



# Vidatec

Technology for life

## Engage 4

## Privacy Policy

## PRIVACY POLICY

This notice (together with our Acceptable Use Policy (see [ww.engage4.com](http://ww.engage4.com)) and any applicable end user licence agreement or terms of use of the App Store (if applicable) (together our "Terms of Use") applies to your use of:

- the ENGAGE4 mobile application software (available on the App Store), once you have downloaded or streamed a copy of the App onto your mobile telephone or other handheld device ("Device"); and
- the ENGAGE4 desktop application software, accessible through our website at <https://app.engage4.com/auth> (our "Site");

(together referred to as the "App").

The access to, and provision of content and related services through, the App is referred to in this notice as the "Services". The App has been developed by Vidatec Ltd (registered in Scotland, No. SC394416) having its registered office at Unit 1&2, Scion House, Stirling University Innovation Park, Stirling, Scotland, FK9 4NF ("Vidatec", "we" or "us").

This notice sets out the basis upon which any personal data we collect from you, or that you provide to us, will be processed by us. 'Processing' for the purposes of this notice covers a broad range of activities, including using, transferring, storing and even deleting data.

The Services are made available to you pursuant to (and subject to the terms of) an agreement entered into between Vidatec and its client ("Client") who has purchased licences from Vidatec, enabling you to access and use the App. With regard to your data, Vidatec is acting as data processor on behalf of (and upon the instructions of) the Client, who shall be the data controller for the purposes of the relevant data protection legislation.

Please read the following terms carefully to understand our practices regarding your personal data and how we will treat it.

## USE OF THE APP

By registering with, or using, the Services, or supplying data or information through the App, you acknowledge that you are aware of the collection, use and transfer of data under the terms of this privacy notice (and the Terms of Use).

The App may contain links to other sites owned and operated by certain third parties. Such third party sites may also gather information about you in accordance with their own privacy policies. For privacy information relating to such sites, please consult their privacy policies as appropriate. Please be cautious when clicking on external web links, which is done at users' own risk. Vidatec do not guarantee or verify the contents of any externally linked website and cannot be held liable for any damages, losses or other implications (direct or indirect) caused by visiting any such external links.

Vidatec takes the security of its clients' and users' personal information seriously and our policies and operations comply with relevant privacy and data protection laws. Any queries should be sent to [hello@engage4.com](mailto:hello@engage4.com)

## PERSONAL DATA WE MAY COLLECT IN RELATION TO YOU

We may collect, and process, the following types of personal data about you:

- You may give us information about yourself (“Submitted Information”) by a number of different routes, including:
  - information you provide when you download or register with the App and/or when you report a problem with an App, or the Services. This information may include your name, e-mail address, phone number, job title, department, username, password and other registration information;
  - information you provide in the course of using the Services (including uploading information or content, expressing preferences or likes, or voluntarily participating in any online forum);
  - your browsing behaviour, when using the Services;
  - if you contact us, we may keep a record of that correspondence;
  - details of any preferences which you express (in relation to the subject matter or type of information that you choose to receive from us or that you may have an interest in) in the course of using the Services; and/or
  - information collected as a result of any monitoring which may take place. We may monitor certain interactions between us in order to comply with any legal obligations, to detect fraud or criminal activity and/or for training purposes.
- Information we collect about you and your Device. Each time you use the Services, we may automatically collect the following information:
  - technical information, including the type of mobile device you use, a unique device identifier, mobile network information, your mobile operating system, and time zone setting (“Device Information”); and/or
  - details of your use of the Services and the resources or content that you access (“Log Information”).

#### USES MADE OF THE INFORMATION

We may use personal data we collect about you in the following ways:

- Submitted Information: We will use information which you submit as part of registering to use the App or the Services in order to manage your account and to fulfil our agreement with the Client, to provide technical support, to notify you regarding any important updates relating to the App or the Services, to answer queries you might raise regarding the App or the Services and for our own internal administrative purposes.
- To enhance your use of the App: We strive to provide you with choices regarding the information or content which is most relevant to you. We may use your preferences, user behaviour and Device Information to form a view (or to assist the Client in forming a view) on what information and content may be of interest to you. We may also ask you to identify areas of particular interest and if you choose to provide those details or express any preferences then we may send you information which we feel may be relevant to those areas of interest or which might otherwise be of interest to you based on the preferences identified. This may include information on health and wellbeing.
- Device Information: We will use this information to help ensure that Engage4 presents the correct version and data for your Device.

- Log Information: this is stored for security and audit purposes and to ensure that we are able to support your use of Engage4.
- For security and safety purposes: We will monitor activity in order to help protect our users from security threats and to detect if users are trying to misuse any element of the App or the Services.
- To statistically analyse user behaviour and activity: We will monitor user interest and behaviour to help us to understand general usage of the Services, and to help us improve the services we provide. We may conduct statistical analysis in respect of the Services, either on our own behalf or on behalf of the Client.

#### BASIS ON WHICH WE PROCESS YOUR PERSONAL DATA

We may rely on a range of legal grounds (in accordance with applicable privacy laws) in order to ensure that our processing of your personal data is lawful, including:

- Where it is needed to enable you to have access to the Services, such as:
  - updating your records;
  - activities relevant to managing the App, including ensuring that the content provided is relevant to you;
- Where it is in our legitimate interests to do so (provided this is not overridden by considerations regarding your rights and interests), such as:
  - managing the App, and maintaining and updating our records;
  - performing, and/or testing the performance of, the App, and our internal processes;
  - managing and auditing our business operations;
  - undertaking analysis and developing statistics; and/or
  - to help us to provide you with relevant information and content;
- To comply with our legal obligations, including our obligations in terms of the agreement between us and the Client;
- Where you have expressly consented to the processing. In particular, by choosing to provide us with any health or wellbeing preferences, then to the extent that such data amounts to 'special category data' (as defined in the relevant legislation, being data concerning your health) then you are expressly consenting to our processing that data for the purposes outlined in this privacy notice.

#### DISCLOSURE OF YOUR INFORMATION

We may disclose your personal data to third parties:

- 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.
- To a contractor appointed by us to deliver elements of the Services on our behalf (and under our control). Any access granted will be limited to such information as is required for them to deliver the relevant service (and will be subject to appropriate obligations of confidence and compliance with applicable law).
- In order to:
  - enforce or apply the Terms of Use and other agreements or to investigate potential breaches of the same; and/or

- protect the rights, property or safety of Vidatec, our clients, or others (acting at all times in accordance with our obligations under the relevant data protection legislation).

We may also share data with the Client where it has been anonymised (meaning you are no longer able to be identified from the information).

We will not share your personal data with any third party for their marketing purposes.

## HOW AND WHERE WE STORE YOUR PERSONAL DATA

We use strict procedures and security features designed to prevent any unauthorised or unlawful access to the personal data processed by us.

Personal data which we hold in relation to you will be stored securely on our servers. We may also use service providers to help us run the Site, or the App (such as third party host services) some of whom may be based outside the EEA.

We will retain a record of your personal data in accordance with relevant law and the following criteria:

- where we have a reasonable business need to do so, for example, to the extent that you continue to be a user of the App; and/or
- in line with any legal and regulatory requirements or guidance in respect of retention periods.

## YOUR RIGHTS

Data protection legislation gives you the right to access the information which we hold about you. You are also entitled to have personal data we hold about you changed if it is inaccurate or incomplete, and erased where it is no longer necessary for us to hold it for the purposes it was originally collected. You have a right to restrict processing of data we hold about you in certain circumstances and the right to data portability to allow you to obtain and reuse information we hold about you for your own purposes.

If you would like to exercise any of those rights, please send a written request to [hello@engage4.com](mailto:hello@engage4.com).

Although there is no specific method you should use to exercise these rights, we will need sufficient information to identify you and we might request further information to verify your identity.

You are entitled to complain about any breach of your statutory rights to a supervisory authority such as the Information Commissioner's Office. You can find more information about your rights on the Information Commissioner's Office website – please see <https://ico.org.uk/for-the-public/>.

## CHANGES TO OUR PRIVACY NOTICE

We may update this privacy notice from time to time (for example, to reflect changes we might make to our services or to reflect changes in the law or best practice). We encourage you to visit this page periodically so that you are aware of any changes which have been made. In addition, changes may be notified to you when you next start or log in to the App. The new terms may be displayed on-screen and you may be required to read and accept them to continue your use of the Services.

## USE OF COOKIES

Our Site uses cookies to better the user's experience while visiting the site. In accordance with relevant legislation, our Site uses a cookie control system allowing the user on their first visit to the website to explicitly allow or disallow the use of cookies on their computer / device. Cookies are small files saved to the user's computer hard drive that track, save and store information about the user's interactions and usage of our Site. This allows our Site, through its server, to provide the user with a tailored experience within our Site. Users are advised that if they wish to deny the use and saving of cookies from our Site on to their computer's hard drive, they should take necessary steps within their web browser's security settings to block all cookies from our Site and its external serving vendors.

Our Site uses tracking software to monitor its visitors to better understand how visitors use our Site. This tracking software is provided by Google Analytics. The software will save a cookie to the user's computer hard drive in order to track and monitor the visitor's engagement and usage of our Site, but will not store, save or collect personal information. Google's privacy policy can be accessed at <http://www.google.com/privacy.html>. Other cookies may be stored to the user's computer hard drive by external vendors when our Site uses referral programs, sponsored links or adverts (more information provided below). Such cookies are used for conversion and referral tracking and typically expire after 30 days, though some may take longer. No personal information is stored, saved or collected. No information collected is shared by any third parties.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our Site.

## SOCIAL MEDIA PLATFORMS

The App may use social sharing buttons which help to share web content directly from web pages to the social media platform in question. Users make use of such social sharing buttons at their own discretion and at their own risk. Users should also note that the social media platforms may track user's requests and other activities with its own tracking software.

Any use which users of the App make of external social media platforms is undertaken subject to the terms and conditions of the relevant social media platform. Users are advised to use social media platforms wisely and to engage with them with due care and caution in regard to their own privacy and personal details. The App will not ask for personal or sensitive information through social media platforms.