

ULSTER UNIVERSITY: PRIVACY AND SECURITY POLICY FOR ULSTER UNIVERSITY CAMPUSCONNECT

Here at Ulster University we care about your privacy and we respect your privacy rights.

By providing your consent at registration on Ulster University CampusConnect, you permit the 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 07/06/2018**).

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

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

1 ABOUT OUR PRIVACY POLICY

- 1.1 The mobile app called Ulster University CampusConnect which can be downloaded and/or accessed from the following domain name <https://uu.mycampusconnect.ie/download> ("Ulster University CampusConnect"), is controlled by Ulster University", "we", "us" and "our".
- 1.2 The Ulster University Campus connect 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 Ulster University CampusConnect is carried out on our behalf.
- 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 Ulster University 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 “Ulster University 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 in Ulster University 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 HOW WE COLLECT INFORMATION ON ULSTER UNIVERSITY CAMPUSCONNECT

2.1 When registering as a user of Ulster University CampusConnect or during your time as a user of Ulster University 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 Ulster University 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 Ulster University CampusConnect, when registering as a user of Ulster University CampusConnect or when using Ulster University CampusConnect.

2.3 We will inform you at the time of collecting information from you when the information that you provide to us will be accessible by other users of Ulster University CampusConnect or by third parties so that you can decide whether to provide the information to us. All information that you choose to provide to us, other than fields labelled as Avatar, Bio, Course details, Campus, Subject area, Start date, and Interests will be visible on the profile that may be viewed only by registered users of Ulster University CampusConnect (your “**Ulster University CampusConnect Profile**”). You will have the opportunity to publish and preview the public profile which is visible to all non registered, anonymous users of Ulster University CampusConnect (your “**Public Profile**”) and to edit Ulster University the display settings for your Public Profile.

2.4 You agree that we may collect and process the following data 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 Ulster University CampusConnect, which may include, but is not limited to, your name, course name at Ulster University, course type, student number, nationality, start date, academic interests, social interests, performance and engagement data and travel information;

2.4.3 text, sound, images and information that you submit or upload when you use Ulster University 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 Ulster University 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 Ulster University CampusConnect;
and

2.4.5 details of your visits to Ulster University 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 Ulster University 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 RECEIVED THROUGH VARIOUS APP CHANNELS

3.1 While you are using a version of Ulster University CampusConnect downloaded from an App

Channel, and while that app is installed on a device that you use to access the Ulster University 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 Ulster University 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 the number of pages and videos of Ulster University CampusConnect viewed each time you use it;

3.1.3 your location when you are downloading and using the Ulster University 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 Ulster University CampusConnect; and

3.1.5 what other StudyBundles managed apps you have installed on your Device.

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:

3.1.1 when you provide it to us or the App Channel Operator;

3.1.2 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 Ulster University CampusConnect; and

3.1.3 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 Ulster University CampusConnect. Unless you have adjusted your Device settings so that it will refuse cookies, we will use cookies when you open Ulster University CampusConnect. See Section 10 below (IP Addresses and Cookies) for further information on Cookies used by us.

4 USES MADE OF THE INFORMATION

4.1.1 Ulster University CampusConnect provides registered users of Ulster University CampusConnect who are also entrants or prospective entrants to Ulster University (each a "user") with guidance, information, opportunities for skills development and social networking opportunities, and serves as a planning tool for users in preparation for enrolment at Ulster University and a resource guide once they enter the Ulster University.

4.2 As a user you will partake in the Ulster University CampusConnect, in each case where the functionality is available at the time, by:

4.2.1 creating and maintaining your Ulster University 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 Ulster University 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 Ulster University CampusConnect Profile (including Public Profile) and Content which you have created and uploaded to Ulster University CampusConnect ;

- 4.2.5 interacting with other users and with us on Ulster University CampusConnect, including by exchanging private messages and other Content with other users or us using Ulster University CampusConnect;
 - 4.2.6 sending feedback in relation to Ulster University CampusConnect to us;
 - 4.2.7 posting Content in comments on Ulster University CampusConnect where the functionality is available; and
 - 4.2.8 participating in surveys, web polls and other Content creation on Ulster University CampusConnect as well as in any other activity that results in the ranking, rating, classification, categorisation and evaluation of content made available on Ulster University CampusConnect, including your Content.
- 4.3 Where the functionality is available at the time, you agree that all Content on your Public Profile Ulster University CampusConnect may be accessed, read and saved by other registered users of Ulster University CampusConnect, by us, StudyBundles and any of Ulster University's or StudyBundles' respective service providers and sub-contractors. We can allow you to search for other registered users of Ulster University CampusConnect.
- 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 Ulster University CampusConnect and to deliver to you and other users a good service;
 - 4.4.2 to gain insight into how students and prospective students use Ulster University CampusConnect so that we can make improvements to its usability and to Dublin Institute of Technology's enrolment strategy and student engagement actions in the future;
 - 4.4.3 to balance traffic on Ulster University CampusConnect to ensure our users receive

a consistent and reliable service;

4.4.4 to conduct research on and analysis of on our communication and marketing practices and our interactions with you, with a view to improving our enrolment processes, student services, pre-enrolment interactions with students and prospective students and information services;

4.4.5 to provide you with information regarding Ulster University which we feel may interest you by displaying this information on Ulster University CampusConnect;

4.4.6 to comply with our legal obligations;

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

4.4.8 to notify you about changes to our services including Ulster University 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 Ulster University CampusConnect will be accessible to us and may be accessible to other registered users of Ulster University CampusConnect except, in the case of users, where you have deliberately used the functionality on Ulster University CampusConnect to hide that Content.

4.6 Where the functionality is available at the time, other users of Ulster University CampusConnect that you are connected to ("**Linked Users**"), like, for example, those you follow, send messages to or interact with on Ulster University 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 the Ulster University 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 Ulster University CampusConnect, but you may choose not to receive emails of this type or messages of this type by contacting us at global@ulster.ac.uk.
- 4.9 Where the functionality is available at the time, additionally, we may contact you using your email address or to notify you that another user have sent you a private message and/or to inform you that someone wants to add you as a friend or that they want to contact you. In order to allow you to send and receive private messages to and from other registered users of Ulster University CampusConnect, we record the messages that you send and receive using Ulster University CampusConnect private messaging feature.
- 4.10 Where the functionality is available at the time, we may use your Content to personalise Ulster University 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 course that you registered on your Ulster University CampusConnect Profile so that it is visible to you when you log into the Ulster University CampusConnect.

5 DISCLOSURE OF YOUR INFORMATION TO OTHER PEOPLE

- 5.1 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.
- 5.2 You understand and agree that we may disclose your personal information to the following third parties:
 - 5.2.1 StudyBundles, their 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 Ulster University CampusConnect;

- 5.2.2 any other service providers of Ulster University in connection with or for the purpose of any application to be used by Ulster University in addition to or as a replacement of Ulster University CampusConnect but having substantially the same objectives as Ulster University CampusConnect or any of the service providers or subcontractors of Ulster University service providers for the purpose of hosting, managing, supporting and developing any such application;
 - 5.2.3 any other service providers of Ulster University relating to or in connection with Ulster University CampusConnect;
 - 5.2.4 our professional advisors (e.g. lawyers, tax advisors);
 - 5.2.5 any prospective seller or buyer of any business or assets of Ulster University CampusConnect, StudyBundles, its service providers or subcontractors, the Ulster University or its service providers or subcontractors;
 - 5.2.6 to protect the rights, property or safety of Ulster University; this includes exchanging information with third parties for the purposes of obtaining insurance, cyber security assistance and risk reduction.
- 5.3 If there is specific functionality on Ulster University 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.
- 5.4 We do not disclose personal information about you to third parties unless you have consented to that disclosure in accordance with this section 5 of the Privacy Policy, but we may provide third parties with aggregate anonymised information about users of Ulster University CampusConnect. For example, we may inform them that 500 men aged under 23 who interacted with specific content on the Ulster University CampusConnect finished their courses at Ulster University with honours degrees, or we might inform third parties regarding the number of unique users who visit Ulster University CampusConnect during a particular period. By using Ulster University CampusConnect you agree to these practices. We also

provide reports to third party search engines and mapping service providers which may include aggregate anonymised information about Ulster University CampusConnect users.

6 OVERSEAS TRANSFERS

- 6.1 It may be necessary to transfer your personal information to StudyBundles or to their service providers located in countries outside of the European Economic Area (EEA). This may happen where our servers, the servers of StudyBundles, or its suppliers and service providers are based outside of the EEA, or where you use Ulster University CampusConnect while visiting countries outside of the EEA. The data protection and other laws of countries outside the EEA may not be as comprehensive as those in Ireland or the EU. We will only transfer data to countries out the EEA in circumstances where we are permitted by law or have abided by any applicable Irish and EU requirements in order to allow us to make the transfer. If under applicable law, we require your consent to permit the transfer, we will ensure adequate safeguards are in place in respect of any data to be transferred. You consent to us transferring your personal data outside the EEA on that basis.

7 TIPS AND WARNING

- 7.1 The use by you of Ulster University 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 Ulster University CampusConnect, please let us know by contacting Ulster University at the following details **global@ulster.ac.uk**
- 7.3 Ulster University 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 Ulster University 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 **global@ulster.ac.uk**.

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 Where we have given you (or where you have chosen) a password which enables you to access certain parts of Ulster University CampusConnect, you are responsible for keeping this password confidential. 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 Ulster University CampusConnect via your Public Profile, Content, in private messages or in other areas of Ulster University CampusConnect that information can be collected, correlated and used by third parties outside of our control. These third parties or other Ulster University 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 Ulster University 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 Ulster University CampusConnect for an extended period of time, we cannot guarantee the security of your Content transmitted to Ulster University 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 Ulster University 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 Ulster University CampusConnect our computer server will recognise the cookie, giving us information about your last visit. The cookies we use help us to improve Ulster University CampusConnect and to deliver a better and more personalised service. They enable us:
 - 10.2.1 to allow you to enter Ulster University 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 Ulster University CampusConnect according to your individual interests; and
 - 10.2.4 to speed up your use of the Ulster University 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 Ulster University CampusConnect. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to Ulster University 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 written request to have access to all the personal information that we hold about you. We will provide this information to you and may request a small administrative charge.
- 11.2 As a registered user of Ulster University CampusConnect, you can modify or update your personal information on Ulster University CampusConnect at any time by accessing the Profile Settings or by contacting us at **global@ulster.ac.uk**.
- 11.3 If you choose to terminate your Ulster University CampusConnect Profile, you should contact us at **global@ulster.ac.uk** giving us clear instructions to terminate your account. If you choose to terminate Ulster University CampusConnect Profile, your Public Profile, Ulster University 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 Ulster University CampusConnect. However, we will use reasonable commercial endeavours to ensure that none of your personal information continues to be displayed on Ulster University CampusConnect except to comply with our legal obligations (including crediting you as the author of your Content)].

11.4 You can modify, update or delete your inaccurate personal information at any time by contacting us at **global@ulster.ac.uk**.

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. You should visit this page periodically to review any changes to the Privacy Policy.

13 USER FEEDBACK AND COMPLAINTS

13.1 We welcome questions, comments and requests regarding this Privacy Policy. These should be addressed to **global@ulster.ac.uk** or by post to Ulster University Shore Road, Newtownabbey Co. Antrim BT37 0QB