

Privacy Policy

WHO WE ARE

We are Iridis Digital Limited, a registered private limited company (registered number SC576668) with our registered office at Research and Innovation Services, University of Stirling, Stirling FK9 4LA (“we”, “us” or “our”).

SCOPE OF POLICY

This policy forms part of our Terms of Service available at [INSERT LINK]. Any defined terms shall bear the meaning given to them in the Terms of Services.

By using this website and our mobile application (the “Services”) you are consenting to the practices set out in this policy.

We are committed to protecting and respecting your privacy. This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. This policy will: a) inform you as to how we look after your personal data when you visit this website (regardless of where you visit it from); and b) tell you about your privacy rights and how the law protects you. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

OUR RESPONSIBILITY FOR DATA PROTECTION

For the purpose of the General Data Protection Regulation (EU 2016/679), as amended from time to time, we are the data controller.

We have appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, please contact the DPO using the details set out below.

CONTACT DETAILS

If you have any questions about this privacy policy or our privacy practices, please contact our Data Protection Officer via email at data.protection@stir.ac.uk

You have the right to lodge a complaint at any time with the Information Commissioners Office (ICO) (www.ico.org.uk), the UK supervisory authority for data protection issues, if you think that we have infringed your rights. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

OUR REASONS FOR PROCESSING PERSONAL INFORMATION

We process personal information about you where this is necessary for our legitimate interests, for example:

- ensuring our Services (including your account), are properly maintained and operated;
- ensuring our Services content is presented to you in an effective manner, and personalising your user experience;

- providing you with information or services that you request;
- understanding app usage to help us improve our website and business, and improving search results; and
- to allow us to consider your comments, queries and suggestions and respond, if necessary.

We may also process your personal information where we require to do so to comply with law (e.g. to comply with a Court order or any other legal obligation).

Generally, we do not rely on consent as a legal basis for processing your personal data. Although we will obtain your consent before sending third party direct marketing communications to you. Please be aware that you have the right to withdraw consent to electronic marketing communications at any time by contacting us.

INFORMATION WE COLLECT FROM YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We will collect and process the following data about you:

- **Information you give us (Submitted information):**
 - Information you provide when you register with our Services: This is information you give us about you by registering to use the Services and filling in forms on the Services, or by corresponding with us (for example, by e-mail). It includes information you provide when you register to use our Services, download the mobile application, or report a problem with our Services. If you contact us, we will keep a record of that correspondence. This information may include your name, address, e-mail address and phone number, the Device's phone number, age, username, password, financial and credit card information and other registration information.
 - Information you choose to share: We may also receive information when you upload content to any of the Services (such as photographs, measurements of your living space, and communications in the "Question and Answer" section). When uploading any information or content about other people, you must first obtain the necessary permissions from that person before you upload.
- **Information we collect about you and your device.** Each time you use any of our Services we will automatically collect some or all of the following information:
 - Details of your visits to our website/ use of our mobile applications: This information includes traffic data, location data, web logs, and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access, and what resources you use on our website when you visit.
 - Information about your computer or device: This includes the type of device you use, a unique device identifier (for example, your device's IMEI number, the MAC address of the device's wireless network interface, or the mobile phone number used by the device), mobile network information, your mobile operating system, the type of mobile browser you use, time zone setting, IP address, browser type and operating system.

- Information provided through cookies: Our Services use cookies to distinguish you from other registered users and to provide you with a good user experience as you move through our Website. For detailed information on the cookies we use see below.
- Information stored on your device: This includes contact information, login information, photos, videos or other digital content. (Content Information);
- Location information: We also use GPS technology to determine your current location. Some of our location-enabled services require your personal data for the feature to work. If you wish to use the particular feature, you will be asked to consent to your data being used for this purpose. You can withdraw your consent at any time.

We do not collect: a) any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data); or b) any information about criminal convictions and offences.

COOKIES

We use cookies to distinguish you from other users of the Services. A cookie file (a small file of letters and numbers that we store on your computer or other access device) will be placed on your computer or other access device each time you visit our website. This helps us to provide you with a good experience when you use our Services and also allows us to improve the Services.

We may use:

- a. Temporary 'session' cookies to help you navigate through the Services and to enhance your user experience. These cookies are temporary and disappear when you close your browser.
- b. Permanent 'persistent' cookies (where we provide you with a log-in facility) to help us recognise you as a unique visitor when you log in to our Services, and to personalise your account. If you choose the 'Remember me' option, we use a persistent cookie to save you having to remember your log-in details. You can turn off this option by logging out and unticking the 'stay signed in' box. We use persistent cookies to track where our Services visitors came from, what search engine they used, what link they clicked on, and their location when they accessed our Services; and
- c. Google Analytics cookies to identify unique visitors, define user sessions, and track traffic sources and navigation. Information collected in this way does not personally identify you. You can find out more about these cookies here <https://developers.google.com/analytics/resources/concepts/gaConceptsCookies>.

You may delete cookies. However, if you delete them, you may lose any information that enables you to access the Services more quickly. You can also choose to enable or disable cookies in your web browser.

By default, your browser will accept cookies. However this can be altered. For further details please consult the help menu in your browser. Disabling cookies may prevent you from using the full range of Services

DISCLOSURE OF YOUR INFORMATION

Our standard practice will be to: a) anonymise the personal data received from you; and b) to amalgamate this data with other users' data to create new data sets where no one individual is identifiable (the "Data Sets"). The Data Sets may be disclosed to third parties, but this will not identify you or any other person and will not include any personal information.

We may disclose your personal information to third parties only in exceptional circumstances, being:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If we or substantially all of our assets are acquired by a third party, in which case personal data held by us will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request.
- In order to protect the rights, property or safety of our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

You should be assured that your personal data shall not be disclosed or shared with any third party unless one of the circumstances outlined above presents itself. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

WHERE WE STORE YOUR PERSONAL DATA

All information you provide to us is stored on secure servers based in the United Kingdom and is not transferred outside the European Economic Area.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted through our Services; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

PASSWORDS

Where you have been provided with (or where you have chosen) a password which allows you to access certain parts of the Services, you are responsible for keeping the password safe and confidential. You must not share your password with anyone.

HOW LONG WE HOLD YOUR PERSONAL DATA

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for (including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements). We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances, you can ask us to delete your data: see your rights section below for further information.

In some circumstances, we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

WITHDRAWING CONSENT

Where we rely on your consent to process your personal data, you have the right to withdraw your consent at any time. If you wish to exercise this right please contact us. However, if you do this, please note that it will not affect the lawfulness of processing based on consent before your withdrawal.

YOUR RIGHTS

You have the following rights as noted below, which can be exercised at no cost to you (unless your request is clearly unfounded or excessive). To exercise these rights please contact us..

- Request Access: you have the right to ask for a copy of the information held by us in our records (a subject access request).
- Restriction: you have the right to ask us to restrict our processing of your personal data.
- Objection: you can object to our processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your information for direct marketing purposes.
- Correction: if you become aware of any incorrect information held by us about you, you have the right to request that this is rectified.
- Erasure: you also have the right to request that information is erased if it is no longer required, you are exercising your right to object to processing or you are withdrawing consent for it to be processed.
- Portability: in certain circumstances you have the right to ask us to provide you with your personal data in a structured, commonly used and machine-readable format to allow you (or us on your behalf) to transmit this information to another party. More information can be found at <https://ico.org.uk> (link is external).

LINKING

Our Services may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates (including, but not limited to, websites on which the Services are advertised). If you follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services, such as contact and location data. Please check these policies before you submit any personal data to these websites or use these services.

ACCESS TO INFORMATION

We aim to keep your personal data up to date and welcome any updates to your details or corrections to any inaccuracies you choose to provide. Please help us keep our records updated by informing us of any changes to your email address and other contact details.

You have a right to request copies of the data held about you, and if information held by us is incorrect, you have the right to ask for this to be corrected. To request a copy of the data held about you or to update information, please contact us.

CHANGES TO PRIVACY POLICY

Any changes we may make to our privacy policy in the future will be posted on this page, and the latest version of the policy will be the one displayed on our website at any given time. It is your responsibility to check the policy displayed on our website and mobile applications each time you use our Services.