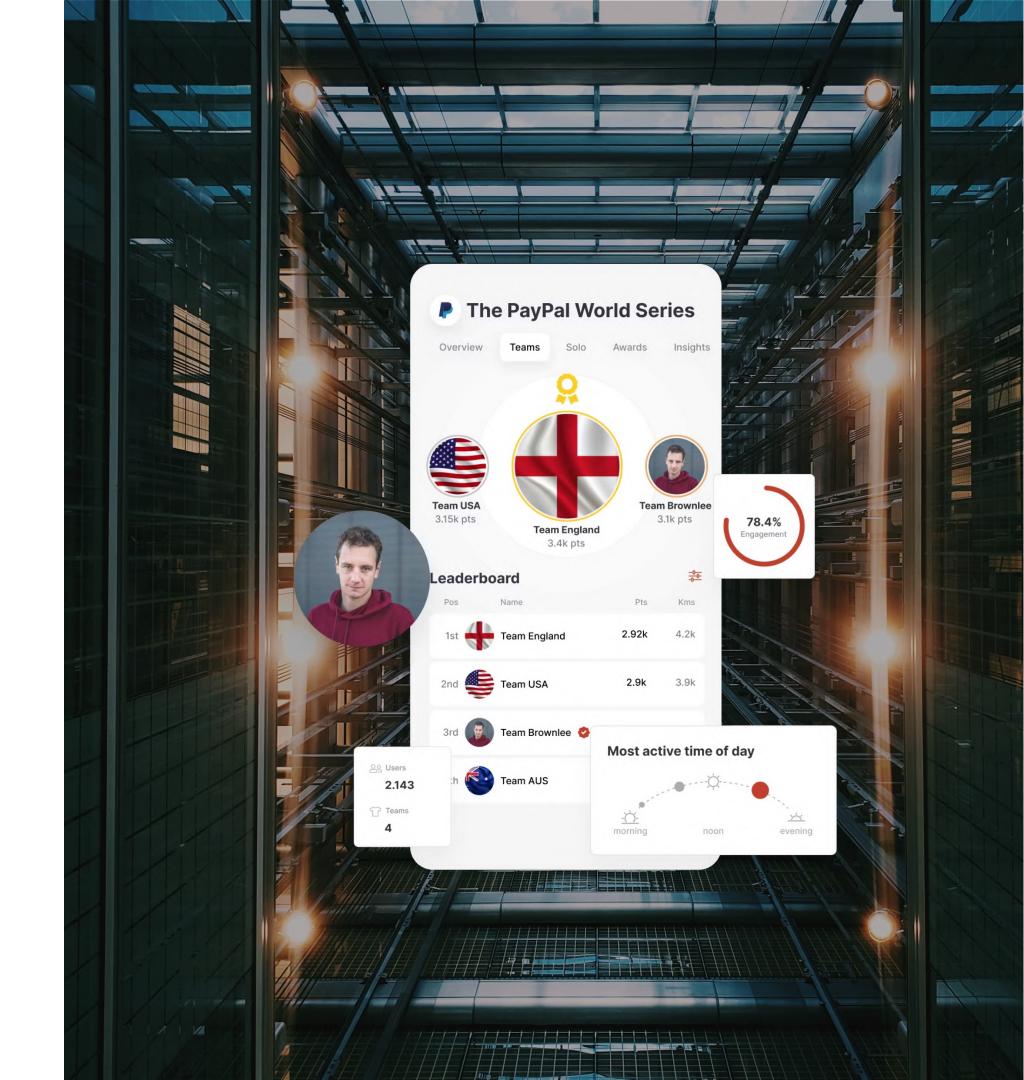


### ISO 27001 Framework Alignment.

GoJoe adheres to ISO 27001 standards with a mature, comprehensive ISMS, ensuring top-tier data security and privacy. Monitored by Drata for ISO 27001 compliance, we're dedicated to maintaining and enhancing our ISMS. Key infrastructure providers like AWS are ISO 27001 certified, and we're actively pursuing our own certification. GoJoe's information security manager ensures that better never stops and is actively tasked to monitor and improve our security controls all-year-round.

### Regular security evaluations.

We conduct frequent evaluations and updates of our security policies and procedures, ensuring they meet or exceed the stringent requirements of the ISO 27001 framework.





### **Employee Training and Awareness.**

Our team receives ongoing training in ISO 27001 principles, fostering a culture of security awareness and proactive risk management within GoJoe.

## Data security and privacy practices.

Our ISMS encompasses all aspects of data security and privacy, from secure data handling and encryption to incident response and user data rights protection.





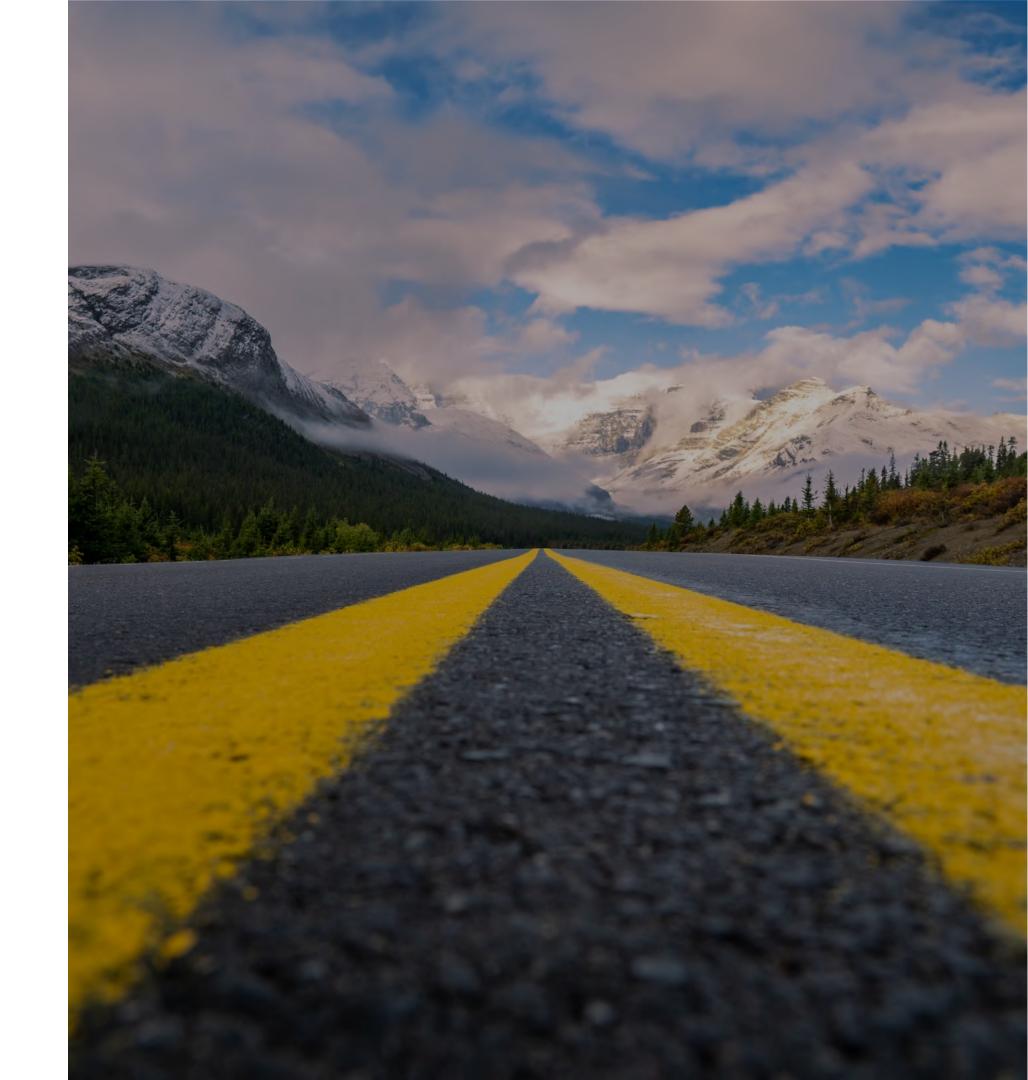
### **Third-Party Validation.**

We engage with external auditors like Evalian and security experts like Drata to validate our adherence to ISO 27001 standards, ensuring an unbiased assessment of our security posture.

DRATA evalian®

### Continuous Improvement and Adaptation.

Our commitment to ISO 27001 is not static; we continuously adapt our practices to evolving security threats and advancements, maintaining our position at the forefront of information security.



## Section 10. Policies & Procedures



Elite level policies & procedures

Acceptable Use Policies

GoJoe's extensive array of policies and procedures underpin our commitment to data security, privacy, and operational integrity.

All <u>policies & procedures</u> are available in our InfoSec Data Room.

**Acceptable Use Policy** Disaster Recovery Plan **Asset Management Policy Employee Handbook Backup Policy Encryption Policy Risk Assessment Policy Business Continuity Plan** Incident Response Plan Software Development Life **Code of Conduct** ISMS Plan Cycle Policy **Change Management Policy System Access Control Policy** Information Security Policy **Data Classification Policy Training Policy Password Policy** Data Retention Policy **Vendor Management Policy Physical Security Policy Vulnerability Management Responsible Disclosure Policy Data Protection Policy** Policy

# Section 11. Security Testing and Penetration Reports



### Evalian's Security & Pen Testing

GoJoe's robust approach to security includes comprehensive testing and penetration assessments, conducted in partnership with AppCheck and Evalian, leaders in cybersecurity.

- Security Partnerships: GoJoe partners with AppCheck and Evalian for rigorous security assessments, ensuring robust platform protection.
- Penetration Testing Insights: AppCheck and Evalian (Crest accredited) are used to conduct in-depth penetration testing, identifying and helping remediate vulnerabilities to enhance our defenses.
- Continuous Security Improvement: Results drive our ongoing security improvements, demonstrating our commitment to safeguarding user data.
- Building Trust through Transparency: We maintain transparency in our security efforts, reinforcing user trust with Evalian's expert validation.



















#### **Latest Penetration Test Result**

Evalian's latest Pen-Test on GoJoe took place on 18 May 2023. The security posture was Strong and the assessed level of security risk was Low. There were no unresolved vulnerabilities.

Strong **Security Posture** 

<u>Latest Pen Test Report</u>

Low

**Assessed level of security risk** 

# Section 12. FAQS



#### **FAQs**

- 1. What data protection standards does GoJoe adhere to? GoJoe strictly adheres to the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. We are aligned with the ISO 27001 standards, reflecting our commitment to international best practices in data security and privacy.
- 2. Is GoJoe registered with the Information Commissioner's Office (ICO)? Yes (reg no. ZA877813).
- 3. Is GoJoe GDPR compliant? Yes, GoJoe is fully compliant with the General Data Protection Regulation (GDPR). We have implemented comprehensive measures to ensure that our data handling practices align with GDPR requirements. This includes obtaining explicit consent for data processing, ensuring the right to access and delete personal data, and maintaining transparency in how user data is collected, used, and protected. Additionally, we conduct regular reviews and updates of our data protection policies and practices to stay current with GDPR standards, ensuring the utmost protection and privacy of our users' data.
- **4. What is GoJoe in a nutshell?** GoJoe is a digital health and fitness app that specializes in engaging corporate employees in wellness through team-based challenges and an annual engagement platform. It focuses on making fitness social and inclusive, leveraging a blend of activities, expert-led journeys, and a rich content library. Committed to data security, GoJoe adheres to high standards, including GDPR compliance and robust infrastructure like AWS.

- 5. What is the contractual framework between GoJoe, corporate clients, and end-users? GoJoe operates within a dual contractual framework. Firstly, we have a contract with corporate clients and organizations focusing on providing the wellbeing service. This contract outlines the services GoJoe will provide and the obligations of both parties. Secondly, we have separate contracts directly with the end-users typically the employees of or participants invited by these corporate clients. These users agree to GoJoe's terms of use and privacy policy upon GoJoe registration, establishing a direct relationship with us. This framework ensures clear delineation of responsibilities and rights, with GoJoe acting as both the data controller and processor for the end-users, thereby mitigating legal risks for our corporate clients and ensuring compliance with data protection regulations.
- **6. What information do we need to provide to GoJoe about our staff?** None. GoJoe does not require employee data from corporate clients, as users independently provide their information directly to us.
- 7. Does GoJoe have to link with our systems? No, GoJoe does not need to link with your corporate systems. Users (e.g. your staff) wanting to take part opt in and sign up to use GoJoe. This framework helps to mitigate legal risks on the corporate client's side and simplifies the implementation process, as there is no need for direct integration with your internal IT systems.
- **8. How does GoJoe ensure the security of our employees' data?** We ensure the security of data through robust measures like advanced encryption, multi-factor authentication, and secure data storage on AWS servers in Ireland, ensuring compliance with the highest data security standards.

- 9. What type of data does GoJoe collect from our employees, and why? GoJoe collects essential information like names and email addresses for account setup and optional health-related data for personalizing the fitness experience and performing the wellbeing services. This data is used exclusively to enhance user engagement and service customization. Users have complete control over what data to share.
- 10. Who has access to our employees' data within GoJoe? Access to data within GoJoe is strictly limited to authorized personnel who have undergone rigorous security screening and training, ensuring that data handling is compliant with our strict privacy policies.
- II. Does GoJoe share data with third parties? If so, who are they and why? Data sharing is limited and done only with trusted world-class service providers like AWS, Intercom, and others, to facilitate operational aspects like data storage and user support, all while adhering to our stringent data privacy policies. GoJoe neither sells data nor shares it without user consent. GoJoe uses industry-standard global leaders as part of its app infrastructure. The subcontractors are as follows: Amazon Web Services (AWS): Ireland (EU), Stream: Ireland (EU), Mixpanel: Netherlands (EU), Customer.IO: Ireland (EU), Forest: Ireland (EU) and Intercom: Ireland (EU). GoJoe also engages a number of specialist individual contractors as technical consultants or live chat support agents. GoJoe has International Data Transfer Agreements (in approved ICO form) with all individual contractors that may process data on behalf of GoJoe outside of the EEA.

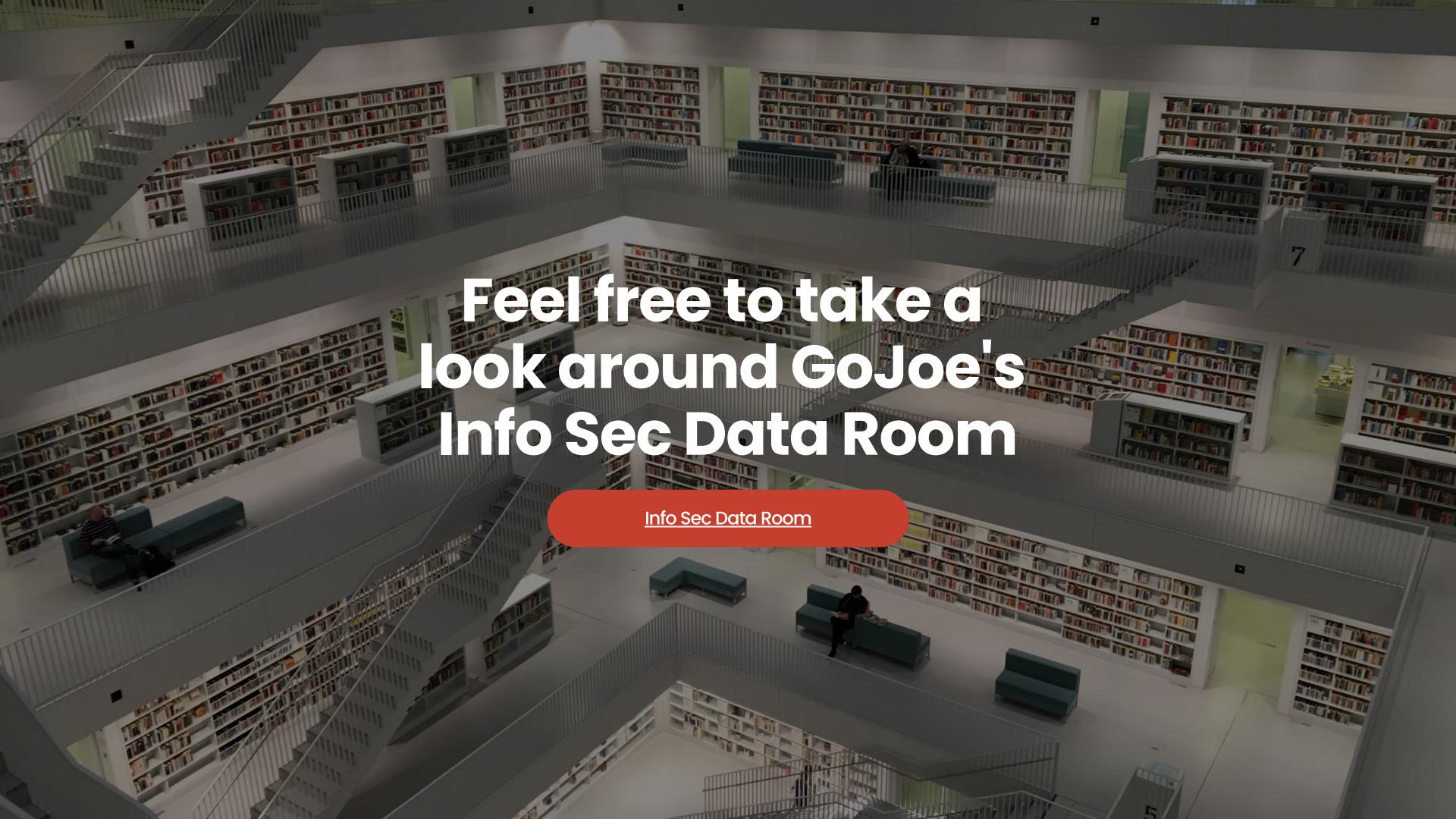
- 12. Which cloud service provider hosts your service? Amazon Web Services (AWS)
- 13. Is your cloud service provider certified to any security standard(s) such as ISO 27001? Yes ISO 27001
- 14. Do you have an information security manager? If so, please provide contact details. Yes Florin Bolcas, florin@GoJoe.com
- 15. How does GoJoe handle data breaches or security incidents? In case of a data breach or security incident, GoJoe has a comprehensive incident response plan for prompt action and mitigation, including notifying all affected parties and taking steps to prevent future occurrences.
- **16. Can our employees opt-out or request deletion of their data?** Absolutely. Employees can optout or request data deletion at any time, in accordance with our user-centric data policies that respect individual rights to privacy and data control.
- 17. What happens to employee data if we terminate our contract with GoJoe? Upon contract termination, employee data is handled as per GDPR guidelines and we further comply with our obligations to the end-user under the terms of use and privacy policy. We securely delete the data after a specified retention period (24 months without use), unless mandated otherwise by legal requirements.

- 18. How does GoJoe comply with international data transfer regulations? GoJoe ensures compliance with international data transfer regulations through stringent protocols and legal mechanisms like Standard Contractual Clauses, safeguarding data outside the EU.
- 19. Are GoJoe's information security and data privacy policies regularly reviewed and updated? Yes, we partner with the global security compliance expert, Drata, and regularly review and update our policies to stay aligned with the latest in cybersecurity and data privacy, adapting to new threats and regulatory changes to maintain the highest security standards.
- 20. Does GoJoe conduct regular security audits and penetration testing? GoJoe conducts regular security audits and penetration tests, partnering with leading security experts like Drata and Evalian, to proactively identify and address vulnerabilities, ensuring the platform's security is always up-to-date. The last pen test took place on 18 May 2023 by Evalian. The security posture was Strong and the assessed level of security risk was Low. There are no unresolved critical or high risk vulnerabilities.
- 21. How does GoJoe manage and secure user authentication? We manage user authentication through secure methods including email with multi-factor authentication. For added security and ease, we also offer Single Sign-On (SSO) options to our corporate clients.

- 22. Describe your employee screening process and/or background check process? GoJoe has a contract with and has engaged Drata the global security and compliance automation platform that continuously monitors and collects evidence of GoJoe's security controls, while streamlining compliance workflows end-to-end to ensure audit readiness. Each employee and contractor is subject to an employee screening process and background security check. As well as obtaining multiple external references, GoJoe engages Certn to carry out screening reports including undertaking criminal record and security checks. This is then monitored by Drata.
- **23.** Who can I contact if I require more information on information security and data privacy? GoJoe's Information Security Manager, Florin Bolcas, by email florin@gojoe.com or Director, Phil Steele, Phil@gojoe.com (+44(0)20 805 06562).

# Section 13. Info Sec Data Room





# Section 14. Contact Info.



#### Contact

For more questions on information security and privacy, contact our InfoSec Director Phil Steele in the first instance.

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