

DATA POLICY

What data are we collecting?
Why? Where is it stored?



Explanation aimed at our users,
however parents and teachers can enjoy too!



OUR POLICY LINKED TO PERSONAL DATA

At Studytracks, we have always paid strict attention to collection of personal Data, their use and their security. Our business model is not based on data generation and analysis but on membership. This document aimed at explaining in a simple and transparent way what data is collected and used but also why and how. It does not replace the Data Policy available on the App. But it does provide a summary of the key information to keep in mind.



WHO ARE OUR USERS?

Studytracks is an app developed mainly for students from 13 to 18 years old and their teachers.

We do cover the following exams currently:

- → **UK: AS Level and GCSE**
- → **USA: SAT**
- → **France: Brevet des collèges**

There are 2 “types” of users:



• **STUDENTS WHO DOWNLOAD AND USE THE APP DIRECTLY**

To access Studytracks, you must be at least 13 years old in the UK and USA and 16 years old in France otherwise, the approval of your parents or guardians is mandatory. In France and the UK, you will need to provide us with their email address for them to validate the registration via a verification code we will send them.



• **Students who get access to the App via their school who have subscribe to the service on their students behalf.**

In this case, the school will organise the registrations of the students with our help.

DATA YOU GIVE US

In order to register and access to the App, you will need to provide us with:

- Your Email or Facebook ID
- The exam you want to study
- A Username
- A Password (we do not see this information)

If you are based in the UK, you will also need to tell us whether you are over 13 years old. If it's not the case, you will be required to provide the email of your parents or guardians for us to confirm their approval in order to finalise the registration.



You will also be able to update your profile on the app, but it's not mandatory at all, by giving us:

- First name
- Last name
- Date of Birth
- Country
- Picture of your choice

We should also draw your attention to the fact that when asking us a question via email or social media networks, we may need to ask you more information to answer your question properly such as your internet provider, your device characteristics etc ... However, it will only be aimed at answering you correctly and provide you with the best service possible.



For users who get access via their school, the teachers will often give us last names, first names and class of their pupils to effectively use the Studytracks school platform.



However this is not mandatory at all, only if they deem it helpful. It's not ideal for the teacher, but the platform can be operated by using just a username. In any case, the accounts and the data of the users can be erased, at the end of the year or at any time by the teacher.



DATA WE COLLECT

Each time you use the App, we automatically collect the following data regarding your activity:



- **The brand of your device and its operating system.**
Example iPhone 7 with IOS 11
- **Tracks you listened to**
- **Test you took and your scores**
- **Your favorites and playlists**
- **If you have shared the app on social media**
- **And, for users coming from schools: Homework completed**

WHY?

- 1  To enable you to use **the features of the App**
- 2  To make sure the App is presented in **the most effective way**
- 3  **To administer the App**, including troubleshooting
- 4  **To analyse the activity** on the App
- 5  **To know your usage** and give you Points
- 6  To enable you to use **the interactive features**
- 7  To maintain the **App's security**
- 8  To make you aware of **changes and improvements**
- 9  To allow **teachers** to follow and analyse your activity



WITH YOUR EXPRESS AGREEMENT, we will send you information regarding new services and updates.



However, as far as users who get access via their schools, we will not send them any promotional emails of any kind, full stop.

YOUR RIGHTS

You want to exercise your rights?

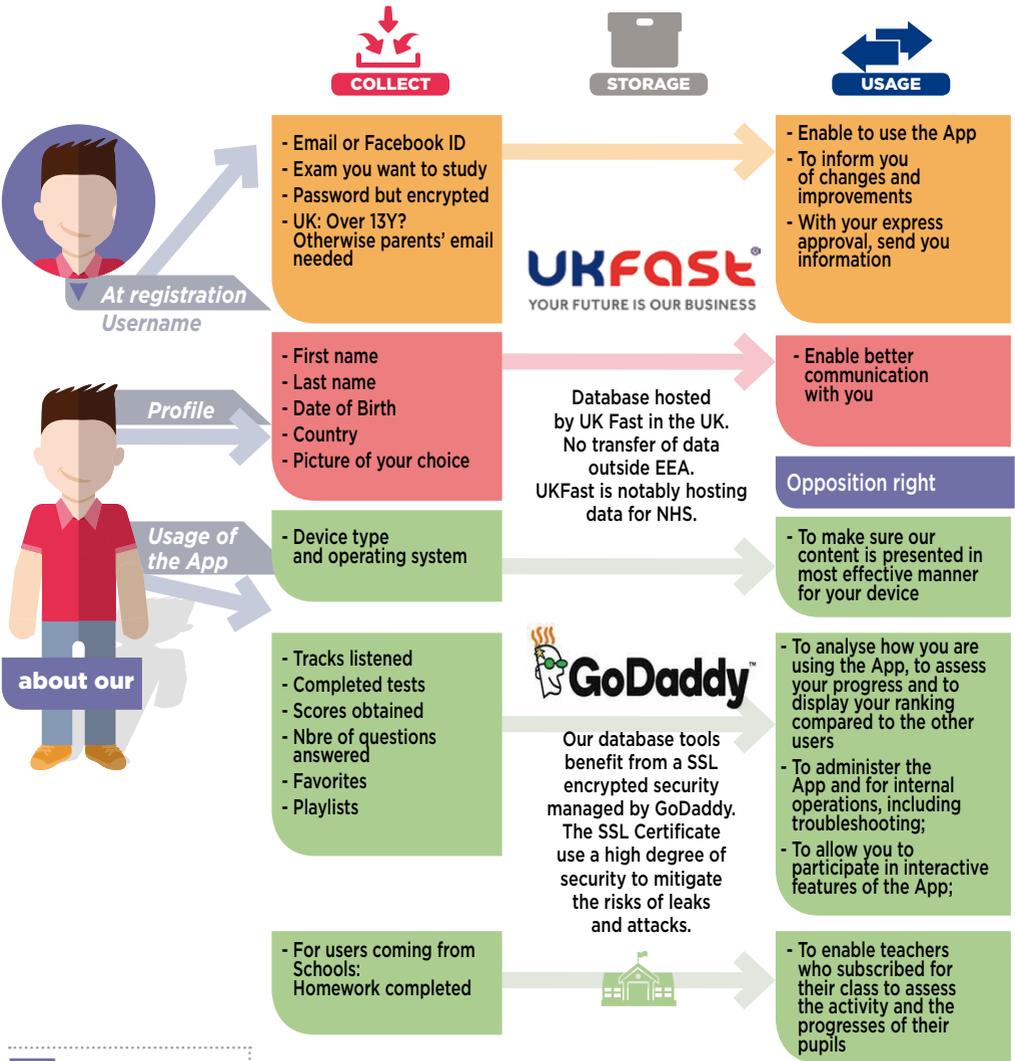
Simply send us a request on info@studytracks.co

- **Right to access:** you have the right to access your personal data and supplementary information.
- **Right to rectification:** contact us if you notice an inaccurate info and we will correct it straight away.
- **Right to erasure:** You can make a request to erase your account and your data. You can also easily delete your account and all the attached data on the App in the Profile/Settings section.
- **Right to object:** you can ask us to not contact you for marketing purposes at the outset but also at any time after the registration.



For users coming from schools, the teacher will have the possibility to erase the account and the data at the end of the year or whenever he/she wants to.





-  Vos droits
-  Data that we collect
-  Data you must provide us with
-  Data that you can give us but not mandatory

Data erased upon request

User informed in the 72h max following a leak event

Access to data upon request