

More Happi Limited

c/o Jump Accounting, 131 Finsbury Pavement, London EC2A 1NT

Company Registration No. 12568373

ICO Registration Reference: ZB300608

Privacy Policy

This Privacy Policy explains how More Happi Ltd (“More Happi”, “we”, “us”, or “our”) collects, uses, stores, and shares personal data in connection with our website (morehappi.com) and coaching platform. Please read it carefully.

We take your privacy seriously and are committed to handling your personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

1. Who We Are

More Happi Ltd is a company incorporated in England and Wales with company number 12568373. Our registered office is at c/o Jump Accounting, 131 Finsbury Pavement, London EC2A 1NT. ICO Registration Reference: ZB300608.

For the purposes of UK data protection law, More Happi acts as a data processor when handling the personal data of employees of our corporate client organisations, and as a data controller when handling data collected directly through our website and marketing activities.

If you have any questions about this Privacy Policy or how we handle your data, please contact us at hey@morehappi.com or our Data Protection Officer at dpo.morehappi@legalnodes.com.

2. What Data We Collect

2.1 Data collected through our website

When you visit our website, we may collect:

- Your name and contact details (e.g. email address, telephone number) if you contact us or complete a form
- Job title and employer name
- IP address and device/browser information (collected automatically)
- Information about how you use our website, including pages visited and time spent on the site
- Cookie data see Section 8 for more information

2.2 Data collected through our platform

When employees of our corporate clients use the More Happi coaching platform, we collect:

- Name and work email address
- Employer name
- Job title, job level, and manager status
- Phone number and timezone
- Coaching theme or topic area selected (where applicable)
- Coach matching enquiry responses
- Pre-session wellbeing score and wellbeing assessment responses
- Date(s) of coaching sessions and name of coach
- Session rating, NPS score and feedback
- Chemistry session feedback
- Programme or session cancellation reasons
- Testimonials (where voluntarily provided)

We do not store notes from coaching sessions. Sessions must not be recorded and no session content is held within our platform.

2.3 Data collected about volunteer coaches

When coaches apply to or volunteer with More Happi, we collect:

- Name, email address, and contact details
- Coaching qualifications and accreditation information
- Coaching hours and session history
- Feedback and testimonials received

3. How We Use Your Data

- To provide and manage access to our coaching platform and services
- To match coachees with appropriate volunteer coaches
- To send service-related communications (e.g. booking confirmations, reminders, onboarding information)
- To send weekly educational emails to platform users (you may unsubscribe at any time)
- To monitor platform usage, improve our services, and carry out quality assurance
- To manage our relationships with corporate client organisations

- To manage our volunteer coach community
- To meet our legal and regulatory obligations
- To respond to enquiries and provide customer support

4. Our Legal Basis for Processing

We rely on the following legal bases under UK GDPR:

- Contract performance where processing is necessary to deliver our services under a contract
- Legitimate interests where we have a legitimate business reason, such as improving our platform, quality assurance, and service communications, and where this does not override your rights
- Legal obligation where processing is required by law
- Consent for marketing communications and optional data uses, where we will ask for your consent separately

Where we rely on legitimate interests, you have the right to object to that processing. See Section 9 for your rights.

5. Who We Share Your Data With

5.1 Volunteer coaches

When a coachee books a session, we share limited information with the assigned volunteer coach. This includes the coachee's name, work email address, employer name, and the broad theme of coaching requested. Coaches are bound by confidentiality and data protection obligations under their Volunteer Coach Agreement.

5.2 Corporate client organisations

We provide aggregated and anonymised reporting to the corporate organisations that subscribe to our platform. We do not share individual session content. We may share usage statistics (e.g. number of sessions completed, engagement rates) to help clients understand the value of the service.

5.3 Third-party service providers (sub-processors)

We use a number of third-party tools and services to operate our platform. These providers act as sub-processors and are contractually required to handle data securely and only for the purposes we specify. Our current sub-processors are:

Name	Services Provided	Location
HubSpot	CRM and marketing communications	US
Google (Google Workspace)	Email, documents, cloud storage	US

Retool	Internal platform tools	Germany
Planetscale	Database platform	US
Amazon Web Services	Cloud storage and infrastructure	Ireland
Chargebee	Payment processing and subscription management	US
Intercom	Customer communications and support	US
Mixpanel	Product analytics and user behaviour tracking	US
Sentry	Error tracking and platform monitoring	US
AWS Cognito	Authentication and session management	US
Anthropic, PBC	AI-powered tooling used across More Happi internal business operations only.	US
Postmark	Transactional email delivery processes email addresses and email content in the course of sending platform notifications and communications	US
Zoom	Video conferencing platform used for customer masterclasses processes participant names, email addresses and attendance data	US
PandaDoc	Document management and e-signature platform processes signatory name, email address and signature data	US
Slack	Internal communications platform may process personal data contained in notifications or messages relating to platform activity	US
Zapier	Workflow automation transfers data between the More Happi platform and other tools; may process personal data in the course of automation workflows	US

We keep this list up to date. If we add a new sub-processor that will process personal data, we will notify relevant parties in accordance with our Data Processing Agreement.

5.4 Use of AI tools

We use AI-powered tools, including Claude (provided by Anthropic PBC, United States), to support our internal business operations only. Anthropic does not use data processed through our account to train its AI models.

5.5 Other disclosures

We may also share data:

- With our professional advisors (e.g. lawyers, accountants) where necessary
- With regulatory authorities or law enforcement where required by law
- In connection with a business sale or transfer, where data may transfer to a new owner

6. International Data Transfers

Some of our sub-processors are based outside the UK and European Economic Area (EEA), including in the United States. Where we transfer personal data internationally, we ensure appropriate safeguards are in place, including:

- Standard Contractual Clauses (SCCs) approved by the European Commission
- International Data Transfer Agreements (IDTAs) approved by the UK ICO
- Transfers to countries with an adequacy decision

You can request further information about the specific safeguards in place for any transfer by contacting us at hey@morehappi.com.

7. How Long We Keep Your Data

We retain personal data only for as long as necessary for the purposes for which it was collected, or as required by law. Our standard retention periods are:

- Employee coaching data (platform accounts, session history, feedback): deleted or fully anonymised within 30 days of the end of the relevant client contract, at the choice of the client organisation, in accordance with our obligations as a data processor under UK GDPR Article 28. Fully anonymised data (from which no individual can be identified) may be retained thereafter for quality assurance and platform improvement purposes.
- Website enquiry and contact data: retained for 12 months
- Volunteer coach data: retained for 2 years after the end of the coaching relationship
- Financial and billing records: retained for 7 years in line with HMRC requirements

When data is no longer required, we securely delete or anonymise it. Some data may persist in encrypted backups for a short additional period before being permanently deleted.

8. Cookies and Tracking Technologies

Our website and platform use cookies and similar tracking technologies. These include:

Strictly necessary cookies

Required for the platform to function, including authentication (managed via AWS Cognito) and session management. These cannot be disabled.

Analytics cookies Mixpanel

We use Mixpanel to understand how users interact with our platform, including which features are used and how users navigate. This helps us improve the product. Mixpanel data is processed in the United States.

Error tracking Sentry

We use Sentry to capture technical errors and crashes on our platform. Sentry collects data about user sessions when errors occur in order to help our team diagnose and fix issues. Sentry data is processed in the United States.

Support and communications Intercom

We use Intercom for our support chat widget. Intercom collects behavioural data including page views and user information as part of how the tool operates. Intercom data is processed in the United States.

Standard analytics Google Analytics

We use Google Analytics on our marketing website to understand visitor behaviour, including traffic sources and page performance.

You can control cookie preferences through your browser settings. Please note that disabling certain cookies may affect the functionality of the platform.

9. Your Rights

Under UK GDPR, you have the following rights in relation to your personal data:

- Right of access to request a copy of the personal data we hold about you
- Right to rectification to request that inaccurate or incomplete data is corrected
- Right to erasure to request deletion of your data in certain circumstances
- Right to restriction to request that we limit how we use your data
- Right to data portability to receive your data in a structured, machine-readable format
- Right to object to object to processing based on legitimate interests or for direct marketing
- Rights related to automated decision-making we do not make solely automated decisions that significantly affect you

To exercise any of these rights, please contact our Data Protection Officer at dpo.morehappi@legalnodes.com or email us at hey@morehappi.com. We will respond within one month. We may need to verify your identity before processing your request.

If you are not satisfied with how we have handled your data or a complaint you have raised, you have the right to lodge a complaint with the Information Commissioner's Office (ICO) at ico.org.uk.

10. Data Security

We implement appropriate technical and organisational measures to protect personal data against unauthorised access, loss, or misuse. These include:

- Data encrypted at rest and in transit within our platform
- Role-based access controls (RBAC) ensuring staff only access data they need
- Two-factor authentication on key systems
- Regular data backups
- Access revocation processes when staff or contractors leave
- Authentication managed via AWS Cognito with encryption and email verification

If you become aware of or suspect any misuse or unauthorised access to your data, please contact us immediately at hey@morehappi.com.

11. Third-Party Links

Our website may contain links to third-party websites. We are not responsible for the privacy practices of those websites and this Privacy Policy does not apply to them. We encourage you to read their privacy policies before providing any personal data.

12. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes to our practices or legal requirements. We will post any updated version on our website at morehappi.com and update the "Last updated" date at the top of this document. For material changes, we will provide appropriate notice.

Your continued use of our services following any update constitutes acceptance of the revised policy.

13. Contact Us

If you have any questions about this Privacy Policy or how we handle your personal data, please contact us:

General enquiries	hey@morehappi.com
Data Protection Officer	dpo.morehappi@legalnodes.com
Registered address	c/o Jump Accounting, 131 Finsbury Pavement, London EC2A 1NT

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