

# ARETE PROJECT: PILOT 1 - APP PRIVACY POLICY

EU H2020 Research and Innovation Action programme - Grant Agreement No. 856533.

**PRIVACY POLICY for Arete PILOT 1 – AR-App**

**PERSONAL/RESEARCH INFORMATION for PILOT 1 App collected by ARETE Project.**

## **1. Description**

WordsWorth Learning Ltd, will provide access for each stakeholder that has volunteered to participate in this ARETE Project - Pilot 1 App to research whether the introduction of state-of-the-art Augmented Reality into the WordsWorthLearning programme will improve reading and spelling skills.

Your original personal data is reprocessed and pseudonymised before being made available and used to access the Pilot 1 App. This means you will not be identifiable, which is the responsibility of the DPO and Legal Team indicated in Section 3 below.

Your pseudonymised information will enable stakeholders, teachers and our research community, geographically spread across Europe (and beyond) to maintain a private space on the Internet where they can share research information, documents, participate in discussion fora, download software, subscribe to Joint Research Center (JRC) publications etc. Your data will be collected and further processed for the purposes detailed hereafter under point 2.

As the processing collects and further processes research data, Regulation (EC) 45/2001, of the European Parliament and of the Council of 18 December 2000 on the protection of individuals with regard to the processing of personal data by the Community institutions and bodies and on the free movement of such data, is applicable.

## **2. What personal/research information do we collect, what is the legal basis, for what purpose and through which technical means?**

### ***Identification Data:***

The App does not use cookies and does not collect personally identifiable information, it uses pseudonymised data collected for research purposes only, and for future App development. Each stakeholder accesses the App using a unique 6-digit ID and PW provided for the project. Registration and participation of data subjects are provided on a purely voluntary basis.

### ***Legal Basis of processing:***

The European Parliament and Council Decision of Horizon2020 - <https://ec.europa.eu/programmes/horizon2020/en/official-documents>

# ARETE PROJECT: PILOT 1 - APP PRIVACY POLICY

## ***Purpose of processing:***

The purpose of the processing of research data for the Arete Pilot 1 project is to provide secure access and information exchange, including management of: communications to users, reports, distribution of reports, information sharing within research interest, groups, etc.

## **Technical Information:**

The pseudonymised user data are collected through clicks and transmitted as xAPI statements via JSON files to a secure research data repository.

## **3. Who has access to your information and to whom is it disclosed?**

Access to the research data is only granted through User-Id & Password to appointed users:

Pilot 1 Data Controller information is:

Processing the personal data:

- UNW: Dr. Uwe Klug (Chancellor of the University of Wuerzburg), [uwe.klug@uni-wuerzburg.de](mailto:uwe.klug@uni-wuerzburg.de);

Processing the pseudonymisation and creation of ID & PW of personal data:

- EUN: Marc Durando (Executive Director of European Schoolnet), [marc.durando@eun.org](mailto:marc.durando@eun.org);

Processing of digitalised pseudonymised data transfer:

- WWL: WordsWorth Learning Ltd., (App Developer) 12 Priory Office Park, Blackrock, Dublin, A94 N2V3, Ireland. [contact@wordsworthlearning.com](mailto:contact@wordsworthlearning.com)

Pilot 1 Data Protection Officers information is:

- WWL: Rita Treacy, [rita@wordsworthlearning.com](mailto:rita@wordsworthlearning.com);
- UNW: Stefan Wettengel (Deputy Data Protection Supervisor at the University of Wuerzburg), [stefan.wettengel@uni-wuerzburg.de](mailto:stefan.wettengel@uni-wuerzburg.de), +49 (0)931 31-82545;
- EUN: John Stringer (Internal Auditor), [john.stringer@eun.org](mailto:john.stringer@eun.org);

Regular registered and approved Research Organisations by default have access to the pseudonymised research data produced in the App. No personal data is transmitted.

## **4. How do we protect and safeguard your information?**

The location where the data processing activities take place is as follows:

The data is stored on a secure server at <https://learninglocker.vicomtech.org>. The server is using AWS infrastructure and is physically located in Frankfurt, Germany. All the traffic sent to the server is encrypted and only the users with administrative rights can access it. Once Pilot 1 is completed, the data collected will be removed from AWS and safely stored on a secure server on Vicomtech premises, located in San Sebastian, Spain.

# ARETE PROJECT: PILOT 1 - APP PRIVACY POLICY

## 5. How can you verify, modify or delete your information?

Registered users are able to update it or to cancel their registration or to request to unsubscribe from this specific project, more information can be found at the following link <https://www.areteproject.eu/gdprpolicy>

## 6. How long do we keep your data?

Your personal/research data will remain in the database for a period of 6 years after the end of the project.

## 7. Contact Information

Should you have any queries concerning the processing of your personal/research data, please address them to: <https://www.areteproject.eu/gdprpolicy/>

## 8. Recourse

We are committed to the protection of your privacy while you use our Mobile App.

By continuing to use our Mobile App, you acknowledge that you have had the chance to review and consider this Privacy Policy, and you acknowledge that you agree to it. This means that you also consent to the use of your pseudonymised information and the method of disclosure as described in this Privacy Policy. If you do not understand the Privacy Policy or do not agree to it, then you agree to immediately cease your use of our Mobile App.

## 9. Third Parties

WordsWorthLearning provide some of your "pseudonymised" Data to a Third-Party Service Provider (Soapbox Labs) in order to help us track and improve individual student reading performance, we also use this information for research data. There is an option within the App to disable this feature, however this information helps us to improve reading skills. Information about their Privacy Policy can be found at this link <https://www.soapboxlabs.com/privacy/>.