

## TRINITY COLLEGE LONDON

### PRIVACY POLICY - EXAMINER TABLET AND APPS

#### PLEASE READ THESE TERMS AND CONDITIONS CAREFULLY BEFORE USING THE EXAMINER TABLET AND APPS

#### 1. INTRODUCTION

We provide you on a free loan basis with an android tablet computer ("**Examiner Tablet**") loaded with a software application (the "**Mobile App**") designed to be used in conjunction with a specific Trinity web-based application suite (the "**Web App**" including the Trinity websites relevant to that web-based application suite such as Trinity Online). The Mobile App and the Web App together are referred to as the "**Examiner Apps**" in this policy (the "**Privacy Policy**").

This Privacy Policy together with the terms of use and licence and any additional terms of use incorporated by reference into either of those documents (together the "**Terms of Use**") apply to your use of the Examiner Apps. The Terms of Use are to be found at ([www.trinitycollege.examiner.terms of use.co.uk](http://www.trinitycollege.examiner.terms of use.co.uk))

They also set out the basis upon which any personal data we collect from you, or that you provide to us as a result of your use of the Examiner Apps, will be processed by us. Please read this Privacy Policy very carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the Data Protection Act 1998 (the "**Act**"), the data controller is Trinity College London of the address given in clause 2.

#### 2. INFORMATION ABOUT US

The Examiner Apps are owned and operated by Trinity College London ("**Trinity**"/"**we**"/"**our**"/"**us**"), which is a private company limited by guarantee registered in England and Wales (registered number 02683033) whose registered office is at 4th Floor, 89 Albert Embankment, London SE1 7TP, United Kingdom. We are also a registered charity in England and Wales under no. 1014792. Our UK VAT registration number is 680767793.

#### 3. INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

3.1 **Information that you submit to us:** that is to say, information that you provide to us by filling in forms either in the Web App or synchronised to the Web App. This includes information provided at the time of registering to use the Examiner Apps, including your email address, your mother's maiden name and your personal access codes. We may also ask you for information when you report a problem with either of the Examiner Apps.

3.2 **Additional Information:** that is to say:

3.2.2 details of your GPS location and transactions that you carry out through the use of the Examiner Apps and the fulfilment of those transactions (e.g. hotel reservations);

- 3.2.3 for audit purposes, details of your visits to the Web App (sites) and the resources that you access;
  - 3.2.4 synched content, information, comments and/or marks you attribute to candidates taking our exams, including your candidate searches, for audit and compliance purposes;
  - 3.2.5 information about the Examiner Tablet you use for system administration purposes. This is statistical data about how you use your Examiner Tablet and does not identify you;
  - 3.2.6 that we may also ask you to complete surveys that we use for monitoring, training and research purposes, although some may not be compulsory;
- 3.3 **Examiner Tablet information:** that is to say, information about the Examiner Tablet and any other device or computer you may use in connection with the Examiner Apps including, where available, unique (device and computer) identifiers and details about the operating system, browser type and mobile network (if any) used. We may associate this "Examiner Tablet" information with the information you submit to us under clause 3.1 and will treat the combined information as personal data in accordance with this policy for as long as it is combined.
- 3.4 **Location information:** that is to say, information about your actual location when you use the Examiner Apps. Some functionality of the Examiner Apps requires your personal data for it to work. You can turn off this functionality at any time by turning off the location services settings for the Mobile App on the Examiner Tablet but be aware that the Mobile App will lose certain functionality (such as the correct time at the location) if you do. By using the Mobile App with the location service settings active, you consent to the transmission, collection, maintenance, processing and use of your location data by us in connection with your use of the Examiner Tablet and Examiner Apps.
- 3.5 **Log information:** that is to say, certain information in server logs that we automatically collect and store when you use the Examiner Apps, including but not limited to IP addresses, internet service provider, clickstream data, browser type and language, viewed and exit pages and date or time stamps.
- 3.6 **Unique application numbers:** that is to say, the unique numbers (if any) associated with our Examiner Apps sent to us when, for example, one of them searches for an automatic update to it.
- 4. WHERE WE STORE YOUR PERSONAL DATA**
- 4.1 The data that we collect from you may be transferred to and stored at a destination outside of the European Economic Area ("EEA"). It may also be processed by staff operating outside of the EEA who work for us or for one of our suppliers. By submitting your personal data, you consent to this transfer, storing or processing.
- 4.2 We endeavour to take all reasonable steps to protect your personal data. All the personal data you provide to us is stored securely on our servers and is encrypted using SSL technology.

- 4.3 Please ensure that you do not send electronic information to us otherwise than through the Examiner Apps and therefore over the secure SSL connection we provide. Once we have received your information, we will use strict procedures and security features in accordance with clause 4.2 above to try to prevent unauthorised access.
- 4.4 You are responsible for keeping your password and any other user identification confidential. Please do not share your password with anyone.
- 4.5 We may also collect and store personal data from and on your Examiner Tablet using application data caches and browser web storage (including HTML 5) and other technology.

## 5. USES MADE AND DISCLOSURE OF YOUR INFORMATION

- 5.1 We use information held about you in the following ways:
- (a) **Information that you submit to us:** for the purpose of managing your account on the Examiner Tablet;
  - (b) **Additional Information:** for the purposes set out under clause 3.2;
  - (c) **Examiner Tablet information:** for IT and security purposes;
  - (d) **Location information:** for financial and auditing purposes;
  - (e) **Log information:** for auditing purposes;
  - (f) **Unique application numbers:** for IT and content update purposes.
- 5.1.2 to ensure that content in the Examiner Apps is presented in the most effective manner for you;
- 5.1.3 to carry out our obligations arising from any contracts entered into between you and us;
- 5.1.4 to send you information about our activities and programmes by email. You may choose not to receive information about our activities and programmes when you first attempt to use the Mobile App or, if you opt-in to receiving marketing communications when we collect your personal information but subsequently change your mind, you can send us an email at [unsubscribe@trinitycollege.co.uk](mailto:unsubscribe@trinitycollege.co.uk) [please check this email address is correct] and we will unsubscribe you;
- 5.1.5 dealing with your enquiries and requests;
- 5.1.6 providing reservation or booking services in connection with your attendance at exams; and
- 5.1.7 to notify you about changes to the Examiner Apps, this Privacy Policy and the Terms and Conditions of Use, in accordance with our obligations to do so.
- 5.2 We will only disclose personal information we collect from you via the Examiner Apps:
- 5.2.1 to the schools, colleges, education centres, local authorities, community centres or any other entity that provides training courses to individuals taking a qualification awarded by us (each a **“Registered Exam Centre”**) to

the extent necessary for the Registered Examination Centre to be aware that you will be examining candidates for such exams;

- 5.2.2 to persons or bodies contracted by us to carry out the roles of examiner, marker, advisor, moderator, tutor, consultant, representative or other similar roles on our behalf in the context of our provision of qualifications where this is appropriate;
  - 5.2.3 to persons or bodies (such as airlines or hotels) that we contact to facilitate the performance of your duties as an examiner, as agreed with you;
  - 5.2.4 as required by law and/or to government bodies and law enforcement agencies;
  - 5.2.5 in order to enforce or apply the terms of this Privacy Policy or our Terms of Use or any other relevant terms or to investigate potential breaches of the same;
  - 5.2.6 to successors in title to our business; and
  - 5.2.7 to suppliers we engage to process data on our behalf.
- 5.3 You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes either on the Mobile App or when you access the Web App. You can also exercise the right at any time by contacting us at [insert the correct email address].

## **6. ACCESS TO INFORMATION**

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

## **7. COOKIES**

- 7.1 The Web App uses cookies to distinguish you from other users of it. This helps us to provide you with a good experience both when you use the Web App through the Mobile App (using the Examiner Tablet) and when you use it on its own through a personal computer. Further, it allows us to improve the Examiner Apps both individually and working one with the other. By agreeing to the terms of this Privacy Policy, you are agreeing to our use of cookies.
- 7.2 A cookie is a small file of letters and numbers that we store on the browser of your Examiner Tablet as well as on the browser of the personal computer you use to access the Web App. We also store this file on the hard drives of your Examiner Tablet and personal computer, if you agree. Cookies contain information that is transferred to the hard drive of your Examiner Tablet and/or personal computer, as the case may be.
- 7.3 We use the following cookies:

- 7.3.1 **Strictly necessary cookies.** These are cookies that are required for the operation of the Web App. They include, for example, cookies that enable you to log into secure areas of the Web App;
- 7.3.2 **Analytical/performance cookies.** These allow us to recognise and count the number of users of the Web App and to see how they move around the Web App when they are using it. This helps us to improve the way the Web App works, for example, by ensuring that users able to find what they are looking for easily;
- 7.3.3 **Functionality cookies.** These are used to recognise you when you use the Web App after the first time. This enables us (amongst other things) to personalise the content you require, to greet you by name and to remember your preferences;
- 7.3.4 **Targeting cookies.** These cookies record your visit to the Web App, the pages you have visited and the links (if any) you have followed. We will use this information to make the Web App more relevant to the information you usually require.

7.4 You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie	Name	Description
<b>Strictly necessary</b>		
BadBehaviour	bb2_screener_	Used to facilitate identifying misuse of web-based services e.g. spamming.
Contensis	ASP.NET_SessionId	Used to enable state for interactive services, such as forms, and to enable authorisation to access restricted areas of the Web App.
Trinity Central Authentication Service	JSESSIONID	Used to facility authorisation to access restricted areas of the Web App.
WordPress	PHPSESSID	Used to enable state for interactive services, such as forms, and to enable authorisation to access restricted areas of the Web App.
<b>Performance</b>		
Digital analytic	ns_cookiesets	Used to monitor usage of the Web App. This information allows us to assess how the Web App is used. Anonymous data about usage (e.g. number of users, number of times each page is visited) is collected and aggregated to produce usage reports.
	ns_sessio	
Google Analytics	__utma	Used to monitor usage of the Web App. This information allows us to assess how the Web App is used. Anonymous data about usage (e.g. number of users, number of times each page is visited) is collected and aggregated to produce usage reports.
	__utmb	
	__utmc	
	__utmv	
	__utmz	
QuantCas	__qc	Used to monitor usage of the Web App. This information allows us to assess how the Web App is used. Anonymous data about usage (e.g. number of users, number of times each page is visited) is collected and aggregated to produce usage reports.
WassUp	wassup	Used to monitor usage of the Web App. This information

	wassup_screen_res	allows us to assess how the Web App is used. Anonymous data about usage (e.g. number of users, number of times each page is visited) is collected and aggregated to produce usage reports.
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7.5 You can block cookies by activating the setting on the browser on your Examiner Tablet or personal computer (as the case may be) that allows you to refuse some or all 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 the Web App and the Mobile App will not work as intended.

7.6 Except for essential cookies, all cookies will expire after **[insert expiry period]**.

**8. OTHER WEBSITES**

The Web App may contain links to other websites which are outside our control and are not covered by this Privacy Policy. If you access other websites using the links provided, the operators of these websites may collect personal information from you which will be used by them in accordance with their privacy policy, which may differ from ours. Please check these policies before you submit any personal data (such as contact and location data) to these websites.

**9. CHANGES TO OUR PRIVACY POLICY**

Any changes we may make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by SMS or email or when you next start the Mobile App or log on to the Web 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 Examiner Apps.

**10. CONTACT**

Questions, comments and requests regarding this Privacy Policy (including in relation to cookies) are welcomed and should be addressed to [insert relevant email address].

Posted: **[INSERT DATE]**