

## Smile – A Dental Health Application From UCL Eastman Dental Institute

### Our commitment to the General Data Protection Regulation

#### Introduction

The General Data Protection Regulation (GDPR), a European privacy law, came into effect on 25 May 2018. This new law replaced a prior European Union privacy directive originally adopted in 1995.

UCL Eastman has welcomed and embraced the GDPR in its attempt to strengthen, harmonise, and modernise EU data protection and enhance your rights and freedoms as an individual. We are fully committed to abiding by the GDPR's regulations regarding the acquisition, use, storage, retention and deletion of your personal details.

In order to use your data for the purposes described below, we need your specific and verifiable consent, given freely and actively<sup>1</sup>.

#### What data do we have?

The Smile Mobile Application from UCL Eastman only\* collects personal data when people register for the usage of the app.

When you subscribe, you are asked to give us the following information:

- Your email address
- Your first name
- Your surname

The application is designed in a way to provide you with all the functionalities, whilst using a minimum input of data from your side. The only mandatory pieces of data – which we require as a minimum – are your first and last name, as well as your email address. No other data is collected about you by the application.

\*Please note that UCL and UCL Dental Eastman Institute may also have additional information on past and current students and staff which is being kept for legal reasons. This is kept and administrated separately and is not accessible by members of the Communication Team. For more information on what details we may hold about you in this context please contact [gdpr@ucl.ac.uk](mailto:gdpr@ucl.ac.uk).

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<sup>1</sup> In other words, we need to tell you exactly what we want your data for, we need to be able to prove you gave us your consent, we need you to give this consent of your own free will and we need you to give it actively – for example, by actively filling in a form or taking an action.

## Why we have your data and what we use it for

We collect the information above in order to provide you a dental health app secured with a login. The above named collected data points are only collected for authorization purposes and are not used in any other way. Moreover, any functionality of the Smile Application is not collecting any personal data about the user.

## Where we keep your data and how we keep it safe

Your data for the Smile Mobile Application is only stored in one place:

- They are kept in a cloud database hosted by Microsoft Azure. These copies are only accessible to those who have a Smile Administrator Account or the log-in details for the Microsoft Azure Database. The log-in details for the direct access of the database are kept on an encrypted device of the data controller. Once a Smile Administrator leaves, the respective account is deleted, and all access credentials are invalidated.

Microsoft is based in the US, however, your data is not being transferred out of the EU. Smile subscribed to Microsoft Azure Servers, located in the UK. Consequently, Microsoft has to uphold the same level of security standards as required by UK law and abide to UK data and consumer protection regulations. For further information, please see Microsoft Azure's [Privacy Policy](#).

The data, which you provide is only updated, in case you submit any changes of your information using the Smile Mobile Application. Individuals who delete their Smile account or request to be removed, are removed immediately.

We will never keep your data in other locations or send it via email. We will never give your data to a third party (apart from the cloud database host Microsoft Azure) including other divisions or central administrators at UCL – unless compelled to do so by a legal body.

## Your rights

The GDPR outlines your enhanced rights including:

- Your right to be forgotten: You may request that an organisation delete all data it holds on you without undue delay.
- Your right to object: You may prohibit certain data uses.
- Your right to rectification: You may request that incomplete data be completed or that incorrect data be corrected.
- Your right of access: You have the right to know what data about you is being processed and how.
- Your right of portability: You may request that personal data held by one organisation be transported to another

## What should you do if you want to invoke your rights?

You may request to access, correct, amend or delete information we hold about you (described above) at any time. Please, get in contact with Smile's data controller, by sending an email to [sfaamsa@ucl.ac.uk](mailto:sfaamsa@ucl.ac.uk) with your concern.