



# Privacy Policy

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**Class Attendance Tracker (CAT) App is free of charge. You are not obligated to use our App. By using our App, you agree to the terms of this Privacy Policy.**

We are passionate about protecting your privacy and strive to comply with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA).

This policy explains how we use your personal data. We want to help you understand how we work with your data, so that you can make informed choices and be in control of your information. We invite you to spend a few moments understanding this policy. We may update this policy from time to time and, if we make any material changes, we will notify you when we do so. We will provide you with the opportunity to review such changes. By continuing to use our products and services after the changes have been made and we have notified you of them, the way we use your personal data will be subject to the terms of the updated policy.

This policy explains how we use your personal data for our products and services. It also governs the use of your data through our App, or any of our websites (and any reference to our App in this policy shall also include a reference to our websites).

This policy covers:

- Who we are;
- What personal data we hold;
- What we use your personal data for;
- Sharing your personal data;
- Data security and transfers; and
- Your rights.



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## Who we are

This App is published by Shinetech Europe Limited, 8 Devonshire Square, London EC2M 4YF which is registered in England and Wales (Company number 07141834). When this policy talks about “we”, “our” and “us”, it means Shinetech Europe Limited.

We have been registered with the Information Commissioner’s Office (ICO) since November 2011.

## What personal data we hold

We use the following categories of personal data.

### Personal details

When you **Create an Account** on our App, you provide us with just 4 fields of information about yourself:

- 1. Your First Name**
- 2. Your Last Name**
- 3. Your E-mail Address**
- 4. Your Password**

### Deleting your account

If you created an account on our App and wish to delete it, you can delete your account and all your App data permanently any time by Signing into our App, go to the Settings > My Account page and click on “**Delete your account**” and re-enter your Password to confirm your account deletion.

### Technical information and analytics

When you use our App, we may collect technical information where this is permitted by your device settings for our App. We store the decoded QR codes and other related data that you scan or provide us when using our App. If your employer or organisation has asked you to use our App and asks you for other personal information on their websites, then your employer or organisation is responsible for providing you with their instructions and privacy policy.



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## What we use your personal data for

The purposes for which we use your personal data and the legal grounds on which we do so are as follows:

- We obtain and use your personal details in order to establish and deliver our products and services.
- We may use strictly anonymised information to improve our products and services.
- We may obtain and use data about your precise location where you give your consent (through providing us access to your location), for example, to help direct you to the location of an event. We may also derive your approximate location from your IP address.
- We use your email address to contact you with occasional updates and marketing messages where you have not opted out, based on our legitimate interest in marketing our services to you and subject to your right to opt out at any time.
- If your employer or organisation has asked you to use our App and asks you for other personal information on their websites, then your employer or organisation is responsible for providing you with their instructions and privacy policy.
- Based on our legitimate interest in managing and planning our business, we may analyse data about your use of our products and services to, for example, troubleshoot bugs within our App, forecast demand of service and to understand other trends in use, including which features users use the most and find most helpful, and what features users require from us. This does not involve making any decisions about you - it is only about improving our App so that we can deliver better services to you. Strict confidentiality and data security provisions will apply at all times.
- Where necessary, we may need to share personal details for the purposes of fraud prevention and detection.



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## Sharing your personal data with others

- We may share your personal data with companies we have hired to provide services on our behalf, including those who act as data processors on our behalf, acting strictly under contract in accordance with Article 28 GDPR. Those data processors are bound by strict confidentiality and data security provisions, and they can only use your data in the ways specified by us.
- We may share your personal data with our commercial partners, such as your employer, if you have consented to share your personal data with your employer. If your employer or organisation has asked you to use our App and asks you for other personal information on their websites, then your employer or organisation is responsible for providing you with their instructions and privacy policy.
- We may share with our commercial partners aggregated data that does not personally identify you, but which shows general trends, for example, the number of users of our service.
- Where you access our services through any of our commercial partners (including your employer) we may share with such partner your personal data, the fact you have signed in with your profile identifier and your decoded employer class QR codes that you have scanned.
- We may preserve or disclose information about you to comply with a law, regulation, legal process, or governmental request; to assert legal rights or defend against legal claims; or to prevent, detect, or investigate illegal activity, fraud, abuse, violations of our terms, or threats to the security of our services or the physical safety of any person.

Except as described above, we will never share your personal information with any other party without your consent.



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## Data storage, security and transfers

We store all your personal data on secure servers located in the UK. Where you have chosen a password or profile identifier that enables you to access our products, you are responsible for keeping this information confidential.

We ask you not to share your sign in information with anyone.

We encrypt data transmitted to and from our products. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. If your employer or organisation has asked you to use our App and asks you for other personal information on their websites, then your employer or organisation is responsible for providing you with their instructions and privacy policy.

You are solely responsible for the QR codes that you scan. It is your responsibility to ensure that any links in the QR codes that you scan are safe. You are responsible for any third-party Personal Data that you obtain, publish or share through our App.



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## Your rights

You have specific rights under the GDPR and DPA to:

- Wherever we process data based on your consent, withdraw that consent at any time. If you created an account on our App and wish to delete it, you can delete your account and all your App data permanently any time by Signing into our App, go to the Settings > My Account page and click on “**Delete your account**” and re-enter your Password to confirm your account deletion.
- Understand and request a copy of information we hold about you;
- Ask us to rectify or erase information we hold about you; If your employer or organisation has asked you to use our App and asks you for other personal information on their websites, then your employer or organisation is responsible for providing you with their instructions and privacy policy.
- Ask us to restrict our processing of your personal data or object to our processing;
- Ask for your data to be provided on a portable basis.



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## Contact us regarding this privacy policy

If you have any questions about how we process your information, please don't hesitate to get in touch by contacting our Data Protection Officer:

Email: [dpo@catqr.com](mailto:dpo@catqr.com) (do **not** use this email for your support enquiries)

## Support enquiries

If you have been asked to use the CAT App by your employer, university or any other organisation then it is the **sole responsibility of your Organiser to support you**.

Your Organiser can activate your account for you by logging into their **CAT Organiser account**, clicking on the **Attendee** screen > [**Activate Attendee**] button, then entering and submitting your email address.

Check your Junk/Spam email box if you cannot find the CAT system e-mails (e.g. Activation e-mail or Completion History e-mail) in your Inbox. If you are not receiving the CAT system e-mails then you need to contact your email provider or organisation to whitelist or add [no-reply@classattendancetracker.com](mailto:no-reply@classattendancetracker.com) to your safe senders list.

Other than for a limited free trial, your **Organiser is not allowed to use CAT unless your organisation has paid for a CAT Organiser Subscription**. We cannot support tens of thousands of staff and students free of charge, Your Organiser has all the information and tools required to help you.