DIT: PRIVACY AND SECURITY POLICY FOR DIT CAMPUSCONNECT

Here at Dublin Institute of Technology we care about your privacy and we respect your privacy rights.

By using DIT 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 11/10/2017**).

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

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

1   ABOUT OUR PRIVACY POLICY

1.1   The web and mobile app called DIT CampusConnect which can be downloaded and/or accessed from the following domain name or any webpage containing the domain dit.mycampusconnect.ie ("DIT CampusConnect"), is controlled by Dublin Institute of Technology", "we", "us" and "our".

1.2   The DIT CampusConnect 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 DIT 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 DIT 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 "DIT 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 DIT 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 DIT CAMPUSCONNECT

2.1   When registering as a user of DIT CampusConnect or during your time as a user of DIT 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 DIT 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 DIT CampusConnect, when registering as a user of DIT CampusConnect or when using DIT 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 DIT 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, Area of study, Type of student, Start date, and Nationality will be visible on the profile that may be viewed only by registered users of DIT CampusConnect (your "**DIT CampusConnect Profile**"). You will have the opportunity to publish and preview the public profile which is visible to all non registered, anonymous users of DIT CampusConnect (your "**Public Profile**") and to edit 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 DIT CampusConnect, which may include, but is not limited to, your name, course name at DIT, 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 DIT 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 DIT 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 DIT CampusConnect; and

2.4.5   details of your visits to DIT 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 DIT 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 DIT CampusConnect downloaded from an App Channel, and while that app is installed on a device that you use to access the DIT 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 DIT 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 DIT CampusConnect viewed each time you use it;

3.1.3   your location when you are downloading and using the DIT 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 DIT 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 DIT 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 DIT CampusConnect. Unless you have adjusted your Device settings so that it will refuse cookies, we will use cookies when you open DIT 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   DIT CampusConnect provides registered users of DIT CampusConnect who are also entrants or prospective entrants to Dublin Institute of Technology (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 Dublin Institute of Technology and a resource guide once they enter the DIT.

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

4.2.1   creating and maintaining your DIT 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 DIT 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 DIT Campus Connect Profile (including Public Profile) and Content which you have created and uploaded to DIT CampusConnect ;

4.2.5   interacting with other users and with us on DIT CampusConnect, including by exchanging private messages and other Content with other users or us using DIT CampusConnect;

4.2.6   sending feedback in relation to DIT CampusConnect to us;

4.2.7   posting Content in comments on DIT CampusConnect where the functionality is available; and

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

4.3   Where the functionality is available at the time, you agree that all Content on your Public Profile DIT CampusConnect may be accessed, read and saved by other registered users of DIT CampusConnect, by us, StudyBundles and any of Dublin Institute of Technology's or StudyBundles' respective service providers and sub-contractors. We can allow you to search for other registered users of DIT 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 DIT 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 DIT CampusConnect so that we can make improvements to its usability and to Dublin Insitute of Technology's enrolment strategy and student engagement actions in the future;

4.4.3   to balance traffic on DIT 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, preenrolment interactions with students and prospective students and information services;

4.4.5 to provide you with information regarding Dublin Institute of Technology which we feel may interest you by displaying this information on DIT CampusConnect;

4.4.6 to comply with our legal obligations;

4.4.7 to allow you to access DIT 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 DIT 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 DIT CampusConnect will be accessible to us and may be accessible to other registered users of DIT CampusConnect except, in the case of users, where you have deliberately used the functionality on DIT CampusConnect to hide that Content.

4.6 Where the functionality is available at the time, other users of DIT CampusConnect that you are connected to ("**Linked Users**"), like, for example, those you follow, send messages to or interact with on DIT 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 DIT 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 DIT CampusConnect, but you may choose not to receive emails of this type or messages of this type by contacting us at [*Insert Email (Negotiated with Client)*].

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 DIT CampusConnect, we record the messages that you send and receive using DIT CampusConnect private messaging feature.

4.10 Where the functionality is available at the time, we may use your Content to personalise DIT 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 DIT CampusConnect Profile so that it is visible to you when you log into the DIT 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 DIT CampusConnect;

5.2.2   any other service providers of Dublin Institute of Technology in connection with or for the purpose of any application to be used by Dublin Institute of Technology in addition to or as a replacement of DIT CampusConnect but having substantially the same objectives as DIT CampusConnect or any of the service providers or subcontractors of Dublin Institute of Technology service providers for the purpose of hosting, managing, supporting and developing any such application;

5.2.3   any other service providers of Dublin Institute of Technology relating to or in connection with DIT 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 DIT CampusConnect, StudyBundles, its service providers or subcontractors, the Dublin Institute of Technology or its service providers or subcontractors;

5.2.6   to protect the rights, property or safety of Dublin Institute of Technology; 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 DIT 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 DIT CampusConnect. For example, we may inform them that 500 men aged under 23 who interacted with specific content on the DIT CampusConnect finished their courses at Dublin Institute of Technology with honours degrees, or we might inform third parties regarding the

number of unique users who visit DIT CampusConnect during a particular period. By using DIT 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 DIT 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 DIT 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 DIT 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 DIT CampusConnect, please let us know by contacting Dublin Institute of Technology at the following details **[*Details (Negotiated with Client)*]**

7.3   DIT 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 DIT 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 **[Insert Contact Details *(Negotiated with Client)*]]**.

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 DIT 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 DIT CampusConnect via your Public Profile, Content, in private messages or in other areas of DIT CampusConnect that information can be collected, correlated and used by third parties outside of our control. These third parties or other DIT 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 DIT 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 DIT CampusConnect for an extended period of time, we cannot guarantee the security of your Content transmitted to DIT 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, clickthrough statistics, the name of the domain and host from which you access the internet and the date and time you access portions of DIT 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 DIT CampusConnect our computer server will recognise the cookie, giving us information about your last visit. The cookies we use help us to improve DIT CampusConnect and to deliver a better and more personalised service. They enable us:

       10.2.1   to allow you to enter DIT 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 DIT CampusConnect according to your individual interests; and

10.2.4   to speed up your use of the DIT 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 DIT CampusConnect. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to DIT 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 DIT CampusConnect, you can modify or update your personal information on DIT CampusConnect) at any time by accessing the Profile Settings or by contacting us at admissions@dit.ie.

11.3   If you choose to terminate your DIT CampusConnect Profile, you should contact us at admissions@dit.ie giving us clear instructions to terminate your account. If you choose to terminate DIT CampusConnect Profile, your Public Profile, DIT 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 DIT CampusConnect. However, we will use reasonable commercial endeavours to ensure that none of your personal information continues to be displayed on DIT 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 admissions@dit.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. 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 admissions@dit.ie or by post to Dublin Institute of Technology, Aungier St, Dublin 2