

We are Uni Surf Ltd, a company registered with Companies House in England and Wales under number 09836643, operating under the trading name 'Unisurf'.

Unisurf provides a mobile application which enables university students to network with each other within their institution, and receive relevant information directly from their university.

We are committed to protecting and respecting your privacy. This is of paramount importance to us. By using our App and the Services, you consent to us processing your personal data in accordance with this Unisurf Privacy and Cookie Policy.

This Policy explains:

- what information we may collect about you;
- how we may use the information we collect about you;
- whether we share your information with anyone else;
- the types of cookies we use and how you can reject these cookies;
- your choices regarding the personal information you provide to us;
- where we store your information; and
- how we keep your information secure.

WHEN DOES THIS POLICY APPLY

This Policy and our terms of use apply to your use of the App once you have downloaded a copy of it onto your mobile telephone or handheld device. The Policy and the Terms of Use also apply to the Services.

HERE IS THE INFORMATION WE MAY COLLECT ABOUT YOU

1. Information you voluntarily provide

- Information that you voluntarily provide on our App including when you download the App, register to receive the Services and create a profile. During the registration process, you will be asked to provide us with certain information about yourself.

- When creating your profile, you may provide us with information directly through the App or, with your consent, via your Facebook or other social media account.
- We may also ask you for information when you report a problem with our App or Services.
- If you contact us (by phone, email or through the App), we may keep a record of that correspondence.
- Information you provide when you choose to complete a survey or participate in a competition on the App.

2. Information we collect about you and your Device

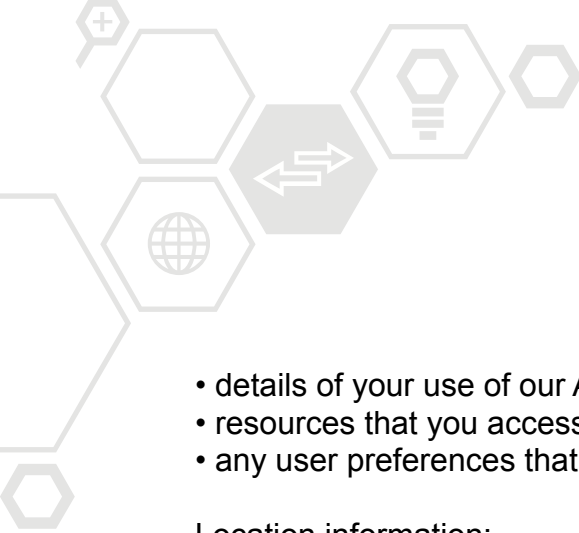
When you visit our App interact and with our Services, we (and other third party service providers) may use a variety of technologies that automatically or passively collect information about how our Services are accessed and used including:

Technical Device information:

- the type of mobile device you use (e.g. are you using an Apple or a Samsung Device);
- a unique device identifier (for example, your Device's IMEI number, the MAC address of the Device's wireless network interface or the mobile phone number used by the Device);
- mobile network information (e.g. are you on the 3 network or the Vodafone network?);
- your mobile operating system (e.g. are you using an iPhone or an Android?);
- your IP address and HTTP referrer information;
- the type of mobile browser you use (e.g. are you using the Chrome or Safari browser?); and
- time zone setting (e.g. GMT).

Other information stored on your Device:

- contact information;
- friends lists;

- 
- details of your use of our App or Services; and
 - resources that you access;
 - any user preferences that you have configured.

Location information:

We may also use technology and/or the information you provide us (e.g. post code) to determine your current location.

User-generated content:

Any content that you create using our App (such as reviews) is stored on servers which we use; some of that content is also cached locally on your device. Unisurf considers such content as non-confidential and non-proprietary.

3. Information we collect about you and your Device

We work closely with third parties which provide a variety of services. Below is a non-exhaustive list of third parties we work with. We may work with third parties not listed below or stop working with the third parties listed below. Name of Third Party and Why we work with them:

Facebook – To allow you to sign in with your Facebook credentials and import friends from your Facebook friend list.

Google Analytics – To monitor App performance & user experience.

THIS IS WHAT WE DO WITH THE INFORMATION WE COLLECT ABOUT YOU

We use the information you provide to us to:

- provide you with relevant information and enable you to use our App and Services
- ensure that content from our App is presented in the most effective manner for you and for your Device to achieve the most user-friendly navigation experience;

- carry out our obligations arising out of the Terms of Use such as enabling us to use the services of third party information verification providers;
- send marketing communications to tell you about developments in our Services. We will only do this where you have indicated you would like to receive updates.
- notify you about changes to our App or Services.

Where we propose using your personal information for any other uses we will ensure that we notify you first. You will also be given the opportunity to withhold or withdraw your consent for the use of your personal information for purposes other than those listed above.

OUR — USE OF AGGREGATED AND ANONYMISED INFORMATION

We may provide aggregate user statistics, demographic information and other usage data which does not identify you specifically with third parties. We may combine your data with those of other users of our App and share or provide this trend information in aggregated and anonymised form with third parties.

We may also use information collected from you and combine it with information provided by other users of our App and Services to help us improve the design and delivery of our software tools, increasing the effectiveness for all users.

THIS IS WHO WE SHARE YOUR INFORMATION WITH

We will only share information with other organisations where we have your permission to do so in accordance with this Policy or where we believe it is necessary for a legitimate reason connected with the App or our Services.

We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and/or its subsidiaries, as defined in section 1159 of the Companies Act 2006.

We may disclose your personal information to third parties:

- if we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request;
- to enforce or apply our Terms of Use and other agreements or to investigate potential breaches; or
- to protect the rights, property or safety of Unisurf or our users.

COOKIES, PIXELS, LOCAL STORAGE AND OTHER SIMILAR TECHNOLOGIES


Cookies are small pieces of data that are stored on your computer, mobile phone or other device. Pixels are small blocks of code on web pages that do things like allow another server to measure viewing of a Web page and often are used in connection with cookies. HTML5 Local Storage is a small database located inside your browser which web pages can use to store data to speed up their processing. We may use all three technologies from time to time, to help improve your user experience.

Cookies do lots of different jobs, like letting you navigate between pages efficiently, storing your preferences, and generally improving your experience of our App. Cookies make the interaction between you and our App faster and easier. We use cookies to distinguish you from other users of the App and our Services. This helps us to provide you with a good experience when you use the App and also allows us to improve the App and Services. Cookies and things like local storage also help us authenticate you to deliver personalised content.

We have outlined below the individual cookies we use and why we use them:
Cookie name & expiry period:

ga – 2 years – used by Google Analytics to distinguish users (for more information see Google Analytics Cookie Usage);
_gat – 10 minutes – used by Google Analytics to manage request rate (for more information see Google Analytics Cookie Usage);

Please refer to your Device's help material to learn what controls you can use to remove or block cookies, or other similar technologies; or block or remove other data stored on your Device. Please remember that if you do this, it may affect



your ability to use the App and/or the Services. As you use your Device, you will encounter third parties that make use of cookies and similar technologies. We are not responsible for those third parties or what they may place on your Device or in your browser.

THIS IS WHERE WE STORE YOUR INFORMATION

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (EEA). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. These staff may be engaged in the fulfilment of your request, and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing.

KEEPING INFORMATION SECURE

All information you provide to us is stored on servers owned and operated by Google, using its Google Cloud Services (Firebase).


Where we have given you (or where you have chosen) a password that enables you to access the App, you are responsible for keeping this password confidential. Please do not share a password with anyone.

Please remember that the transmission of information via the internet is not completely secure. We will do our best to protect your information, but we cannot guarantee the security of your data transmitted to the Apps or when you use our Services. Any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

HERE ARE YOUR RIGHTS

We think it is important that you are able to control your personal data.

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to



use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by ticking certain boxes on the forms we use to collect your data.

The law gives you the right to request a copy of the personal information we hold about you and to have any inaccuracies corrected. We may charge £10 for information requests and we require you to prove your identity with 2 pieces of approved identification. We will use reasonable efforts to supply, correct or delete personal information about you on our files.

If you want to stop using the App, you can simply delete the App from your Device by following the instructions on your Device. This will remove any data stored locally on your device by the App.

If you indicate to us that you want to delete your account, we will remove your details. We may (or may not) also remove content generated by you through the App. This process is irreversible.

UNIVERSITY/INSTITUTION RIGHTS

An institution cannot be held responsible for any misconduct displayed by users on Unisurf, however each institution will endeavour to protect their institutional community.

Any personal thoughts or views shared by users on Unisurf is not representative of the institution's beliefs.

In cases of potential harassment or abuse, Unisurf may give an institution access to conversations between users.

CODE OF CONDUCT

There is no tolerance for objectionable content or abusive users. Should your account be reported, It could lead to the permanent termination of your account.

THIRD PARTY PROPERTIES ACCESSED FROM THE APP

Our App and Services may contain links to and from the online properties of advertisers and other third parties. If you follow a link to any of these online properties, please note that these online properties have their own privacy policies and that we cannot and do not accept any responsibility or liability for these policies or for any personal data that may be collected through these online properties. Please check these policies carefully before you click on any links and/or submit any personal data to these online properties.

CHANGE OF CONTROL

If the ownership of our business changes, we may transfer your information to the new owner so they can continue to operate the App and provide the Services. The new owner will be obliged to comply with this Policy.

CHANGES TO OUR POLICY

Any changes we may make to this Policy in the future will be posted on this page. Where it makes sense because the changes are material, we will notify you of the changes by e-mail or in another appropriate manner such as when you next start the App.

8th December 2019