

## **Privacy Policy - OpenUpUEA**

OpenUpUEA is committed to protecting and respecting your privacy in connection with your use of our app, (website information - <https://www.uea.ac.uk/psychology/openup-uea> and features which may be updated from time-to-time at the sole discretion of OpenUpUEA). This privacy policy and any other documents referred to in this document explain how any personal information we collect from you, or that you provide to us, in connection with the OpenUpUEA app will be processed by us. Please read the following carefully to understand our practices regarding your personal information and how we will collect, use and disclose your personal information. The data collection and usage has been evaluated and approved by the School of Psychology (UEA) Ethics Committee on 23 August 2018, Ref: 2018-0015-001146.

### **1. INFORMATION WE MAY COLLECT FROM YOU**

We may collect and process the following information about you. The data controller is the University of East Anglia:

- Personal information including, for example, your name, e-mail address
- Information about your usage of the app features which is aggregated with other user data to help develop the app.
- The app does not share information with third parties such as your name, and email address unless required to in circumstances outlined in Section 9.
- Google analytics will collect device Information such as operating system version, device type, and system performance information.
- Usage information collected via tracking technologies, as fully described in Section 4
- OpenUpUEA does not collect or process credit or debit card ("Payment Card") information.
- OpenUpUEA does not store any financial information.

### **2. USES MADE OF THE INFORMATION**

We use information held about you in the following ways:

- To ensure that content provided by the OpenUpUEA app is presented in the most effective manner for you and for your phone or tablet.
- To provide you with information, products or services related to OpenUpUEA that you will facilitate your engagement with the OpenUpUEA app.
- To provide you with customer service communications.
- To carry out our obligations arising from any agreements entered into between you and us.
- To allow you to participate in interactive features of the OpenUpUEA app, when you choose to do so.
- To notify you about changes to the OpenUpUEA app.
- To understand your broad, non-specific geographic location to help us identify groups of users by general geographic market (such as zip code, state or country).
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Details of your visits to and interactions with the OpenUpUEA app including all app features.
- If you are an existing user, we will only contact you by electronic means (e-mail or in-app communication) with information about products and services related to the app.

We do not disclose information about identifiable individuals to third parties, but we may provide them with aggregate information about our users (for example, we may inform them that 500 students in year 1 have used the app on any given day). We may also use such aggregate information to help improve student support services at UEA.

We will hold your information for as long as it is needed for app functionality or the deletion of your account.

### **3. CONFIDENTIALITY AND SECURITY**

The security of your personal information is important to us. We follow generally accepted standards to protect the personal information submitted to us, both during transmission and once it is received. If you have any questions about the security of your personal information, you can contact us at [openup@uea.ac.uk](mailto:openup@uea.ac.uk). Except as described in Section 9, we do not provide your personal information to any third party without your specific consent, as defined by applicable law.

### **4. TRACKING TECHNOLOGIES**

OpenUpUEA and our analytics partners use technologies such as cookies, beacons, tags, and scripts to enable a service to recognize your device so you don't have to provide the same information several times during one task, recognize that you may have already given a username and password so you don't need to do it for every page requested, and to measure how people are using the app.

The OpenUpUEA app uses Google Analytics code to gather statistical information. Google Analytics sets cookies to help us accurately estimate the number of visitors to the OpenUpUEA app (e.g. via downloads at google playstore) and the volumes of usage of the OpenUpUEA app. This is done to ensure that the OpenUpUEA app is available when you want it and is fast. For more information on how Google Analytics processes this information, visit [www.google.com/analytics](http://www.google.com/analytics).

#### **4.a. MOBILE ANALYTICS**

We use mobile analytics software to allow us to better understand the functionality of our mobile software on your phone. This software may record information such as how often you engage with the OpenUpUEA app, the events that occur within the OpenUpUEA app features, aggregated usage and performance data, and where the Applications were downloaded from. We will link the information we store within the analytics software to any personal information you submit within the OpenUpUEA app so that your data can be deleted on request.

### **5. WHERE WE STORE YOUR PERSONAL INFORMATION**

Your data will be held by [Digital Ocean, <https://www.digitalocean.com/>] on servers located in the UK. Digital Ocean is Privacy Shield registered and acts as a data processor for UEA, and only processes personal information in line with our instructions.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of the OpenUpUEA app, you are responsible for keeping this password confidential. We ask you not to share a password with anyone and suggest that you change your password frequently.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your information transmitted to the OpenUpUEA app; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

## **6. LINKS TO THIRD PARTY SITES**

The OpenUpUEA app may, from time to time, contain links to and from the other websites. If you follow a link to any of these external websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these websites or their policies. Please check these policies before you submit any personal information to these external websites.

## **7. USE OF OPENUPUEA BY UNDER 18's**

You must be 18 years of age, or the age of majority in your province, territory or country, to sign up as a registered user of the OpenUpUEA app. Individuals under the age of 18, or the applicable age of majority, may utilize the OpenUpUEA app only with the involvement and consent of a parent or legal guardian, under such person's account and otherwise subject to these Terms.

## **8. CORPORATE AND OTHER COMMUNITY SHARING**

There may be interest by large consumer communities (companies, universities, hospitals, etc.) to introduce the OpenUpUEA app to their employees and members. If you have signed up to the OpenUp UEA Research community the research team will have access to your anonymised usage information and the research team may publish aggregated data in academic articles or conferences. No personal data will be shared with third parties, other than the cloud host platform, Digital Ocean and in situations as described in Section 9.

## **9. DISCLOSURE OF YOUR INFORMATION**

We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries.

We may also disclose your personal information to third parties as follows:

- If OpenUpUEA's service providers (like hosting, market analytics) require this information to provide services to OpenUpUEA. OpenUpUEA requires each of its service providers to agree to maintain the confidentiality and security of your personal information.
- In the event that we sell or buy any business or assets, in which case we may disclose your personal information to the prospective seller or buyer of such business or assets.
- If OpenUpUEA or substantially all of our assets are acquired by a third party, in which case personal information held by us about our customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal information in order to comply with any legal obligation such as to comply with a subpoena, bankruptcy proceedings, similar legal process, or in order to enforce or apply our agreements with you; or to protect the rights, property, or safety of OpenUpUEA, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

## **10. ACCESS TO AND DELETION OF PERSONAL INFORMATION**

- Upon request, OpenUpUEA will provide you with information about whether we hold, or process on behalf of a third party, any of your personal information. To request this information, please email [OpenUp@uea.ac.uk](mailto:OpenUp@uea.ac.uk). You may access your personal information to modify or update at any time via the settings menu in the app.
- To request the deletion of your personal data that we have on file please email us at [OpenUp@uea.ac.uk](mailto:OpenUp@uea.ac.uk). Upon request, OpenUpUEA will permanently and irrevocably anonymize your data such that it can never be reconstructed to identify you as an individual.
- We will respond to your request in a reasonable timeframe.

## **11. WITHDRAWAL OF CONSENT FOR PROCESSING ACTIVITIES**

To the extent that you have provided appropriate consent under applicable law to certain processing activities, such as use of data for research purposes, such consent can be withdrawn at any time within the OpenUpUEA app in settings or by emailing [openup@uea.ac.uk](mailto:openup@uea.ac.uk).

## **12. NEWSLETTERS OR OTHER ELECTRONIC COMMUNICATIONS**

If you sign up to use the app we will use the email you give us to provide essential information about the operating of the app. If you need to contact us, please email: [openup@uea.ac.uk](mailto:openup@uea.ac.uk).

## **13. CHANGES TO OUR PRIVACY POLICY**

We may update this Privacy Policy to reflect changes to our information practices. If we make any material changes we will notify you by in-app message, email (sent to the e-mail address specified in your account) or by means of a notice in the OpenUpUEA app prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

## **14. CONTACT**

This Privacy Policy is effective and was last updated on 3 September 2018. Information about the OpenUpUEA app can be found on the website: <https://www.uea.ac.uk/psychology/openup-uea>

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to: [openup@uea.ac.uk](mailto:openup@uea.ac.uk).

OpenUpUEA's physical address is School of Psychology, Lawrence Stenhouse Building, University of East Anglia, Norwich, NR4 7TJ. Email: [openup@uea.ac.uk](mailto:openup@uea.ac.uk).

You can find out more about your data protection rights at: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>. 'If you are unhappy with how we've used your personal data you can make a complaint to the Information Commissioner's Office. See: <https://ico.org.uk/concerns/>