Travelrecce General Data Protection Regulation Documentation.

Created by Squared Software LTD on the 24th of August 2021.

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**Definitions.**

The following GDPR statement regards the use of the Travelrecce service. From herein, the Travelrecce service may be referred to as ‘the service’ ‘our service’ or ‘service’. ‘Us’, ‘Our’, or ‘We’ will refer to Squared Software LTD and its people. Travelrecce is owned and operated by Squared Software LTD. Travelrecce may be stylised as ‘travelrecce’, the same word in lower-case lettering. ‘Content’ is any data uploaded to the travelrecce service. To ‘Post’ or ‘Share’ means to upload content to our webservers to be displayed to any user within the Travelrecce service. ‘Within’ (the service) means an active user; ‘Outside’ (the service) means an entity (person, group, organisation, etc.) who is either not a registered user of the Travelrecce service or is able to view data from or in-connection with the travelrecce service (such as a screenshot, printed copy of posted content).

**Travelrecce General Data Protection Regulation Statement.**

The person at Squared Software LTD responsible for data protection is Jake Bailey. You can contact Jake Bailey at [jake@squaredsoftware.co.uk](mailto:jake@squaredsoftware.co.uk).

Our lawful basis to process personal data is ‘Consent’. Consent is granted where the user agrees to Terms of Use and GDPR statement.

**What Personal Information do we hold about our users?**

We hold the user’s:

* Service username
* Service biography
* Date of Birth
* Email address
* Password

The user’s service username and service biography may not always be personal information, but there is no limit to the user placing personal information in these fields.

**How did we get this data?**

We requested it from each user via the travelrecce application. This request was only valid after the user had agreed to our Terms of Use and this GDPR statement.

**Why do we hold this data?**

We hold the service username to attach any content posted by the user to their username. This means that other users of the service may find content by a known username. We hold the service biography to be displayed on the user’s service profile. We hold the Date of Birth to ensure that the user is over the age of 16, as required by our Terms of Service. We hold the user’s Email address for contacting the user, and for user sign in authentication. We hold the user’s password for user sign in authentication.

**How long do we keep user information?**

We hold all the above information from the date of user enrolment until 30 days after the user has requested to delete their account. For instance, if a user requests to delete their account after 60 days from when they signed up, we will keep their information for a total of 90 days.

**Do we share this information?**

No. If this changes, we will notify the user before doing so. We will not share a user’s information if they do not consent to it. We do not share any of the personal information above with third parties outside of the United Kingdom such as Advertisers but do share data with our users outside of the UK.

**Do we share any information?**

Yes. The advertisements found within the application are derived from the device’s unique IDFA. This IDFA is unique to each device, apart from in some circumstances in which it is null. The device’s IDFA is shared with the third-party company ‘Google’ to facilitate our reliance on these adverts. The IDFA cannot be set or updated from within the service.

**Is this information ‘special category data’, or sensitive data such as medical information.**

No. If this changes, we will request the user to hold any of their applicable data before doing so.

**Do we only collect personal information that we need to work with and use?**

Yes. We require the user’s Email address for correspondence and to authenticate themselves (including sign up and sign in) with our service. We require the user’s Date of Birth to ensure that they are old enough to use our service as stated in our Terms of Use. We also make sure that users also know the difference between information that is optional and required, as optional information is marked as ‘optional’ wherever it may be submitted.

**Do we keep personal information secure?**

Yes. User passwords on our webservers are encrypted, meaning that not our webserver provider, or us, can ever view a user password. Our webservers are only accessible by those with appropriate clearing within our organisation, and our webserver provider (Google) where necessary.

**Do our users know that we have their personal data, and understand how we use it?**

Yes. Users know that we hold their data, and how we use it, because they are required to read, acknowledge, and agree to this GDPR statement and Terms of Use before signing up. We also provide descriptions of data use on request.

**How can anyone (including a user) file a complaint to the Information Commissioner’s Officer?**

Anyone can call the ICO to complain about our information rights practices on the following helpline: 0303 123 1113. More information can be found at: <https://ico.org.uk/make-a-complaint/> . When contacting the ICO, you will want to reference us as the ‘Travelrecce social media service’ by ‘Squared Software LTD’. As stated above, the person responsible for data protection is ‘Jake Bailey’.

**How can a user request access to, a correction or deletion of, their data?**

A user can request access to all the information we have about them via the ‘Request Information’ page in the travelrecce mobile application for iOS. This data will then be delivered in a CSV file to their registered Email address within 10 days from the request being sent. The file will be sent from the sender ‘data@squaredsoftware.co.uk’. If the data has not reached the user within 7 days, they are asked to contact us at ‘support@squaredsoftware.co.uk’. The user can request to delete all their data at once from the ‘delete my account’ page in the travelrecce mobile application for iOS. All information can be corrected at any time from within the application.

We only allow users to request access to, a correction or deletion, of their data via the travelrecce mobile application for iOS so that we can ensure the person requesting this information is who they say they are. We can be sure of this because the user must first complete authentication by signing into the service, which is only available on the mobile application for iOS.

**Do we make automated decisions or do profiling based on the data we hold?**

We do not do profiling based on the data we hold about any user. The only automated decisions we perform are automated deletions within the 30-day period after a user has requested to delete their account.

**Do we refresh or destroy a user’s personal data after specified periods of time?**

We ask our users on an annual basis (1st December every year) if their email addresses are still accurate, if they are not, we request that they update their email address. We allow the user to refresh their own email address at any time they wish.

If a user has deleted their

**Do we have a way for people to exercise their rights regarding the personal data we hold about them?**

**The right to be informed**

Yes. We make the information we hold about our users available from within the travelrecce service, and how we use it.

**The right of access**

Yes. We allow users to request a copy of their personal information from the ‘Request Information’ page within the travelrecce mobile application for iOS.

**The right to rectification**

Yes. Inaccurate usernames, email addresses, and date of births, can be rectified from within the travelrecce mobile application for iOS at any time during the life span of the account, not including the 30-day deletion period for their account.

**The right to erasure**

Yes. As we only require the most basic information from our users, this means that erasing any of this data will result in an ‘incomplete’ account. An incomplete account is one without all necessary data to be used as part of the travelrecce service. Because of this, users will have to close their accounts to fulfil their right to erasure.

**The right to restrict processing**

Yes. We

**Do our staff know our data protection responsibilities?**

Yes. All staff are trained on the ICO’s guidelines and have read this document.

**Do we know what to do if something goes wrong, including a personal data breach?**

Yes. If we experience a breach then, depending on the severity of the breach, we contact individuals (users) who may have had their rights and/or freedoms affected without undue delay. If a breach is likely to risk any rights and/or freedoms, we will notify the ICO as soon as possible.

**End of document.**