

**WELLIBA
PRIVACY NOTICE
THOMAS PRO DASHBOARD**

As of 1st September 2025

1. Overview

We have licensed our proprietary digital dashboard system referred to in this Notice as the Thomas Pro Dashboard to the Thomas Group of companies (“**Thomas**”) for them to resell to their customers (“**Thomas Customers**”). In order to be able to use the Thomas Pro Dashboard, each Thomas Customer appoints authorised users (**you**).

This Privacy Notice (“**Notice**”) relates to your use of the Thomas Pro Dashboard and provides you with relevant information as to what personal data is processed, how we process your personal data, with whom we share it, how long we keep it when you gain access to (by way of invitation or otherwise) (or access is removed temporarily or permanently), use, and interact with the digital dashboard system (and its technology) on its website (“**Thomas Pro Dashboard**”) in your capacity as an authorised user.

This Notice explains the processing of your personal data in our role as controller to such personal data. However, there may be situations where depending on the arrangements between your organisation being the Thomas Customer and Thomas where certain personal data relating to you may be provided to us by Thomas for example at the time of setting up access to the Thomas Pro Dashboard. In such circumstances, please refer to the privacy information provided by your organisation, the Thomas Customer.

This Notice also provides details of how to contact us if you have any queries or concerns about our use of your personal data. Please note that some information is only applicable where the GDPR applies to you.

Our use of Cookies is described in our Cookie Policy [[Cookie Notice | Thomas.co](#)]

2. Controller & Welliba Data Protection Officer

The below stated entity is the controller for your personal data. You can also use these details to contact our Data Protection Officer:

Welliba Global Sales Limited.
Comworks,
Railway House,
Station Road,
Loughrea,
Co. Galway,
Ireland.
E-Mail: privacy@welliba.com

3. Purpose and Legal Basis

Below you will find information about how we process your personal data, the type of personal data, the purpose for our processing, and the legal basis according to the GDPR if applicable:

3.1. Authorised Users

3.1.1 Use of the Thomas Pro Dashboard

The purpose of our processing is:

- (i) Technical and functional provision & optimisation of the Thomas Pro Dashboard;
- (ii) Understanding your interests;
- (iii) Provide information on our services;
- (iv) Complying with our obligations as regards any rights requests made by you.

Certain technical data is always processed by us when you visit and use the Thomas Pro Dashboard such as IP-Address, Session ID, and information concerning your systems browser and device. This ensures that we can provide you with the best possible service, that it is secure and functions correctly.

Certain functional data such as email address may also be processed by us in order for you to access and use the Thomas Pro Dashboard (and to remove access). This ensures that you are able to validly access the service. It allows us to validate who accesses the Thomas Pro Dashboard and to remove access as the case may be.

In order to comply with our obligations as regards any rights requests made by you (as specified in section 4.4 of this Notice) we may need to process certain personal data in order to satisfy such requests.

The legal basis for our processing is our legitimate interest (Article 6(1)(f) GDPR), our legitimate interests being the successful technical and functional provision of the Thomas Pro Dashboard, IT security, understanding user interests and providing information on our services in line with our business goals and satisfying any rights requests made by you.

3.1.2 Communication

We may use your basic contact information to communicate with you, but this will be of a limited nature. Such communication may be to provide you with notifications, legal updates (based on our legal obligations), to satisfy any rights requests made by you (if applicable) or other information that is relevant to your usage of the Thomas Pro Dashboard. We may receive communication data from Thomas.

The processing of personal data for such communication is based on our legitimate interests (Article 6(1)(f) GDPR) to be able to provide you with notifications, updates, and other relevant information about your usage of the Thomas Pro Dashboard.

4. General Information

4.1. Recipients of your Personal Data

Here you will find information about recipients of your personal data. We only share your personal data where it is necessary. We will never share your personal data without a valid reason or interest connected to the above stated purposes in section 3 of this Notice.

4.1.1 Internal & Affiliates of Welliba

We will share your personal data internally within the Welliba group of companies. We only do this where we have a defined reason for doing so.

4.1.2 Unaffiliated third parties

1. We may share your session related personal data (Session I.D and I.P address) with unaffiliated third parties who perform administrative, professional, or technological support functions.
2. If we are obliged to share your personal data due to legal requirements, we will only do so to the extent necessary in line with our legal obligations. We reserve the right to contact appropriate authorities when activities that are illegal or violate our policies occur in relation to the use of the Thomas Pro Dashboard.

4.2. Transfer to third countries and/or international organisations

If you are located in the European Union, personal data collected may be processed in a country where the adequacy of that countries data protection laws have not been approved by an adequacy decision of the European Commission. If applicable some service providers, for example, may be based outside the EU. Where we transfer personal data in this manner, we will take all steps reasonably necessary to ensure that your personal data is protected to an acceptable EU standard. The safeguards in place with regard to the transfer of your personal data outside of the EU to third parties shall include (but shall not be limited to) the entry by us into appropriate contracts with all transferees of such and the carrying out of risk assessments and adoption of supplementary and/or mitigating measures to ensure compliance with GDPR (if applicable).

If you would like more information as to how we protect your personal data in these circumstances, please contact the Data Protection Officer with the contact details we provided above or contact us at privacy@welliba.com.

4.3. Storage of your Personal Data

We only store your personal data for a period reasonable for our purposes of processing and/or for a period of time that is required of us by applicable laws. This may include retaining your personal data as necessary to comply with our legal obligations, to resolve disputes, to enforce our agreements, to support business operations, and to continue to develop and improve the Thomas Pro Dashboard.

We will implement appropriate technical and organisational measures to ensure a level of security appropriate to the risks that are presented by the processing of your personal data. In particular, we will consider the risks presented by accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to your personal data transmitted, stored or otherwise processed.

We do not process your data any longer than we need to. If you would like more information about our retention periods, please contact our Data Protection Officer with the contact details provided above.

4.4 Your Rights

You can use the contact information provided above and based on your specific situation and subject to our review to exercise the following rights set out in the table below. However, please note the rights of data subjects may be restricted on the basis of Art. 11 GDPR, as we may be unable to assign the participants to the use of the Thomas Pro Dashboard depending on the nature of such use and the nature of the personal data obtained. We will respond to any rights request within one month of receiving your request with reasons explained.

Right	Further Information
Right of Access (Article 15 GDPR)	<p>You have the right to request a copy of the personal data held by us about you.</p> <p>We will usually provide this free of charge. We will only charge you for making such an access request where we feel your request is unjustified or excessive.</p> <p>For security reasons, we will take reasonable steps to confirm your identity before providing you with any personal data we may hold about you.</p>
Right of Rectification (Article 16 GDPR)	<p>You have the right to request that we amend any inaccurate or incomplete personal data that we have about you.</p>
Right to Object (Article 21 GDPR)	<p>You have the right to ask us to stop using your personal information, and we will comply unless there is a legal basis for us to continue using it, which we will explain to you.</p>
Right to Erasure (Article 17 GDPR)	<p>You have the right to ask us to erase your personal data where:</p> <ul style="list-style-type: none"> • You object to the processing and we have no overriding legitimate grounds; • Your personal data has been unlawfully processed; or • It must be erased to comply with a legal obligation. • Sometimes we have to maintain records for legal reasons. If we cannot comply with your request then we will contact you and explain why. If you ask us to stop using your information we will still keep it, but we will not do anything with it.

Right to Restriction of Processing (Article 18 GDPR)	<p>You have the right to ask us to restrict processing your personal data in the following situations:</p> <ul style="list-style-type: none"> • Where you contest the accuracy of your personal data; • Where the processing is unlawful and you do not want us to delete your personal data; or • Where we no longer need your personal data for the purposes of processing but you require the data in relation to a legal claim. • When you exercise this right we may only store your personal data. • We may not further process the data unless you consent or the processing is necessary in relation to a legal claim or to protect the rights of another person or for reason of important public interest. • We will inform you before the processing restriction is lifted.
Right to Data Portability (Article 20 GDPR)	<p>You have rights to obtain and reuse your personal data for your own purposes across different services. You can request that we transfer information we hold about you to you or a third party in electronic form, where this is technically feasible.</p>
Right to be informed	<p>You have the right to clear, transparent and easily understandable information about how we use your information and your rights.</p>

4.5. Complaints

You may submit a complaint regarding your personal information to a supervisory authority regarding our processing of your personal data.

4.6. Provision of Personal Data

You are not legally required to share your personal data with us. Where our processing of your personal data is based on Article 6(1)(b) of the GDPR, we cannot carry out the contractual relationship without your personal data. Where our processing is based on another legal basis, it will often not be possible to fulfil the intended purpose without your personal data, or at least such fulfilment would be restricted without the provision of such personal data.

5. United States of America Addendum

This United States of America Addendum (“**Addendum**”) supplements the Notice and applies to all residents of the United States.

Certain state and federal laws of the United States of America (“**US Laws**”), such as the California Consumer Privacy Act 2018 as amended by the California Privacy Rights Act of 2020 (“**CPRA**”) require us to disclose the following information with respect to our collection, use and disclosure of personal data:

- Categories and specific pieces of personal data collected.
- Business or commercial purpose for collecting and using personal data.
- Category (ies) of sources of personal data.
- Category (ies) of personal data disclosed.
- Categories of third parties to whom we disclose personal data.
- Information regarding our data retention practices.

Details regarding the above are provided below.

5.1 Personal Data Rights

Under the CPRA and other similar US Laws, residents of certain US states have some of the rights provided under section 4.4 above, in addition to other rights, as follows:

Rights under section 4.4 of the Notice:

- Right of Access (to Know)
- Right of Rectification (to Correct)
- Right to Erasure (to Delete)
- Right to Data Portability

Additional Rights:

- Opt out of the “**sale**” or “**sharing**” of personal data, as those terms are defined in certain US Laws. We do not as a matter of course “sell” or “share” personal data, in accordance with the definition of “**sell**” or “**share**” in US Laws.
- Non-Discrimination and Non-Retaliation. We will not discriminate or retaliate against you for exercising any of your rights under certain US Laws. Unless permitted by US Laws, we will not deny you services; charge you different prices or rates for services, including through granting discounts or other benefits, or imposing penalties; provide you a different level or quality of services; and/or suggest that you may receive a different price or rate for services or a different level or quality of services.

Exercising Your Rights:

For more information on how to exercise your rights please contact us in accordance with the contact details provided above. We may request further information from you (if possible) to verify your identity as permitted or required by applicable laws before fulfilling a rights request. We may not be able to respond to your request if we cannot verify your identity.

We may not be able to fulfil your request or some parts of your request depending on our legal obligations or certain exemptions under applicable laws. For example, we may not be able to delete or anonymise all data as we may be legally required to retain certain data or retain certain data in identifiable form. If you have any questions about how we process your personal data under applicable laws in your area, you may contact us as set out above.

You have the right to appoint an agent who is registered with the appropriate US state agency or government entity to submit requests and exercise the above rights on your behalf. We may require the agent to submit to us written permission from you as well as have you verify your identity directly with us to protect the security of your personal data. In the event an agent is not able to provide written permission to act on your behalf, we may deny a request in accordance with applicable laws. We will respond to a verifiable request within the time periods required by the applicable laws, which may differ from the GDPR. If more time is required, we will comply with any such applicable requirements. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

5.2 Personal Data Processed

We collect the categories of personal data identified above in Section 3 (which is of a very limited nature) which may be categorised as follows:

- Identifiers such as email address, IP address, Session I.D.
- Electronic and device information such as IP address, details about your device, browsing history, search history, or other applications on the device.

We collect this automatically through the Thomas Pro Dashboard and/or from your organisation, and from other sources, each of which is more particularly described above and in section 3 of this Notice.

5.3 Purposes of Processing Personal Data

We collect personal data for business purposes identified above in section 3 of the Notice. More specifically, we use the personal data to:

- Provide, secure and improve the Thomas Pro Dashboard and ensure it functions correctly.
- Communicate with you about the Thomas Pro Dashboard which your organisation signed you up for or respond to your inquiries regarding Welliba or the Thomas Pro Dashboard.
- Prevent fraud and conduct and comply with auditing activities.
- Comply with our legal obligations, including legal processes regarding disclosures of information, and, where necessary, for the establishment, exercise, or defense of legal claims.

5.4 Recipients of Personal Data

We have disclosed the categories of personal data for business or commercial purposes as set forth above in Section 3 of the Notice. We may share your personal data with the third parties as described above in Section 4.1.2. of the Notice. More specifically, we share your personal data as follows:

- Internally within Welliba and the Welliba Group for reasons such as providing and improving the Thomas Pro Dashboard, providing you technical support.
- With third party service providers who provide services to us, where such service providers only use your personal data for purposes of providing us a service and only pursuant to applicable terms.
- With law enforcement or governmental authorities when required to by law (such as in conjunction with subpoenas, search warrants, court orders or similar legal processes) or where activities that are illegal or violate our policies occur in connection with the Thomas Pro Dashboard.
- With your organisation or third-party service providers in the context of transfers to third countries and / or international organisations (if applicable), as set forth in section 4.2 of this Notice.

5.5 Retention and Security of Personal Data

Please see above section 4.3 of the Notice for details regarding the time period for which we retain personal data and how and when we delete personal data. The criteria we use to determine how long we retain personal data may include such factors as the purposes for which we collected and used it, requirements of applicable laws, the amount and nature of the information, the potential risk of harm from unauthorised use or disclosure of the information, the resolution of any pending or threatened disputes, and enforcement of our agreements.

Please see above section 4.3 of the Notice for details regarding how we secure and protect personal data. Although we use measures to protect your personal data, we cannot guarantee the security of your personal data transmitted to the Thomas Pro Dashboard or otherwise to Welliba. Any transmission of personal data is at your own risk. We are not responsible for circumvention of any privacy settings or security measures of the Thomas Pro Dashboard.

6. Children's Data

We do not knowingly collect personal data from children under the age of 16. If you are under the age of 16, please do not provide any information to us. If we become aware that we have collected information from a child under the age of 16, we will make commercially reasonable efforts to delete the information from our systems. We may request consent to process personal data of individuals between the ages of 16 and 18, as required by certain US Laws. The Thomas Pro Dashboard is not directed to children under the age of 16.

7. Additional Choices

- Choosing not to share your Personal Data. You may choose not to provide personal data. If you choose not to provide personal data (or ask us to delete it), we may not be able to provide you with the Thomas Pro Dashboard or certain functionality of the system. We will tell you or Thomas what information you must provide to receive and gain access to the Thomas Pro Dashboard or other functionality by designating it as required as the time of collection or through other appropriate means.
- Cookies and Browser Web Storage. Please see our Cookie Policy.