

Privacy Policy for PLUS Summer Schools App

Effective date: 13th May 2024

This privacy policy outlines how the PLUS Summer Schools app collects, uses, stores, and protects user data, ensuring transparency and adherence to data protection regulations.

1. App Name and Description:

- What is the name of the app?
 - PLUS Summer Schools
- What does the app do?
 - The app is designed for summer school students and group leaders to find key
 information related to their stay. It displays information such as the campus map,
 check-in/out times and location, emergency procedures, local healthcare,
 housekeeping, on-campus Wi-Fi access procedure, meal times, a personalised group
 activity programme, walking tour videos, summer school management contact details,
 handbooks, policies, and other helpful information.

2. Data Collection:

- What types of personal data does the app collect?
 - The app collects the user's full name and date of birth. No other personal data is collected. The app is designed solely for viewing information and does not require or request any additional personal information from users beyond the full name and date of birth used for login.
- How is this data collected?
 - The user's full name and date of birth are collected through user input. This
 information is entered by the users themselves upon login to the app. No other
 methods of data collection, such as automated data collection or third-party sources,
 are used.

3. Data Usage:

- How is the collected data used?
 - The collected data, which includes the user's full name and date of birth, is used solely to personalise the user experience. This information helps tailor the content and features within the app to each individual user, ensuring a more relevant and engaging experience.

4. Data Sharing:

• Does the app share user data with third parties?



• No, the app does not share user data with third parties. The user's full name and date of birth are used exclusively within the app to personalise the user experience and are not shared with any external entities.

5. Data Storage and Security:

How is user data stored?

• User data, including full names and dates of birth, is stored in encrypted databases. This ensures that all personal information is securely protected and accessible only by authorised personnel.

• What security measures are in place to protect user data?

- Access controls: Limiting access to user data to only authorised personnel through robust authentication mechanisms like multi-factor authentication.
- Regular security audits and updates: Continuous monitoring and updating of security measures to address emerging threats and vulnerabilities.
- **Data anonymisation and pseudonymisation:** Removing or encrypting personally identifiable information to minimise the risk associated with data breaches.
- Compliance with relevant regulations: Adherence to data protection laws such as GDPR or HIPAA, depending on the nature of the data being handled.
- **Disaster recovery and backup procedures:** Implementing protocols to ensure data integrity and availability in the event of system failures or breaches.
- **Secure coding practices:** Following best practices in software development to mitigate security risks such as SQL injection, cross-site scripting, etc.
- Regular employee training: Educating employees about security protocols and best practices to prevent social engineering attacks or inadvertent data breaches.

6. User Rights:

• What rights do users have regarding their data?

 Users have the right to access, rectify, or delete their personal data that is stored in our database, which includes their login credentials (full name and date of birth).
 Additionally, users have the right to restrict processing and the right to data portability. Since login credentials are temporary and expire two weeks after the user's associated summer school booking end date, any stored data will be automatically deleted after this period.

• How can users exercise these rights?

Users can exercise their rights by contacting their group leader or the organisation
that facilitated their access to the app. Alternatively, they can reach out directly to our
support team via email at plus@plus-ed.com. We will respond to requests within a
reasonable timeframe and assist users in accessing, rectifying, or deleting their data



as requested. Given that users do not create accounts themselves, these requests will be managed through the group leaders or the associated organisation.

7. Third-Party Services:

- Does the app use any third-party services (e.g., analytics providers, payment processors, advertising networks)?
 - No, the app does not use any third-party services such as analytics providers, payment processors, or advertising networks. The app operates independently and does not share user data with any external services or providers.

8. Cookies and Tracking:

- Does the app use cookies or other tracking technologies?
 - No, the app does not use cookies or any other tracking technologies. We do not track
 user activity within the app or collect any data through tracking mechanisms. The app
 is designed to provide a secure and private experience without monitoring user
 behaviour.

9. Children's Privacy:

- Is the app intended for use by children? If so, what measures are in place to protect children's privacy?
 - Yes, the app is intended for use by users of all ages, including children. We take children's privacy seriously and adhere to the EU General Data Protection Regulation (GDPR) for children's data protection. For users under the age of 16, we require parental consent before collecting any personal data. The app does not contain ads or any messaging features, ensuring a safe environment free from unwanted communication and exposure to other users' information. Parents can contact us to access, modify, or delete their child's personal information.

10. Policy Updates:

- How will users be informed of changes to the privacy policy?
 - Any updates to the privacy policy will be communicated directly within the app upon first login. Users will be prompted to review and accept the updated privacy policy before they can continue using the app. Additionally, the most current version of the privacy policy will always be available on our website. New users are encouraged to review the privacy policy the first time they access the app.

11. Contact Information:

- How can users contact you with questions or concerns about the privacy policy?
 - Users can contact us with any questions or concerns about the privacy policy via email at plus@plus-ed.com. Our support team is available to assist with any inquiries related to data privacy and user rights. We are committed to addressing any concerns promptly and ensuring the privacy and security of our users' information.