SaferSpace

Privacy Notice



saferspace.io

1. Introduction

SaferSpace IO Ltd ("we", "us" or "our"") is responsible for processing your personal data when you use the SaferSpace App (the "App") and set up an account with us. SaferSpace IO Ltd (registration number: 15002207) is registered in England and Wales, with registered address at Old Rectory, South Kilvington, Thirsk, North Yorkshire, YO7 2NL, and is an affiliate of EducationScape Ltd.

This Privacy Notice ("**Notice**") describes how we will collect, use, share and otherwise process your personal data in connection with your use of the App, including your App account.

The App is made available to organisations that purchase or otherwise acquire a valid licence or subscription for the App (the "**Licensed Organisation**"). The App is designed solely to enable users to report workplace or campus misconduct (including sexual harassment, discrimination, bullying and other harmful behaviours) either anonymously or openly, and to upload supporting evidence such as videos, images, or other documents (collectively, "**User Content**").

2. What does this Notice cover?

This Notice only relates to the personal data you provide to us in order to set up and maintain an account on the App.

Please read this Notice carefully to understand our practices regarding your personal data and how we, as the data controller, will treat it.

This Notice does not cover any personal data included in any User Content you upload via the App. Your Licensed Organisation is solely responsible for determining how such personal data will be processed and used. Before you use the App, we recommend that you read the privacy notice provided by your Licensed Organisation to understand how they process and use any personal data included in User Content.

3. What personal information do we collect

- Identity Data such as your first name, last name;
- Contact Data such as your email address, your communication preferences and copies of the communications between you and us;
- **Profile Data** such as your username and password;
- Device information such as your IP address;
- **Usage Data**: logs and detail of your use of the App being the dates and times on which you download, access and update the App, any error or debugging information; and
- Feedback Data: your feedback and survey responses.

We do not intentionally collect any special categories of personal data about you; however your Licensed Organisation may collect this data. Please see their privacy notice for more information on how your Licensed Organisation processes personal data about you.

4. How is your personal data collected

We collect your personal data in the following way:

- **Registration.** We collect your Identity Data and Contact Data when you register an account with us to use the App.
- Communications. When you communicate with us via email [or via the App].

5. How we use your personal data

We will only use your personal data when we have a lawful basis to do so. Most commonly we will use your personal data in the following circumstances:

- Where you have consented before the processing. You can withdraw your consent at any time by contacting us at support@saferspace.io.
- Where we need to perform a contract, we are about to enter or have entered with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

6. Purposes for which we will use your personal data

Purpose or activity	Type of personal data	Lawful basis for processing
To administer, monitor and improve our business and the App, including troubleshooting, data analysis and system testing	Data relating to your identity, contact details and device	Legitimate interests (for running our business, provision of administration and IT services, network security, maintaining the security of the App, providing a secure service to users and preventing fraudulent and other misuse of the App)
Applying security measures to our processing of your personal data, including processing in connection with the App	All personal data under this Notice	Legitimate interests (network security)
Otherwise monitoring use of the App and deploying appropriate security measures	Data relating to your identity, contact details and device	Legitimate interests (running our business, provision of administration and IT services, network security, maintaining the security of the App, providing a secure service to users and preventing fraudulent and other misuse of the App)

To notify you of changes to the App and the App Terms of Use	Data relating to your contact information	Performance of a contract Otherwise, legitimate interests (in servicing our users and prospective users)
To notify you of updates to this Notice	Data relating to your contact information	Legal obligation (to inform you of our processing under Articles 13 and 14 of the UK GDPR and the EU GDPR, as applicable)
To otherwise respond to your enquiries, fulfil your requests and to contact you where necessary	As relevant to your enquiry or request	Legitimate interests (service our users and prospective users)

7. Disclosures of your personal data

We may share your information with data hosting providers and IT service providers who support on ensuring the App is fully functional.

8. International transfers

We do not transfer your personal data outside the UK OR EEA. All information you provide to us is stored on our secure servers and located in the UK OR EEA.

9. Third party links and sites

The App may, from time to time, contain links to and from the websites of third parties, such as https://www.gov.uk/guidance/equality-act-2010-guidance. Please note that these websites (and any services accessible through them) are controlled by those third parties and are not covered by this Notice. You should review the privacy notices of those third parties to understand how they use your personal data before you submit any personal data to these websites or use these services.

10. Data security

Where you have chosen a password that enables you to access certain parts of the App, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Once we have received your information, we will use strict procedures and security features to protect your personal data from loss, unauthorised use or access.

We have put in place procedures to detect and respond to personal data breaches and to notify you and any applicable regulator when we are legally required to do so.

11. Data retention

We will retain your personal data, through your account creation on the App. Following deletion of your account, it may take up to 30 days to fully delete your personal data and system logs from our systems. Additionally, we may retain information to comply with the law, prevent fraud, collect fees, resolve disputes, troubleshoot problems, assist with investigations, enforce our App <u>Terms of Use</u> and take other actions permitted by law. Any personal data we retain will be handled in accordance with this Notice.

Once we no longer have a legal right to hold your personal data, we will securely delete or, in some circumstances, we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

12. Your legal rights

Subject to certain conditions, you have the following rights under data protection laws in relation to your personal data.

- Access. Request access to and/or a copy of the personal data we process about you (commonly known as a data subject access request).
- **Correction.** Request correction of any incomplete or inaccurate data we hold about you. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during our relationship with you. Please go to the 'Settings' section in the App to update your details.
- **Deletion.** Request us to delete or remove personal data where there is no lawful reason for us continuing to process it. You also can ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we have processed your information unlawfully or where we need to erase your personal data to comply with law.
- **Objection.** Object to us processing your personal data where we are relying on legitimate interests as the lawful basis, and you feel the processing impacts on your fundamental rights and freedoms.
- **Restriction.** Request that we restrict or suspend our processing of your personal data. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Data portability**. Request we transfer certain of your personal data to you or your chosen third party in a structured, commonly used, machine-readable format.
- **Withdraw consent**. Withdraw your consent at any time where we are relying on consent to process your personal data.

You can exercise any of these rights at any time by contacting us using the contact details set out in Section 15 below.

13. Complaints

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. The ICO's address is: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. ICO Helpline number: 0303 123 1113. ICO website: https://ico.org.uk/make-a-complaint/. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please do feel free to contact using the details in Section 15 below in the first instance.

14. Changes to the privacy notice

We keep this Notice under regular review. This version of the Notice was last updated on 14/04/2025. We reserve the right to modify this Notice at any time. Please review it occasionally. If we make changes to this Notice, the updated Notice will be posted on the App in a timely manner and, if we make material changes, we will provide a prominent notice. If you object to any of the changes to this Notice, you should stop using the App and delete your account and the App from your mobile device.

15. Contacting us

If you would like further information about any of the matters in this Notice or if you have any questions about how we collect, store or use your personal data, you may contact us by emailing support@saferspace.io or writing to Old Rectory, South Kilvington, Thirsk, North Yorkshire, YO7 2NL.

SaferSpace

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