

Mobile application privacy policy

A policy for use by a business that offers a mobile app on a website, offers services through the app, collects non-sensitive personal data in connection with an individual's use of the app and those services and stores and uses the data for the purpose of supplying those services and for contacting users with direct marketing information.

Staffs pathway (**we**) are committed to protecting and respecting your privacy.

SCOPE OF POLICY

This policy (together with our end-user license agreement as set out at [www.staffspathway.co.uk/eula.html] (**EULA**) and any additional terms of use incorporated by reference into the EULA, together **our Terms of Use**) applies to your use of:

- [Staffs Pathway v1.5] mobile application software (**App**) [available on our site **OR** hosted on [www.staffspathway.co.uk]] (**App Site**), once you have downloaded or streamed a copy of the App onto your mobile telephone or handheld device (**Device**).
- Any of the services accessible through the App (**Services**) that are available on the App Site or other sites of ours (**Services Sites**), unless the EULA states that a separate privacy policy applies to a particular Service, in which case that privacy policy only applies.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how We will treat it.

For the purpose of the Data Protection Act 1998, the data controller is [Staffs Students Union] of [Students' Union, College Road, Stoke-on-Trent, ST4 2DE].

INFORMATION WE COLLECT FROM YOU

1.1 We will collect and process the following data about you:

- **Information you give us (Submitted information):** This is information you give us about you by filling in forms on the App Site and the Services Sites (together **Our Sites**), or by corresponding with us (for example, by e-mail or chat). It includes information you provide when you register to use the App Site, download or register an App, subscribe to any of our Services, search for an App or Service, [make an in-App purchase], [enter a competition, promotion or survey], [OTHER ACTIVITIES COMMONLY CARRIED OUT IN CONNECTION WITH AN APP] and when you report a problem with an App, our Services, or any of our Sites. If you contact us, we will keep a record of that correspondence. The information you give us may include your name, address, e-mail address and phone number, the Device's phone number, age, username, password and other registration information, financial and credit card information, personal description and photograph.
- **Information we collect about you and your device.** Each time you visit one of our Sites or use one of our Apps we will automatically collect the following information:
 - technical information, including the type of mobile device you use, mobile network information, your mobile operating system, time zone setting, GPS location (Device Information);
 - information stored on your Device, including [contact information,] [friends lists,] [login information,] [photos, videos or other digital content,] [check ins,] [OTHER INFORMATION] (Content Information);
 - details of your use of any of our Apps or your visits to any of Our Sites including, but not limited to [traffic data,] [weblogs] [and other communication data,] whether this is required for our own billing purposes

or otherwise [and the resources that you access] (Log Information)].

- **Location information.** We also use [GPS technology] OR [OTHER TECHNOLOGY] to determine your current location. Some of our location-enabled Services require your personal data for the feature to work. If you wish to use the particular feature, you will be asked to consent to your data being used for this purpose. You can withdraw your consent at any time by disabling location services within your device settings menu.
- **Unique application numbers:** when you install or uninstall a Service containing a unique application number or when such a Service searches for automatic updates, that number and information about your installation, for example, the type of operating system, may be sent to us.

COOKIES

We use cookies to distinguish you from other users of the App, App Site, Appstore or Service Site. This helps us to provide you with a good experience when you use the App or browse any of the sites and also allows us to improve the App and Our sites. For detailed information on the cookies We use and the purposes for which We use them, see our cookie policy www.staffspathway.co.uk/cookies.html.

Google Analytics

By using the service you confirm that you understand and agree to the use of Google Analytics.

Google Analytics generate reports based on anonymised user data to help accurately estimate the number and usage patterns of users of the App so we can improve our users' experience: The privacy policy for Google Analytics and Tag Manager can be found at: <https://www.google.com/policies/privacy>

USES MADE OF THE INFORMATION

We use information held about you in the following ways:

- Device information: [Keep a record of the types of devices used for statics reasons].
- Location information: [Keep a record of where users spend most of their time on campus, providing us with heat maps].
- Unique application numbers: [Unique random number is generated so we know the difference between users].
- Date / Time: [Date and time of the app in use will be store for statics reasons].

WHERE WE STORE YOUR PERSONAL DATA

The data that We collect from you will be transferred to, and stored at, a destination outside the European Economic Area (**EEA**). It will also be processed by staff operating outside the EEA who work for us or for one of our suppliers. These staff may be engaged in the fulfilment of your request, order or reservation, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. [Staffs Students Union] **OR** We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. Any payment transactions [carried out by us or our chosen third-party provider of payment processing services] will be encrypted [using Secured Sockets Layer technology] Where We have given you (or where you have chosen) a password that enables you to access certain parts of Our Sites, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although We will do our best to protect your personal data, We cannot guarantee the security of your data transmitted to Our Sites; 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 unauthorised access.

YOUR RIGHTS

We will usually inform you (before collecting your data) if We intend to use your data for such purposes or if We intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms We use to collect your data. You can also exercise the right at any time by contacting us at Students' Union, College Road, Stoke-on-Trent, ST4 2DE **OR** [union@staffs.ac.uk].

Our Sites may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates (including, but not limited to, websites on which the App or the Services are advertised). If you follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own privacy policies and that We do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services, such as contact and location data. Please check these policies before you submit any personal data to these websites or use these services.

ACCESS TO INFORMATION

The Data Protection Act 1998 gives you the right to access information held about you. Your right of access can be exercised in accordance with that Act. Any access request will be subject to a fee of £10 to meet our costs in providing you with details of the information We hold about you.

CHANGES TO PRIVACY POLICY

Any changes We may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you [by SMS **OR** by e-mail **OR** when you next start the App or log onto one of the Services Sites]. The new terms may be displayed on-screen and you may be required to read and accept them to continue your use of the App or the Services.

CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Students' Union, College Road, Stoke-on-Trent, ST4 2DE **OR** union@staffs.ac.uk

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