# Privacy Statement

## Introduction

We are committed to protecting and respecting your privacy. This privacy notice is for people who use the SURE Recovery app. It tells you what we will do with your personal data.

We will treat your data in accordance with the EU General Data Protection Regulation and Data Protection Act 2018.

When we collect or use your data, King's College London is the 'data controller' and Mindwave Ventures are the 'data processor'. This means that King's College London decides how and why your data is processed and Mindwave Ventures act only on instructions from the data controller.

We strongly recommend that you take some time to read this policy carefully to understand how we treat your personal data. Contact details for the data controller can be found at the bottom of this notice.

More information can be found on the King's College London Statement on Use of Personal Data in Research at: https://www.kcl.ac.uk/research/support/rgei/research-ethics/kings-college-london-statement-on-use-of-personal-data-in-research

## What personal information do we collect?

We collect information directly from you in two ways:
1. During sign up
2. While carrying out activities on the app

You have a choice about the data we collect. However, some information will need to be provided in order to have a SURE Recovery account:

- Email address (mandatory)
- Password (mandatory)
- Sex at birth (mandatory)
- Date of birth (optional)
- Country of residence (optional)

When you are asked if you want to provide data within the app, for example in completing the questionnaires, you may choose what data you wish to share and can decline to answer.

### Networks and Devices
We do not collect or store your internet address (IP address).

## How do we use this information?

### Communication with you

We can use cookies or your shared information to send you communications about our service, for example via notifications, or to let you know about any changes to our terms of service or privacy statement. We also use your information to respond to you if you contact us.
Communications will only relate to the service provided by the SURE Recovery App.  We will not sure your data for marketing purposes.

### Promote security

We use the information you have provided to verify your account and to promote safety and security by investigating suspicious activity or violations to our terms of service.

### Improvement and development

From time to time we may conduct surveys to better understand how to improve the features of this service.

### What else do we collect?

We will securely store information you put into the app, to allow your account to function fully. Anything you input to SURE Recovery will be held in confidence.

## How is your information shared?

The data controllers will not share your data with other organisations without your consent, unless the law permits us to do so. We will share data only with our authorised data processors, who must act at all times on our instructions as the data controllers under the Data Protection Act 1998. Before you submit any information, it will be made clear to you why we are asking for specific information, and it is up to you whether you provide it. The data controllers do not and will never sell any data.

Our data processors are:

**Mindwave Ventures:** Mindwave Ventures are our design and development partners who worked with the King's College London team to build the app.  Mindwave also provides ongoing support and maintenance to keep the app running.  Their privacy notice can be found at: https://mindwaveventures.com/privacy-policy/

**Microsoft Azure**. Microsoft Azure are a cloud computing service created by Microsoft for managing applications and services. Mindwave Ventures, who co-designed and co-developed SURE Recovery, use Azure to manage SURE Recovery and store its contents. Microsoft only store data in the UK.   Their privacy notice can be found at: https://privacy.microsoft.com/en-gb/privacystatement

**Google Analytics**. We use Google Analytics to monitor use of SURE Recovery. This data is anonymous and provides us with an aggregated dataset of usage data from which you cannot be identified. Their privacy notice can be found at: https://policies.google.com/privacy?hl=en-US

If you choose to take part in research in the SURE Recovery app, we will also collect your responses to questions within the app. These will be used for research at King's College London. These data will be analysed anonymously. This is optional, and you can decline.

## How long do we retain your personal data?

Your personal data will be held and processed as long as you have a SURE Recovery account. If you close your account, your data will be deleted immediately from our Microsoft Azure store. However, if you have consented to participate in research some of your data will remain in a database at King's College London. Based on the information stored in this database, it is unlikely that we will be able to personally identify you and therefore we will not be able to delete your data from this location. King's College London will hold this data for three years after the end of the research period (1st January 2031). This data will only be shared with researchers employed by, or collaborating with, King's College London and will not be shared with any third parties.

## How will we notify you of changes to this policy?

We will notify you when we make any changes to this policy and invite you to review and consent before continuing to use the service.

## How to contact us with questions or concerns

If you have any additional questions regarding this policy, please feel free to contact us using the details below.

## Your rights

Some of these rights can be exercised by you in the app.  For all others, please contact us using the details at the end of this policy.

### Right to be informed
This policy and the SURE Recovery app itself gives you information about what we do with your personal data.   If you have any additional questions, please contact us.

### Right to access
You have the right to request access to your personal data which we hold. You can view some of your data in the app.  You can request a full set of data by submitting an information request, free of charge.

### Right to rectification
Some of your data can be edited in the app by you.  If you believe that any other part of your personal data is inaccurate or incomplete you have the right to ask for this to be corrected.

### Right to erasure (right to be forgotten)
In some circumstances you may ask us to erase your account and data which the account contains. However, there are some situations whereby we would be unable to erase your data, such as when we need to comply with regulatory requirements.

### Right to restriction of processing
If certain conditions apply, you have the right to restrict the processing of your information. Which includes:
- If you contest it as being inaccurate
- When processing your data has been unlawful but you decide against erasing your data
- If we no longer need your data for the original purpose it was obtained, but you require us to hold it to establish, exercise or defend a legal claim.

### Right of portability
In certain circumstances you have the right to move, copy or transfer your personal data to another organisation This works slightly differently from your right of access as you may be entitled to the same amount of information under the right of portability as you would be entitled to under the right of access.

### Right to object
You have the right to object to us processing your data unless we can demonstrate legitimate grounds for processing your data or if the processing of your data is for the establishment or defence of a legal claim.

Note.  Rights under GDPR relating to automated decision making and profiling do not apply as SURE Recovery app does not carry out any automated decision making and/or profiling.

## How do we respond to legal requests?

We may be required under law to share your information if there is a legal request with which we much comply such as a search warrant or court order.

## How will we notify you of changes to this policy?

We may amend this policy in the future to ensure it is kept up to date with legal requirements. We will notify you when we make any changes to this policy and invite you to review before continuing to use SURE Recovery.

## How to contact us with questions or concerns

If you have any additional questions regarding this policy, would like to exercise one of your rights under GDPR, or need more information, please feel free to contact us at:

info-compliance@kcl.ac.uk

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