

CAMPUSCONNECT: PRIVACY AND SECURITY POLICY

Please read this policy carefully before using CampusConnect Services

Here at CampusConnect we care about protecting your data and we respect your privacy rights. We will ensure compliance with the following privacy policy when processing personal data on behalf of the university which you are attending as a current exchange student, or as a prospective exchange student considering or planning an exchange programme.

You should also note that by using CampusConnect, we are processing data on behalf of your university and you are also subject to your university Terms and Conditions. You should read your university Terms and conditions of use as well as reading this Privacy Policy. If there is a conflict between the your university Terms and conditions and this Privacy Policy, then your university Terms and conditions will have priority

By providing your consent at registration on CampusConnect, you permit the collection and use of your personal information as described in this this Privacy Policy and you agree with this Privacy Policy **(last updated on 15/11/2018)**.

If you do not agree with the terms of this Privacy Policy, you should not use CampusConnect and should not create a CampusConnect account.

1 ABOUT OUR PRIVACY POLICY

- 1.1 The mobile app called CampusConnect can be downloaded and/or accessed from the following domain name (**exchange.mycampusconnect.ie**) ("CampusConnect Exchange")
- 1.2 CampusConnect is hosted, managed, supported and developed by StudyBundles Limited, registered in Ireland, a limited liability company with registered number 560434 ("StudyBundles"), its service providers or any of their respective subcontractors and any use of your personal data or content by StudyBundles, its service providers or any of their respective subcontractors in hosting, managing, supporting and developing CampusConnect is carried out on behalf of your home university.

- 1.3 Our Privacy Policy sets out the basis on which we process and use any personal data we collect from you or that is provided to us as a result of you registering on, downloading or otherwise using CampusConnect.
- 1.4 Please read this Privacy Policy carefully to understand our views and practices regarding your personal data and how we will treat it. The terms “CampusConnect Profile”, “Public Profile” and “Contract” are defined in paragraph 2.3 and 2.4 and are used throughout this Policy. Certain functionality is available at the moment on CampusConnect and certain functionality may be available in the future. When some or all of the functionality that is envisaged as being available in the future (but is not yet available) is referred to, we have indicated this by using the phrase “where the functionality is available at the time”.

2. INFORMATION THAT YOU PROVIDE TO US

- 2.1 When registering as a user of CampusConnect or during your time as a user of CampusConnect you will be asked to provide information to us. We will inform you at the time of collecting information from you whether you must provide the information to use CampusConnect or whether the provision of information requested by us is optional.
- 2.2 We may choose to verify some of the information that you give us when requesting an invitation to use CampusConnect, when registering as a user of CampusConnect or when using CampusConnect.
- 2.3 Information that you choose to provide to us, including

Prospective exchange students: your Profile picture and fields labelled as About me, Type of student (indicating that you are a prospective exchange student), Area of study, Start date, Host country/city/institution, and Interests will be visible on the profile that may be viewed only by other registered users of CampusConnect (your “**CampusConnect Profile**”).

Current exchange students (“Buddies”): your Profile picture and fields labelled as About me, Type of student (indicating that you are a current exchange student), Area of study, Start date, Host country/city/institution, and Interests will be visible on the profile that may be viewed only by other

registered users of CampusConnect (your “**CampusConnect Profile**”).

You will have the opportunity to publish, review and edit your Profile, which is visible to all registered users of CampusConnect (your “**Public Profile**”).

2.4 **INFORMATION THAT WE COLLECT ABOUT YOU**

- 2.4.1 if you contact us, we may keep a record of that correspondence;
- 2.4.2 information that you submit when you register as a user of CampusConnect, which may include, but is not limited to, your name, area of study, exchange host country, exchange host city, exchange host university/college, nationality, start date, end date, interests, and travel information;
- 2.4.3 text, sound, images and information that you submit or upload when you use CampusConnect such as username, name, photographs, geographic location, email address, biography, personal preferences, comments, private messages, feedback sounds, video footage, graphics, quotes, text, images, content and other material (including any personally identifiable information) (whether created alone or jointly with other users, or automatically by your Device or through cookies), in various formats on CampusConnect (information in Section 2.4.2 and 2.4.3 being “Content”);
- 2.4.4 the App Channel and/or Device you use to access CampusConnect; and
- 2.4.5 details of your visits to CampusConnect including, but not limited to, traffic data, location data, weblogs and other communication data.

2.5 Where the functionality is available, we may make CampusConnect available for download via a number of channels, including websites, app stores, shops and markets (e.g. the Apple Inc. App Store and Google Inc.’s Google Play) which StudyBundles decides upon from time to time (each an “App Channel”) operated by third parties (each an “App Channel Operator”)

3 INFORMATION ABOUT YOU WE RECEIVE FROM OTHER SOURCES

- 3.1 While you are using a version CampusConnect downloaded from an App Channel, and while that app is installed on a device that you use to access CampusConnect ("Device"), we and/or the App Channel Operator may use cookies or other technology to collect and process the following information about you, and we may have access to that information:
 - 3.1.1 information on your patterns of use of CampusConnect, such as how long you use it for, how often you use it and what you do or click when you are using it;
 - 3.1.2 information on content accessed on CampusConnect each time you use it;
 - 3.1.3 your location when you are downloading and using CampusConnect;
 - 3.1.4 information about your Device, including (where available) your IP address, alphanumeric IDs, operating system, browser type, information regarding the volume and status of data transmission, clickthrough statistics, the name of the domain and host from which you access the internet and the date and time you access portions of CampusConnect; and
- 3.2 We have no control over an App Channel Operator's collection or use of information, in most cases, and cannot change what information is made available to us by an App Channel Operator by virtue of your or our use of the App Channel.
- 3.3 Your personal data is gathered:
 - 3.3.1 when you provide it to us or the App Channel Operator;
 - 3.3.2 through use of cookies by an App Channel Operator; as far as we know, the App Channel Operator cookies do not collect any information from your Device that is not related to the download or use of CampusConnect; and
 - 3.3.3 through use of cookies by us placed by the App Channel Operator on the Device.

- 3.4 You may refuse to accept these App Channel Operator cookies by activating the setting on your Device which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access or use certain aspects of CampusConnect. Unless you have adjusted your Device settings so that it will refuse cookies, we will use cookies when you open CampusConnect. See Section 10 below (IP Addresses and Cookies) for further information on Cookies used by us.

4. **USES MADE OF YOUR INFORMATION & JUSTIFICATION OF USE**

- 4.1. CampusConnect provides registered users of CampusConnect who are also exchange students, or current students considering or planning an exchange programme, with guidance, information, opportunities for social networking, and serves as a planning tool for users in preparation for their exchange.
- 4.2. As a user you will partake in CampusConnect, in each case where the functionality is available at the time, by:
- 4.2.1 creating and maintaining your CampusConnect Profile;
 - 4.2.2 creating and maintaining Public Profile comprising the personal information and other Content about you which you choose to make available on CampusConnect, so that users are able to identify you and interact with you;
 - 4.2.3 publishing, writing, creating, uploading, sharing, changing, editing, saving and browsing Content;
 - 4.2.4 changing, editing and reviewing your CampusConnect Profile (including Public Profile) and Content which you have created and uploaded to CampusConnect ;
 - 4.2.5 interacting with other exchange users and your university on CampusConnect, including by exchanging private messages and other content with other users or us using CampusConnect;
 - 4.2.6 sending feedback in relation to CampusConnect to us;

4.2.7 posting content in comments on CampusConnect

4.2.8 participating in surveys, web polls and other content creation on CampusConnect as well as in any other activity that results in the ranking, rating, classification, categorisation and evaluation of content made available on CampusConnect, including your Content.

4.3. Where the functionality is available at the time, you agree that all content on your Public Profile CampusConnect may be accessed, read and saved by other registered users of CampusConnect, by us, your university.

4.4. We use information that we have access to about you, or that you give to us, in the following ways:

4.4.1 to refine and improve CampusConnect and to deliver to you and other users a quality service;

4.4.2 to gain insight into how exchange student use CampusConnect so that we can make improvements to its usability and your universities student exchange practices and strategies in the future;

4.4.3 to balance traffic on CampusConnect to ensure our users receive a consistent and reliable service;

4.4.4 to provide you with information regarding your exchange programme which we feel may interest you by displaying this information on CampusConnect;

4.4.5 to comply with our legal obligations;

4.4.6 to allow you to access CampusConnect and to participate in interactive features of our service when you choose to do so; and

4.4.7 to notify you about changes to our services including CampusConnect.

- 4.5. You agree that Content that you have included in in your Public Profile, in your comments and feedback and in any other Content you submit on public or user accessible sections of the CampusConnect will be accessible to us and may be accessible to other registered users of CampusConnect.
- 4.6. Where the functionality is available at the time, other users of CampusConnect that you are connected to ("**Linked Users**"), like, for example, those you follow, send messages to or interact with on CampusConnect, or those you are followed by or messaged by can see some of your Content, provided this information has been made visible by you through settings of the user interface on CampusConnect from time to time. Your username may be used when you send a private message, Content or other content to another user.
- 4.7. Except as set out in this Privacy Policy, we do not sell, rent, share, trade or give away any of your personal information or your Content.
- 4.8. We may also use your email address and other contact details which you provide to us to contact you regarding CampusConnect, but you may choose not to receive emails of this type or messages of this type by contacting us at support@campusconnect.ie
- 4.9. Where the functionality is available at the time, we may use your content to personalise CampusConnect for your use, including to identify materials or users that we think might interest you. For example, we may place information that is relevant to the exchange destination you are considering registered on your CampusConnect Profile so that it is visible to you when you log into CampusConnect.

5. **YOUR RIGHTS**

- 5.1. Under the General Data Protection Regulation (EU) 2017/676, you have various rights in relation to your personal data. All of these rights can be exercised by contacting the University as the data controller or by contacting us at support@campusconnect.ie
- 5.2. You have the following rights in relation to your personal data

- 5.2.1 You have the right to access personal data held by us and the University
- 5.2.2 You have the right to rectify any details to ensure that your personal information is accurate
- 5.2.3 You have the right to erasure / 'right to be forgotten'
- 5.2.4 You have the right to ask us or your university to stop processing your personal data at any time in certain circumstances
- 5.2.5 You have the right to request that the University and CampusConnect provides you with a copy of all of your personal data and to transmit your personal data to another data controller in a structured, commonly used and machine-readable format
- 5.2.6 You have the right to lodge a complaint to a supervisory authority such as the data protection commission in Ireland or the Information Commissioner's Office in the UK

6. **DISCLOSURE OF YOUR INFORMATION TO OTHER PEOPLE**

- 6.1. We do not disclose to any third party personal information about you unless we have your permission (including as given in this Privacy Policy), you have asked us to do so (for example by sending another user a private message) or we believe the law permits or requires it.
- 6.2. You understand and agree that we may disclose your personal information to the following third parties:
 - 6.2.1 CampusConnect service providers and/or sub-contractors (including in use in cloud computing and/or distributed content storage and delivery systems) for the purposes of hosting, managing, supporting and developing CampusConnect;
 - 6.2.2 any other service providers of your university relating to or in connection with CampusConnect;

6.2.3 our professional advisors (e.g. lawyers, tax advisors);

6.2.4 any prospective seller or buyer of any business or assets of CampusConnect

6.2.5 to protect the rights, property or safety of your university, this includes exchanging information with third parties for the purposes of obtaining insurance, cyber security assistance and risk reduction.

6.3. If there is specific functionality on CampusConnect to deal with disclosure of data, we will tell you when information about you may be provided to third parties by us in ways other than those explained above; you will have the option to prevent such information sharing at the time that we tell you.

6.4. The personal data that we collect from you is processed and stored on our secure computing devices in the UK & Ireland, or those of our hosting partner

Sub-processor	Purpose	Country
Digital Ocean	Cloud service provider for data storage	United Kingdom
Uploadcare	Image hosting service	USA
Mailgun	Email delivery service	USA

7. TIPS AND WARNING

- 7.1. The use by you of CampusConnect is at your sole risk.
- 7.2. From time to time software providers are the target of third parties acting illegally and masquerading as legitimate entities. If you are in doubt about the authenticity of any source of any communication purporting to be from CampusConnect, please let us know by contacting us at the following details support@campusconnect.ie
- 7.3. CampusConnect may, from time to time, contain links to and from the websites of student organisations, charities, government agencies, other educational bodies with which we have some association or with which we have no association. If you follow a link to any of these websites, please note that these website operators have their own terms and conditions and/or privacy policies and that we do not accept any responsibility or liability for these terms and conditions, policies or for the activities on those websites. The fact that we link to a third party website not an endorsement, authorisation or representation of our affiliation with that third party.

8. MINORS

- 8.1. We do not knowingly collect or hold information about children under the age of 18. If we become aware that a child under the age of 18 has provided us with personal information, we will take steps to either delete it as soon as possible or to ensure that the child has the consent of an appropriate adult to download CampusConnect. If a parent or guardian becomes aware that a child (a person under the age of 18) has provided us with personal information without their consent, please contact us on support@campusconnect.ie.

9. SECURITY AND CONTROL OF YOUR PERSONAL DATA

- 9.1. We will take steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.
- 9.2. Your passwords are stored on CampusConnect servers in encrypted form. We do not disclose your account details to anyone except when legally required to do so. It is your

responsibility to keep your password secure. Do not share your password with anyone. You are responsible for the security of your password.

- 9.3. You should be aware that when you voluntarily disclose personally identifiable information and agree to make that information public on CampusConnect via your Public Profile, Content, in private messages or in other areas of CampusConnect that information can be collected, correlated and used by third parties outside of our control. These third parties or other CampusConnect users may use your information to send you unsolicited messages, and such activities are beyond our control. Please do not post any personal information on CampusConnect, especially in your Public Profile or in other public areas that you wish to keep private.
- 9.4. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, for example, by forcing HTTPS connections when you submit or amend your password or by terminating user sessions when you have not used CampusConnect for an extended period of time, we cannot guarantee the security of your Content transmitted to CampusConnect; any transmission is at your own risk. Once we have received your Content, we will use strict procedures and security features to try to prevent unauthorised access. ***You acknowledge that we are not responsible for any intercepted Content sent by you or to you via the internet, and you hereby release us from any and all claims arising out of or related to the use of intercepted Content in any unauthorised manner.***

10. IP ADDRESSES AND COOKIES

- 10.1. We may collect information about your Device, including (where available) your IP address, geographic location, alphanumeric IDs, operating system, browser type, information regarding the volume and status of data transmission, click through statistics, the name of the domain and host from which you access the internet and the date and time you access portions of CampusConnect, for system administration and statistical purposes. This is statistical data about our users' browsing actions and patterns, and we do not use them to identify any individual, except if required by the law.

- 10.2. Cookies contain information that is transferred to your Device. On revisiting CampusConnect our computer server will recognise the cookie, giving us information about your last visit. The cookies we use help us to improve CampusConnect and to deliver a better and more personalised service. They enable us:
- 10.2.1 to allow you to enter CampusConnect without explicitly typing in your user name and password every time;
 - 10.2.2 to estimate our audience size and usage pattern;
 - 10.2.3 to store information about your preferences, and so allow us to customise CampusConnect according to your individual interests; and
 - 10.2.4 to speed up your use of the CampusConnect and searches.
- 10.3. You may refuse to accept cookies by activating the setting on your browser or Device which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access or use certain aspects of CampusConnect. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to CampusConnect. For information on how to control your cookies go to www.allaboutcookies.org.
- 10.4. Please see section 3 of this Privacy Policy also, which deals with App Channel Operator cookies.
11. **ACCESS TO INFORMATION AND UPDATING, VERIFYING AND DELETING PERSONAL DATA**
- 11.1. At any time, you can make a request to have access to all the personal information that we hold about you. To do so please email support@campusconnect.ie
 - 11.2. As a registered user of CampusConnect, you can modify or update your personal information on CampusConnect at any time by accessing the Profile Settings or by contacting us at support@campusconnect.ie.

- 11.3. If you choose to terminate your CampusConnect Profile, you should contact us at info@campusconnect.ie giving us clear instructions to terminate your account. If you choose to terminate CampusConnect Profile, your Public Profile, CampusConnect Profile and the messages you initiated will be deleted. Other Content, including but not limited to, your Content, content you have ranked, rated or syndicated in any way, messages you have exchanged with other users which have been turned into Content, feedback, other Content and/or redflag submissions, will not be removed from CampusConnect. However, we will use reasonable commercial endeavours to ensure that none of your personal information continues to be displayed on CampusConnect except to comply with our legal obligations (including crediting you as the author of your Content)].
- 11.4. Once your account is terminated or deactivated, we shall delete the personal data relating to your account within 30 days.
- 11.5. You can modify, update or delete your inaccurate personal information at any time by contacting us at support@campusconnect.ie

12. **CHANGES TO OUR PRIVACY POLICY**

- 12.1. 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 email or notifications. We therefore encourage you to review the Website from time to time to stay informed of how we are processing your information.

13. **USER FEEDBACK AND COMPLAINTS**

- 13.1. We welcome questions, comments and requests regarding this Privacy Policy. These should be addressed to support@campusconnect.ie or by post to