

Parent Positive Privacy Notice

Introduction

Parent Positive is an app used in the SPARKLE trial organised by researchers from King's College London (KCL) and the University of Oxford (Oxford).

KCL and Oxford determines how and why your personal data is processed for *Parent Positive*. This means that KCL and Oxford are 'controllers' of your data for the purposes of data protection law.

Please read this Privacy Notice carefully – it describes why and how we collect and use personal data and provides information about your rights in accordance with the general data protection regulation (GDPR). It applies to personal data provided to us by individuals themselves or by third parties, and it supplements the following wider KCL Privacy Notice(s):

- [KCL Core Privacy Notice](#)
- [KCL Statement on Use of Personal Data in Research](#)
- [Oxford Policy on Data Protection](#)
- [Oxford Data Protection and Research Guidance](#)

We keep this Privacy Notice under regular review. It was last updated on 3rd February 2020.

The types of personal information we collect

Personal data, or personal information, means any information about an individual from which that person may be identified. It does not include data that cannot be traced back to you (i.e. anonymous data). We will collect, use, store, retain and transfer the following personal data about you:

- email address
- phone number
- IP address
- device ID

How we collect and use your personal data

Most of the personal information we process is provided to us directly by you through the online forms that you complete. We also receive personal information indirectly from the *Parent Positive* app.

We will only use your personal data when the law allows us to. We use this information for the following purposes:

- To register you as a study participant and give you access to the *Parent Positive* app
- To keep in touch with you about the app and its performance
- To send you information about new versions of the app.

The processing is based on your consent, you have the right to withdraw your consent at any time by contacting us using the details set out below. Please note that this will not affect the lawfulness of processing based on consent before its withdrawal.

We may also use pseudo-anonymised data (linked using a unique ID), meaning data from which you cannot be identified, for the purposes of:

- Education and research
- Publication in reports or journals and at conferences.

How we store your data

Email addresses, phone numbers and Device IDs necessary to create a *Parent Positive* account will be collected by Amazon Web Services, Google and Apple servers. IP addresses used to collect usage data will be collected by Amazon Web Services. After data collection has been completed, *Parent Positive* usage data will be downloaded and transferred to the restricted-access folder on the King's College SharePoint and the AWS account and all the data contained within the account will be deleted. Usage data held within AWS will be pseudo-anonymised and the kind of information stored within the platform will be generally of non-identifiable nature. It is expected that data will be held within AWS for the period of 6 months.

We have technical and operational security measures in place to prevent your personal data from being accessed, used, altered, or disclosed in an unauthorised way. We have established procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. We will keep your personal data according to the [KCL](#) and [Oxford](#) Retention Schedule after which point it will be securely destroyed.

Who will process your personal data?

Your personal data will be collected and processed by the University of Oxford and Amazon Web Services; access to your personal information is limited to staff who have a legitimate need to see it for the purpose of carrying out their job. We will also need to share your personal data with the parties set out below. When we allow them access to your data, we do not permit them to use it for their own purposes.

Toad Ltd. (to help resolve any technical issues)
Google
Apple

We vet all third parties and require them to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes – they are only allowed to process your personal data for specified purposes in accordance with our instructions as outlined above.

We will not transfer your personal data outside the European Economic Area (EEA).

Lawful basis for processing

Data Protection legislation requires that we meet certain conditions before we are allowed to use your data in the manner described in this notice, including having a "lawful basis" for the processing.

The lawful bases for processing your personal data will be public task - “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller”.

Your rights

Under certain circumstances, you may have the following rights under data protection legislation in relation to your personal data:

- Right to request access to your personal data;
- Right to request correction of your personal data;
- Right to request erasure of your personal data;
- Right to object to processing of your personal data;
- Right to request restriction of the processing your personal data;
- Right to request the transfer of your personal data; and
- Right to withdraw consent.

If you wish to exercise any of these rights, please contact us using the details set out below

Contacting us

You can contact SPARKLE team by:

- emailing at SPARKLE@kcl.ac.uk;
- telephoning on +44(0)20 7848 5260, or
- writing to:
SPARKLE Trial Manger
Department of Child and Adolescent Psychiatry-PO85
Institute of Psychiatry, Psychology & Neuroscience
King's College London
16 De Crespigny Park
London SE5 8AF

Additionally, KCL has appointed a Data Protection Officer. If you have any questions about this Privacy Notice, including any requests to exercise your legal rights, you can contact our Data Protection Officer using the details set out below:

Email: info-compliance@kcl.ac.uk

Telephone: +44(0)20 7848 7816

Postal Address:

Data Protection Officer
Department of Business Assurance
King's College London
Room 5.35
James Clerk Maxwell Building
57 Waterloo Road
London SE1 8WA

Complaints

If you wish to complain about our use of personal data, please send an email with the details of your complaint to the Data Protection Officer so that the issue can be investigated.

You also have the right to lodge a complaint with the Information Commissioner's Office (**ICO**) (the UK data protection regulator). For further information on your rights and how to complain to the ICO, please refer to the [ICO website](#).