

PRIVACY NOTICE FOR CAMBRIDGE SCIENCE PARK APP

Trinity College ("we", "us" or "our") places the highest value on protecting the personal data of the users ("User", "you" or "your") of our Cambridge Science Park App ("App"). This Privacy Notice ("Notice"), together with our Terms of Use (at <https://www.cambridgesciencepark.co.uk/about-park/>) explains how we collect, use, disclose, safeguard and retain your personal data when you access and use the App.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By using the App you are accepting the practices described in this Notice. If you do not agree with the terms and content of this Notice, you must stop using the App immediately.

OUR ROLE AS DATA CONTROLLER AND CONTACTING US

For the purposes of the Data Protection Act 2018 (and, for as long as it remains in force in the UK, the General Data Protection Regulation (EU) 2016/679) and any successor legislation applicable in the UK from time to time, (the "Data Protection Legislation"), we are the controller of your personal data. Therefore, we are responsible for the processing of your personal data and we define the purposes and means for the processing. Our identification and contact information are as follows:

Trinity College (CSP) Limited, c/o Bidwells, Trumpington Road, Cambridge, CB2 9LD

07540 100512

Contact: Jeanette Walker at jeanette.walker@cambridgesciencepark.co.uk

Data Protection Officer: Jeanette Walker at jeanette.walker@cambridgesciencepark.co.uk

Use the above contact information to reach us if you have any questions or requests related to your personal data or the processing of it.

PERSONAL DATA WE COLLECT

In order for you to register with and create an account for the App, you must provide us with the following personal data:

- your name
- your work email address
- biography text you may write on your profile
- photograph, which you may upload to your profile
- topics of your interest you may select for your profile
- gender if you select it

During your use of the App, we may collect some or all of the following types of personal data about you:

- synthetic identifiers and security tokens which authenticate you and associate your user account to an individual mobile, or other device you use the App with
- technical information about communication between your device and our servers (e.g. software version, phone model, timestamps)
- search terms you have used during your use of the App
- other users which you have contacted
- contacts and sessions you have "favourited"
- the number and duration of the phone calls you have made and received
- the number of messages you have sent and received and their contents
- groups which you have joined and/or created
- language you select from the settings
- endorsements you give or receive
- session reservations you make and cancel

Providing your personal data to us is voluntary but necessary for you to proceed with the access and use of the App. Failing to provide us with your personal data may prevent us from providing you with access to the App or enabling your use of the App.

We do not monitor the content of the communication between our users. Your messages are protected by data encryption and Voice over IP calls are not recorded or stored by us. You are therefore solely responsible for the relationships you establish via the App. We advise you not to provide any confidential information if you do not trust the other party in the App. Chat history remains accessible on both participating

users' devices and on our servers needed for the message content relay. In certain circumstances, we and third parties, such as law enforcement agencies, are technically capable of accessing the contents of private messages and identifying their senders and receivers personally.

OUR PERSONAL DATA COLLECTING METHODS

We may collect your personal data in a variety of ways. In order to create an account for use in the App, you will be required to actively submit to us your personal data through completing and submitting a digital form in any of our App interfaces available to you or by answering a questionnaire.

We may also collect your personal data in connection with your use of the App, as described above.

Our servers automatically collect your personal data of a technical nature when you access or use the App (e.g. software versions, phone model and timestamps) or of your actions that are integral to the App features (e.g. the number of messages you have sent and received, or other data based on your similar interactions with the App or with other users of the App).

Finally, in order to function as intended, the App will require access to the following mobile phone features, some of which are technically used as part of the above defined personal data collection methods:

- microphone;
- notifications;
- mobile data & wi-fi;
- storage;
- background modes;
- photos (optional); and/or
- camera (optional).

If you wish to change our access or permissions, you may, circumstances allowing, do so in your device's settings. However, please note that changing our access or permissions may cause limitations or complete denial of your access to and use of the App.

HOW WE USE YOUR PERSONAL DATA AND OUR LEGAL BASIS FOR DOING SO

We process your personal data for the following purposes and, for each purpose, such processing is justified by the corresponding legal basis:

Purpose	Legal basis
To enable you to create an account to use the App and thus enable us to provide the App to you	The processing is necessary for the performance of the contract between you and us for the provision of the App (please see our Terms of Use at https://www.cambridgesciencepark.co.uk/about-park/)
To develop the App as well as our other products and services	The processing is necessary for the performance of our legitimate interests in developing the App and/or other products and services
To conduct scientific and academic study	The processing is necessary for the performance of our legitimate interests in conducting such research
To conduct statistical analysis about the use of the App and its use by Users. This may include, for instance, network analysis, behavioural pattern recognition and development of new data models	The processing is necessary for the performance of our legitimate interests in conducting such analysis for the future development of the App and our products
To provide you with personalized content and communication (including personalized push notifications to your mobile device). This content and communication may include, but is not limited to, event information, personalized recommendations, customer relations communication, feedback and research.	The processing is necessary for: (a) the performance of our contract with you in providing the App and associated information; and/or (b) the performance of our legitimate interests in providing feedback and conducting research
To provide you with certain marketing with respect to products and services which may be of interest to you	The processing is necessary for the performance of our legitimate interests in providing you with information about products and services which may be of interest to you

DISCLOSURES AND INTERNATIONAL TRANSFERS

We may disclose your personal data to the following recipients for the following purposes and on the following legal bases:

1. to certain of our employees for the purposes of providing the App to you in accordance with our contractual obligations to do so;

2. to selected third parties (e.g. subcontractors) who will process your personal data on our behalf in our performance of our contract with you; and
3. to our professional service providers, such as accountants, auditors, legal advisers and insurance brokers; and

We may also disclose your personal data to any competent law enforcement body, regulator, government agency or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation; (ii) to exercise, establish or defend our legal rights; and/or (iii) to protect your vital interests or those of any other person.

RETENTION OF YOUR PERSONAL DATA

We retain your personal data until the termination or expiration of the contract between us. Your personal data will be anonymized or permanently deleted after the termination or expiration of the contract subject to allowing us additional limited time necessary for the technical execution of the deletion or anonymization.

Notwithstanding the above, the retention of your personal data may always be extended due to our existing or imminent need to establish or exercise legal or administrative claims or defend us against legal or administrative claims related to your personal data, its processing and/or the App, to process and resolve complaints, for use in criminal proceedings, or for any other reason permitted under applicable laws.

INFORMATION SECURITY

We apply appropriate administrative, technical and organisational security measures to protect your personal data that is under our control from unauthorised access, collection, use, disclosure, copying, modification or disposal. All information you provide to us is stored on secure servers within the European Economic Area. We also take steps to ensure that any service provider that we engage to process personal data on our behalf takes appropriate technical and organisational measures to safeguard such personal data.

USE OF COOKIES

To improve your experience on our site, we may use small text files known as cookies 'cookies', which your browser stores locally on your computer.

Cookies are an industry standard and commonly used by most websites. A cookie is a small text which, which is used as a tool to remember your interactions and preferences on our website. You can prevent the use of cookies by altering your web browser privacy settings accordingly, but should you choose to do this, the App may not function as effectively or at all.

You might be particularly interested to know which third party services and cookies we use. Please be noted that our site uses Google Analytics, which helps us to understand our website traffic and usage of the App.

While we do not have the direct capability to identify individual users using our App, or associate your IP address to you personally, it is possible that other parties, like Google and your Internet Service Provider has access to other data sources which can be used to identify you personally. Google Analytics is registered in the United States and statistics about our App usage data is sent to Google servers in the United States.

If you have any privacy concerns related to our use of cookies, our partners or data transfers to the United States, please take appropriate measures with your privacy settings.

YOUR RIGHTS

Under the Data Protection Legislation:

1. you have the right to access personal data that we hold about you. Your right of access can be exercised in accordance with the Data Protection Legislation. You can submit a data access request at any time. In order to do this, please contact us using the contact details provided above;
2. if you become aware of any inaccuracies in your personal data which we process about you, you have a right to ask us to rectify the inaccuracies;
3. to the extent that (a) we no longer need to use your personal data (e.g. you no longer wish to use the App) for purposes described in our Notice and/or Terms of Use, or (b) we rely on your consent and you have withdrawn it, or (c) you object to our legitimate interests for using your personal data and no exception applies to permit us to keep using it, or (d) it is established that we did not have the lawful right to process your personal data, or (e) the law requires us to erase your personal data, you may ask us to erase your personal data. If we erase your personal data, your ability to use the App will be affected, as described above;
4. you have the right to object to our processing of your personal data to the extent that (a) we use the personal data on grounds of our legitimate interests and no exception applies to permit us to keep using it, or (b) we use it for direct marketing purposes, or (c) we use it for scientific or historical research purposes or statistical purposes and no exception applies to permit us to keep using it;
5. you have the right to ask us to restrict our processing of your personal data to the extent that (a) you have questioned the accuracy of the personal data and we are still checking its accuracy, (b) it is established that we did not have the lawful right to process the personal data, (c) we no longer need to use your personal data for the purposes we collected or used it for but

you need it to be preserved for the purposes of legal claims, or (d) you have exercised your right to object to our use of your personal data and no exception applies to permit us to keep using it;

6. if we rely on your consent for processing your personal data, you can withdraw your consent at any time;
7. you have the right to complain to the Information Commissioner (<http://www.ico.gov.uk/>) if you have any concerns in respect of our handling of your personal data.

If you would like to exercise any of the above rights, please contact us using the contact details provided above.

VALIDITY OF AND UPDATES TO THIS NOTICE

This Notice is valid until further notice beginning from the Effective Date.

We reserve the right to make changes to this Notice at any time and for any reason. We will alert you about any changes by updating the "Effective Date" of this Notice and by notifying you via the App or otherwise in the event of such an update. You should therefore periodically review this Notice to stay informed of updates.

You will be deemed to have been made aware of, will be subject to, and will be deemed to have accepted the changes in any revised Notice by your continued use of the App after the then current Effective Date.

Version: 1

Effective Date: 29 November 2019