

# Privacy Notice for University of Bolton – Connect ([connect.bolton.ac.uk](http://connect.bolton.ac.uk))

## BACKGROUND:

We, the University of Bolton respect and value the privacy of everyone who visits Our Service and will only collect and use information in a manner consistent with your rights and our obligations under applicable law. We understand that your privacy is important to you and that you care about how your information is used and shared online.

Our Service is a communications channel between the User (a student interested in courses at the University of Bolton) and Programme Leaders, or Profile Owners (representatives of our Institution). We hold User, Programme Leader, Admin User and Profile Owner data for the express purpose of providing this communication channel.

This Privacy Policy applies to Our use of all data collected by Us in relation to your use of Our Service. Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is deemed to occur upon your first use of Our Service.

**If you do not accept and agree with this Privacy Policy then you must stop using Our Service immediately.**

## 1 Definitions and Interpretation

In this Privacy Policy the following terms shall have the following meanings:

“Account”	means an Account required for a User to ‘Post a Question’, ‘Direct Message’, ‘Book a Call’ or ‘Schedule a call’ through Our Service;
“Answers”	means the area and functionality of the site that acts like a knowledge base of previously answered questions. It is searchable and Users can submit new questions;
“Book a Call”	means booking a direct phone or video connection with a Profile Owner or Programme Leader.
“Call”	means a connection by telephone or video between a Profile Owner and a User facilitated by Our Service;
“Call Agenda”	means the topics the User would like to discuss during and phone connection;
“Call Recording”	means a recorded copy of the audio or video communication that takes place through Our Service;
“Content”	means any and all text, images, audio, scripts, code, software, databases and any other form of information capable of being stored on a computer that appears on, or forms part of, Our Service;
“Cookie”	means a small text file placed on your computer or device by Our Service when you visit certain parts of Our Service and/or when you use certain features of Our Service.
“Customer Institution”	means the University of Bolton made available through Our Service;
“Direct Message”	means sending a message directly to an individual Profile Owner;
“Feedback Survey”	means a form which is completed by participants after a call engagement facilitated through Our Services;
“Our Service”	means any and all content and functionality made available at <a href="http://connect.bolton.ac.uk">connect.bolton.ac.uk</a> and any and all related subdomains;
“Profile”	means a page of Our Service which contains information about a specific Profile Owner;
“Profile Owner”	means a representative of Our Institution available through a profile on Our Service;
“Post a Question”	means submitting a question to ‘Answers’ to be seen and answered by multiple Profile Owners;
“Primary Point of Contact”	means a representative of the Customer Institution who is a point of contact for Users when engaging with the Customer Institution through the service;
“Private Content”	means Content which is shared to specific recipients through Our Service but is not published to Our Service to be seen by multiple Users;
“Public Content”	means content which is published to Our Service and can be read by multiple Users;

<b>“Review”</b>	means feedback the Profile Owner submitted in the Profile Owner feedback survey after a Call;
<b>“Scheduling”</b>	means the process of scheduling a time for a call that the User initiates when they want to speak to a Profile Owner;
<b>“Schedule a call”</b>	means booking a direct phone or video connection with a Profile Owner or Programme Leader.
<b>“UK and EU Cookie Law”</b>	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended in 2004, 2011 and 2015;
<b>“User”</b>	means anyone who browses the content and/or uses the services made available at all subdomains of connect.bolton.ac.uk;
<b>“User Content”</b>	means any content submitted to Our Service by Users including, but not limited to, questions submitted to answer, written content in direct message, User reviews, call agendas;
<b>“User Review”</b>	means feedback the User submitted in the User feedback survey after a phone connection;
<b>“We/Us/Our”</b>	means University of Bolton

## 2 Information About Us

2.1 Our Service, [connect.bolton.ac.uk](https://connect.bolton.ac.uk), is owned and operated by the University of Bolton.

## 3 Scope – What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Service made available at connect.bolton.ac.uk. It does not extend to any websites that are linked to from Our Service (whether we provide those links or they are shared by other Users). We have no control over how your data is collected, stored or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

## 4 What Data Do We Collect?

4.1 Some data will be collected automatically by Our Service (for further details, please see Clause 12 on our use of Cookies), other data will only be collected if you voluntarily submit it (for example, when you create an Account). Depending on your use of Our Service, We may collect some or all of the following data from you:

### 4.2 Visitors

A Visitor is defined as anyone who browses Our Service without creating an Account. We use Google Analytics User ID tracking and have a contact form available so we can collect the following information from visitors to Our Service:

- IP address (automatically collected);
- Web browser type and version (automatically collected);
- Operating system (automatically collected); and
- A list of URLs starting with a referring site, your activity on Our Service, and the site you exit to (automatically collected).

### 4.3 Users

A User is defined as anyone who creates an Account to Post a Question, Direct Message, Schedule a call or Book a Call through Our Service. In addition to data collected from visitors, We collect the below information when you create an Account:

- Full Name;
- Email address;
- Phone number;
- Preference data such as subject, course and topics of interest;
- Call recording and Direct Messages;
- Personal biography (optional);
- Headline information (optional);
- Questions posted to answers functionality, call recording and direct message data; and
- Student ID

#### 4.4 **Profile Owner or Programme Leader**

A Profile Owner is defined as anyone who represents a customer institution or organisation by having a owning a profile on Our Service. In addition to data collected from visitors and users, we collect the below information when someone creates a profile:

- Institutional email address;
- Profile data including (but not limited to): profile picture, course subject and courses, university school or division, course dates, a personal message, and biography; and
- Answers that you submit through Our Service's Answer functionality;

#### 5 **How Do We Use Your Data?**

All personal data is stored securely in accordance with the principles of the General Data Protection Regulation and Data Protection Act 2018 and any applicable successor legislation. For more details on security see Clause 6, below.

5.1 We use your data to provide the best possible service to you. This includes:

- providing and managing your Account;
- providing and managing your access to Our Service;
- supplying Our Services to you;
- personalising and tailoring Our Services for you;
- responding to communications from you;
- asking for feedback from you to improve Our Service;
- analysing your activity on Our Service to make improvements;
- scheduling communications for call bookings; and
- notifications of Direct Messages and new questions in the Answers functionality.

5.2 We will not directly send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the Data Protection Act 2018 and the Privacy and Electronic Communications (EC Directive) Regulations 2003, as amended in 2004, 2011 and 2015, and as may be updated or replaced from time to time.

5.3 User Account holders may receive marketing communications from Us. This is explicitly agreed to (as an Opt-In) when creating a User Account.

5.4 We commit to full compliance of the General Data Protection Regulation (GDPR).

#### 6 **How and Where Do We Store Your Data?**

6.1 We only keep your data for as long as We need to. We reserve the right to delete User Accounts that have been inactive for at least 36 months.

6.2 We store Call Recording and Direct Messaging data in an identifiable format for a period of one (1) year, after which time it will be anonymised.

6.3 If a potential safeguarding risk is identified by a Customer Institution or organisation in a Direct Message or recorded Call, We will store that information in an identifiable format for a minimum of three (3) years, after which time it will be anonymised.

6.4 We will store your other data related to your Account until your Account is deleted. All data collected when an Account is opened will be deleted from Our Service no later than three (3) business days after deleting your Account.

6.5 All questions or answers you have posted to the Answers functionality will be deleted no later than five (5) business days after deleting your Account.

6.6 Direct Messaging and Call Recording data will persist in an identifiable format for at least 1 year.

6.7 All data, excluding Call Recording data, will only be stored within the European Economic Area (the "EEA") (The EEA consists of all EU member states, plus Norway, Iceland and Liechtenstein).

- 6.8 Call Recording data will be stored by Twilio Inc, 375 Beale street, Suite 300, San Francisco, CA 94105, USA ("Twilio") in the Amazon Web Services North Virginia Region. We have a Data Protection Agreement Model Clauses with Twilio to govern this data transfer and storage to protect the rights and of EU citizens using Our Service.
- 6.9 Data security is of great importance to us. To protect your data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure data collected through Our Service.
- 6.10 Steps We take to secure and protect your data include:
- daily backups of your data;
  - SSH only access to our web server;
  - Full SSL (https) connection to the site;
  - Database is password protected and only accessible from a designated local IP Address; and
  - Passwords are encrypted to 256-bits, so are non-human readable.
- 6.11 Notwithstanding the security measures that We take, it is important to remember that the transmission of data via the internet may not be completely secure and that you are advised to take suitable precautions when transmitting data to us via the internet.

## **7 Do We Share Your Data?**

- 7.1 We will share your data with third party companies that support Our Service. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under the applicable law. We will ensure that data is processed and stored to the standards set out above, and:
- Inzite Ltd ("Inzite") will process and store your personal data for opening an Account, profile display, Direct Messaging, Answers, Call Booking and Call Scheduling. Inzite Ltd operate this service as a primary Data Processor and have full access to all Customer Data;
  - [Twilio Inc](#) will process your contact information and store Call Recordings to facilitate and monitor Calls (a sub-processor to Inzite Ltd);
  - [Amazon Web Services](#), a subsidiary of Amazon.com Inc, may be used to store call recording data, profile pictures and backup data files (a sub-processor to Inzite Ltd); and
  - [Digital Ocean](#), where customer data is stored and processed at an EU datacentre (a sub-processor to Inzite Ltd).
- 7.2 We may sometimes contract with other third parties to provide additional service to you. These may include payment processing, search engine facilities, advertising and marketing. In some cases, the third parties may require access to some or all of your data.
- 7.3 Profile Owners agree that We can share their Account information as well as Direct Message and Call Recording data for quality assurance and safeguarding purposes with the Customer Institution or organisation they represent.
- 7.4 We may compile statistics about the use of Our Service including data on traffic, usage patterns, user numbers, sales and other information. All such data will be anonymised and will not include any personally identifying information. We may from time to time share such data with third parties such as prospective investors, affiliates, partners and advertisers. Data will only be shared and used in accordance with applicable law.
- 7.5 In certain circumstances We may be legally required to share certain data held by Us, which may include your personal information, for example, where We are involved in legal proceedings such as a safeguarding incident, where We are complying with the requirements of legislation, a court order, or a governmental or regulatory authority. We do not require any further consent from you to share your data in such circumstances and will comply as required with any legally binding request that is made of Us.

## **8 What Happens If Our Business Changes Hands?**

8.1 We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Data provided by Users will, where it is relevant to any part of Our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use the data for the purposes for which it was originally collected by Us.

8.2 If any of your data is to be transferred in such a manner, you will be contacted in advance and informed of the changes. At that point, you will be able to delete your Profile to remove data if you no longer wish to be part of Our Service.

## **9 How Can You Control Your Data?**

9.1 When you submit information via Our Service as a User, you consent by default to receive marketing communications from the Customer Institutions and organisations with whom you engage. These Customer Institutions and organisations must have 'unsubscribe' links in those emails.

9.2 You have full control of which Profile Owners, and therefore Customer Institutions, you engage with through Our Service. As your Account data will only be shared with Customer Institutions who you engage by Booking a Call, Posting a Question or Direct Messaging, you are in full control of who has access to your data.

9.3 You may delete your Account at any time. This will remove your data from Our Services as described in Clause 6.

## **10 Your Right to Withhold Information**

10.1 You may access Our Service as a visitor and see the same useful Content on the site as Account holders.

10.2 You may choose to block Cookies which will limit the technical data We collect from visitors of Our Service.

10.3 To engage with Our Services by Posting a Question, Direct Messaging or Booking a Call, you must create an Account. All information We ask for when creating a user Account is mandatory.

10.4 As a Profile Owner, you must complete Account Information and additionally profile information. Account Information is mandatory. Profile Information has mandatory and optional parts. Telephone number, course category and personal message are mandatory. Profile picture, educational background, personal interests, course dates and languages data are optional and may be withheld.

## **11 How Can You Access Your Data?**

You have the legal right to ask for a copy of any of your personal data held by Us (where such data is held). Please contact us for more details at [connect@bolton.ac.uk](mailto:connect@bolton.ac.uk) or using the contact details below in Clause 13.

## **12 Cookies**

12.1 Our Service may place and access certain first party Cookies on your computer or device. We use Cookies to facilitate and improve your experience of Our Service and to provide and improve Our Service. We have carefully chosen these Cookies and have taken steps to ensure that your privacy is protected and respected at all times.

12.2 By using Our Service you may also receive certain third party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than Us. We use third party Cookies on Our Service for improving your experience on Our Service and for analytics purposes. These Cookies are integral to the functioning of Our Service where Accounts are required.

12.3 All Cookies used by and on Our Service are used in accordance with current UK and EU Cookie Law.

12.4 Before any Cookies are placed on your computer or device, you will be shown a banner stating "by using Our Service, you agree to our use of cookies" requesting your consent to those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible

experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Service may not function fully or as intended.

12.5 The following third party Cookies may be placed on your computer or device:

Name of Cookie	Provider	Purpose
connect.sid	Inzite Ltd	Session authentication of users.
inzite.redirectionUrl	Inzite Ltd	Used to redirect a user to saved URL after login.
inzite.expertApplicationEmailVerify	Inzite Ltd	Conditional flag cookie to display appropriate message during Profile creation.

12.6 We use Google Analytics to help analyse how users use the Site. Google Analytics uses cookies to collect and store information such as how often Users visit the Site, what pages they visit, and what other sites they used prior to coming to the Site. We use the information we get from Google Analytics only to improve Our Services. Please see the following links for more information about Google Analytics: [http://www.google.com/privacy\\_ads.html](http://www.google.com/privacy_ads.html), <http://www.google.com/privacy.html>, and <http://www.google.com/analytics/tos.html>.

12.7 You can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

12.8 You can choose to delete Cookies at any time, however you may lose any information that enables you to access Our Service more quickly and efficiently including, but not limited to, login and personalisation settings.

12.9 It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

### 13 **Contacting Us**

If you have any questions about Our Service or this Privacy Policy, please contact Us by email at [connect@bolton.ac.uk](mailto:connect@bolton.ac.uk).

### 14 **Changes to Our Privacy Policy**

We may change this Privacy Policy as we may deem necessary from time to time, or as may be required by law. Any changes will be immediately posted on Our Service and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Service following the alterations. We recommend that you check this page regularly to keep up-to-date.