

# PRIVACY POLICY

## [RECOVERIVER]

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[Manchester Metropolitan University, RecoveRiver Project Team]

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**Manchester Metropolitan University, RecoveRiver Project Team** (“we”, “us” or “Research Team” or “our”) respects the privacy of our users (“user” or “you”). This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our mobile application (the “Application” or “Service”). Please read this Privacy Policy carefully. IF YOU DO NOT AGREE WITH THE TERMS OF THIS PRIVACY POLICY, PLEASE DO NOT ACCESS THE APPLICATION.

We reserve the right to make changes to this Privacy Policy at any time and for any reason. We will alert you about any changes by updating the “Last updated” date of this Privacy Policy. You are encouraged to periodically review this Privacy Policy to stay informed of updates. You will be deemed to have been made aware of, will be subject to, and will be deemed to have accepted the changes in any revised Privacy Policy by your continued use of the Application after the date such revised Privacy Policy is posted.

This Privacy Policy does not apply to the third-party online/mobile store from which you install the Application or make payments, including any virtual items, which may also collect and use data about you. We are not responsible for any of the data collected by any such third party.

## COLLECTION OF YOUR INFORMATION

We may collect information about you in a variety of ways. The information we may collect via the Application depends on the content and materials you use, and includes:

### Personal Data

Demographic and other personally identifiable information (such as your email address) that you voluntarily give to us when choosing to use the Application and participate in various activities related to the Application such as responding to surveys, filling in the questionnaires or diaries. If you choose to share data about yourself via your profile, or other interactive areas of the Application, please be advised that all data you disclose in these areas is private and your data will not be accessible to anyone outside the research team.

No personal information is gathered from the application by default. However, a cloud data storage system is used by the Service by default, therefore, any data you provide inside the Application will be automatically uploaded to the cloud.

Your entries will be securely uploaded to a Realtime database managed by Firebase. All data within the database will be encrypted to provide data security. Remember that no method of information exchange is 100% secure and reliable, hence we cannot guarantee absolute security.

### Derivative Data

Information our servers automatically collect when you access the Application, such as your native actions that are integral to the Application, including responding to questions, updating information, or writing a diary, as well as other interactions with the Application via server log files.

## USE OF YOUR INFORMATION

Having accurate information about you permits us to provide you with a smooth, efficient, and customized experience. Specifically, we may use information collected about you via the Application to:

- To create and maintain our Service
- To manage and personalize your profile inside the Application
- To notify you about changes to our Service
- To allow you to participate in any interactive features of our Service when you chose to do so
- To provide support for the Application
- To resolve disputes and troubleshoot problems
- To gather data for analysis or valuable information to improve our Service
- To monitor the usage of our Service and specific features
- To detect and address technical issues
- To request feedback and contact you about your use of the Application

## Transfer of Data

Information you provide while using the Service, including Personal Data, may be transferred to – and maintained on – computers and servers located outside of your state, province country or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction.

If you are located outside European Union and choose to provide information by using the Service, please note that we transfer the data, including Personal Data, to Belgium, EU, to process it there.

We will take all reasonably necessary steps to ensure your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

The data controller is Manchester Metropolitan University, and the data custodian is the PI. Only the Research Team will have access to your information during and after the research project. Data will be maintained using encrypted digital files within password-protected folders on the PI' University OneDrive. Access to anonymized data will be limited to the Research Team and to the University for auditing purposes. The Research Team will be responsible for data destruction, which will involve wiping the OneDrive folder, and removing data from Firebase Realtime Database (with the support of the University IT department). In the case of a data breach, the University Data Protection Officer will be alerted within 72 hours of the incident occurring and the incident will be handled according to the University policy.

## Data Storage

The anonymized data will be stored in the PI's University OneDrive until project completion and will then be transferred to the PI's supervisor, Daniela Di Basilio, who will store them on her University OneDrive for up to 7 years according to the University data Storage policy for University staff members. The personal data collected (participants' email addresses) will be safely disposed of at the end of the project (March 2022).

### ***Additional Information:***

The University is registered with the Information Commissioner's Office (ICO) and manages personal data in accordance with the General Data Protection Regulation (GDPR) and the University's Data Protection Policy.

As a public authority acting in the public interest, the University relies upon the 'public task' lawful basis. When special category data (such as personal data) are collected, the University relies upon the research and archiving purposes in the public interest lawful basis.

The participants' rights to access, change or move your information will be limited, as we (the researchers) need to manage your information in specific ways for the research to be reliable and accurate.

## DISCLOSURE OF YOUR INFORMATION

We may share information we have collected about you in certain situations. Your information may be disclosed as follows:

### **By Law or to Protect Rights**

If we believe the release of information about you is necessary to respond to legal process, to investigate or remedy potential violations of our policies, or to protect the rights, property, and safety of others, we may share your information as permitted or required by any applicable law, rule, or regulation. This includes exchanging information with other entities for fraud protection and credit risk reduction.

### **Analytics**

We may use third-party Service Providers to monitor and analyze the use of our Service [Firebase], [Google Analytics].

### **Firebase**

Firebase is an analytics and cloud storage service provided by Google Inc. Google Firebase acts as a “data processor” for the purpose of GDPR, whereas the research study PI acts as the “data custodian”. At the end of the study, all data will be transferred to the PI’s supervisor. Therefore, we are responsible for the participants’ rights in relation to personal data. All records will be accessible only to the researchers who are a part of the Research Team and will be made accessible to the Manchester Metropolitan University for auditing purposes. All information provided will be treated in accordance with GDPR and UK Data Protection Act (2018). According to the criterion of data minimization, the Application will only collect data that is required to accomplish the relevant tasks of the project.

### **Online Postings**

When you submit exercise information, contributions or other content to the Application, your entries may be viewed only by us, the research team, and may be used for further analysis and research purposes.

## **THIRD-PARTY WEBSITES**

The Application may contain links to third-party websites and applications of interest, including advertisements and external services, that are not affiliated with us. Once you have used these links to leave the Application, any information you provide to these third parties is not covered by this Privacy Policy, and we cannot guarantee the safety and privacy of your information. Before visiting and providing any information to any third-party websites, you should inform yourself of the privacy policies and practices (if any) of the third party responsible for that website, and should take those steps necessary to, in your discretion, protect the privacy of your information. We are not responsible for the content or privacy and security practices and policies of any third parties, including other sites, services or applications that may be linked to or from the Application.

## **SECURITY OF YOUR INFORMATION**

We use administrative, technical, and physical security measures to help protect your personal information. While we have taken reasonable steps to secure the personal information you provide to us, please be aware that despite our efforts, no security measures are perfect or impenetrable, and no method of data transmission can be guaranteed against any interception or other type of misuse. Any information disclosed online is vulnerable to interception and misuse by unauthorized parties. Therefore, we cannot guarantee complete security if you provide personal information.

## **POLICY FOR CHILDREN**

We do not knowingly solicit information from or market to children under the age of 13. If you become aware of any data, we have collected from children under age 13, please contact us using the contact information provided below.

## **CONTACT US**

If you have questions or comments about this Privacy Policy, please contact us at:

Emma Elizabeth Craft, the Principal Investigator (PI)  
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Manchester, UK

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