Travelrecce Privacy Policy.

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

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Squared Software LTD is A Private Limited Company registered in England and Wales No: 13254227.

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**Definitions.**

The following Privacy Policy 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 Privacy Policy.

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

We hold the user’s:

* Service username.
* Service biography.
* Favourite Places
* Email address.
* Password.
* Device Information:
  + - Identifier for Advertisers (IDFA) (only on Apple devices).
    - Global Positioning System (GPS) information.
    - Internet Protocol (IP) address.

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. These requests were only valid after the user had agreed to our Terms of Use and this Privacy Policy. Advertising consent can be gathered before

**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 user’s Favourite Places for core functionality, the user may wish to view other users’ trips, and these Favourite Places selection help to personalise the results. 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.

We hold the user’s IDFA to pass onto our advertising partners, such as Google. We hold the user’s IP address for service analytics. User IP addresses cannot be viewed by us, instead they are used to derive less precise information for our analytics, such as the number of users in each country.

We hold the user’s GPS information as the user requests it in app, such as when trying to find their current position on the map. User GPS data is not processed on our webservers, rather just on the user’s device.

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

We hold all the user’s personal 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. This also applies to the user’s IDFA and IP address.

We process the user’s GPS data for as long as it’s needed by the user. For instance, if a user visited the service at 10:00am on a Monday, opened a page containing a map at 10:01am the same day, then requested the app to track their location for use on the map at 10:02am and then closed the app at 10:05am, we would only keep this information for 3 minutes before it’s removed.

This GPS data only leaves the user’s device if the user decides to use their current location as the location of a ‘trip’ (‘trip’ as described in the travelrecce terms of service). In this case, the GPS data is removed as soon as the user deletes a trip, and not kept longer than 30 days after requesting to delete their account (if a user deletes an account associated with existing trips).

**Do we share this information?**

Yes. We share the user’s IDFA with our advertisers, and the user’s IP address with our analytics provider. However, this is the only data we share. No other information as described above is shared. 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.

**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 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.

We require the user’s IP address to improve the quality of the service, as we use this information in our analytic tools. For instance, these tools help us understand if certain geographical areas are impacted by issues relating to our webserver, which we can then resolve.

**Do we keep personal information secure?**

Yes. User passwords on our webservers are encrypted, meaning that neither our webserver provider, nor 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 the Terms of Use and this Privacy Policy 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.

A user can also request these rights verbally, under certain circumstances.

**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.

**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, biographies, email addresses, favourite places, 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 allow our users to update their consent regarding targeted advertising via the service. If a user denies this, they will not have their service advertisements tailored to their online usage. The user’s advertisement targeting profile is created by Google. Learn more at: <https://travelrecce.com/advertisements> .

**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.**