

Tozi App Privacy Notice Template

Tozi App

In this notice, we explain how we collect, use, share and protect your personal data when you use the “Tozi App”.

The Tozi App (or the “**App**”) is a public mobile app which aims to create a kinder, safer and more loving digital world for young people. Tozi empowers and supports young people in their journey towards creating a positive online (digital) world for themselves and their communities.

The App contains an area called the Cosmos which includes:

- Articles, videos, quizzes, and podcasts with information on how to manage your online life.

The App also includes an area called My Space which includes:

- Feelings tracker where you can track feelings day to day
- Guided Journal where you can reflect and answer daily questions in topics around topics like gratitude, goal setting and interests
- Thoughts area where you can write your own thoughts.

This App is sponsored and supported by the Vodafone Foundation and Vodafone Ireland Foundation. The App also includes a direct link out to the *Childline* service provided by the ISPCC. When using the service, the ISPCC Terms and Privacy policy apply.

Vodafone Foundation and Vodafone Ireland Foundation work together to provide the technology and hosting for the App, while Dublin City University Anti-Bullying Centre provides input so that the App is ready for Ireland, and will also be the main contact point if you or your parent/legal guardian have any questions about the App.

This App is aimed at those aged 12 and over.

About Us

Where this notice refers to ‘Vodafone’, ‘we’, ‘us’ or ‘our’ it refers to the following three organisations:

- Vodafone Foundation
- Vodafone Ireland Foundation

We are ‘joint controllers’ of your personal data. This means that we are jointly decided how and why your personal data should be used, and we are all jointly responsible for protecting it appropriately. If you have any questions about our arrangement, please contact us at **info@to-zi.com**.

Our registered offices are as follows:

- Vodafone Foundation – 1 Kingdom Street, Paddington Central, London, W2 6BY, United Kingdom
- Vodafone Ireland Foundation - 70 St Stephen's Green, Dublin 2, D02 E2X4

Where this notice refers to ‘you’, it refers to any individual who uses the App and – where relevant – their parent/legal guardian. Please note in particular that if a user of the App is aged under 16, then: (i) the rights described in this notice in the ‘What rights do you have?’ section below can be exercised by a user’s parent/legal guardian and (ii) where we ask for consent as part of the App, we will request such consent from the user’s parent or legal guardian (who will also be able to withdraw such consent at any time).

In this privacy notice, the term ‘third party’ refers to any entity that isn’t you or Vodafone.

Information we collect

You do not need to set up an account to download and access the content from within the Cosmos area of our app. The content is available to all users once they download the App. We will only process app diagnostic data at this point, provided that we have your consent to do so. App Diagnostics takes information from your App, allowing it to work better. This helps us to detect, diagnose and fix issues, as well as make product improvements.

If you want to use the My Space section of the App, you will need to set up a user profile and provide some basic information including age and a nickname (username). By setting up a profile, you will be able to make some customizations that will appear each time you access the App and any information you enter will be saved.

You will also be prompted to setup a 6-digit pin to protect the data you enter (e.g. feelings or journal entries). The App will require access to your device storage to allow you to record and make entries in the App.

When you set up a profile, we collect, process, and use some personal data. Personal data is any information that relates to an individual. It does not include information where the identity of the individual has been fully and effectively removed (anonymous data). Below is a data table of all the personal data processed by the App.

Categories of Personal Data	Personal Data	Processing Purpose	Lawful Basis	Storage Location	Retention Period
Authentication data	Pin Hashes	To create login account details	Legitimate Interest	Belgium or Netherlands	1 year last use
	Control questions and other information necessary to verify identity when logging in	To create login account details	Legitimate Interest	Ireland	1 year last use
Basic personal data	Age	To create login account details	Legitimate Interest	Ireland	1 year last use
	Personal email address	To create login account details	Legitimate Interest	Ireland	1 year last use
	Username (e.g. social media username)	To create login account details	Legitimate Interest	Ireland	1 year last use

Data from Device	App diagnostic data (e.g. error codes, usage logs, time stamps etc.)	Application support	Consent	Ireland	1 year last use
	Permission type and permissions from the Device	Application functionality	Legitimate Interest	Ireland	1 year last use
Special categories of personal data	Children's Data	Application functionality	Consent	User Device	-
	- Health, Insurance, Treatment or Medical Information; - Voice recordings including via video recordings - User Generated Content (unstructured data, e.g. notes, documents)	Application functionality	Consent	User Device	-

Under data protection legislation, certain personal data is considered more sensitive (e.g., information relating to race, religion, political affiliation and health). This is also known as special category data . As you can see from the table above, we may collect health data where you choose to provide it (and potentially other types of special category data depending on the information that you provide), including as part of any voice recordings, video recordings and notes that you add to the App.

Lawful Basis

Having a lawful or legal basis for processing personal data means having a valid reason for processing the personal data. There are two legal bases that we rely on to process your personal data:

Legitimate Interests

We may use your personal data where this is necessary for our legitimate interests, provided that those interests are not overridden by your own, or by your fundamental rights and freedoms.

We process the following personal data on the basis of our legitimate interests:

- Pin code information / pin hash
- Control questions and other information necessary to verify identity when logging in

- Age
- Personal email address of parent /guardian
- Username
- Personal e-mail address (when providing parental consent)
- Permission type and permissions from the device you use

We collect this data to provide application support, functionality and to ensure the integrity of your profile.

When we process personal data to meet our legitimate interests, we put in place robust safeguards to ensure that your privacy is protected, data is encrypted and pseudonymised whenever and wherever possible, and to ensure that our legitimate interests are not overridden by your interests or fundamental rights and freedoms.

Explicit consent

We rely on explicit consent to process certain types of data as part of the App, including special category data. In particular we process user mood and journal entry data including voice and text recordings under consent. However, Vodafone does not have access to this data, which is stored on the device.

You will also need to provide consent to the App accessing your device's storage and/or for us to process app diagnostic data, which we use to monitor usage of the App.

In Ireland the "age of digital consent" or the age at which children should be able to consent to the processing of their personal data in an online context without parental involvement is 16. Therefore, Vodafone will seek the consent of a parent/legal guardian for all users under the age of 16. Consent may be withdrawn at any time by contacting the Tozi team at info@to-zi.com.

Please include your Tozi username to facilitate the identification of your account.

What Information We Don't Collect

If you use the My Space features like the journal, thoughts or feelings tracker, the content you enter is stored on your device and is only accessible by you. Vodafone does not have access to this data which can only be viewed through the App.

To keep your entries secure, when you set up your account, you will set up a 6-digit pin for access to this area.

You can delete the entries yourself on your phone at any time.

If you change your phone, Vodafone cannot transfer the data you entered to your new phone. It would be sensible to erase or wipe your old phone so that no data (including data you have provided as part of the App) remains on it.

You should be able to do this in the 'Settings' part of your phone, which should allow you to reset your device. You will be able to delete this data yourself using the deletion function available for each entry in the My Space area of the App by swiping left on the entry you wish to delete and selecting

delete. You can delete all of your data at once through the application settings of your device by selecting “Delete storage” or “Clear my data” (wording may differ depending on your device).

What rights do you have?

You have certain rights regarding your personal data. However, Vodafone cannot access all of your data as described above which may limit our ability to directly satisfy subject rights exercised by you. As noted at the top of this notice, if you are aged under 16, these rights can be exercised by your parent/legal guardian in relation to your personal data.

The right to access – you can access all of your personal data through the App, and you can also ask us to provide you with any data that we hold about you. Please note that we cannot access any of your personal data stored on your device through the My Space area. The only data that we process is the data that we use to confirm your identity. We are unable to access data related to your security in a readable format.

The right to rectification – You can rectify all of your personal data through the App.

The right to restrict processing – You have the right to request that we restrict the processing of your personal data under certain conditions. This means that you can limit the way that we use your data. This is an alternative to requesting the erasure of your data. To restrict processing, Vodafone will disable your account preventing access to the My Space area. You will still be able to access the Cosmos area and its content.

The right to erasure – You have the right to request that we erase your personal data under certain conditions. You can delete your account and therefore delete any personal data via the App settings. Automated deletion of your personal data from our servers takes place after 1 year of last use. However this retention period will not impact any of the data stored through the App on your device. You will be able to delete this data yourself using the deletion function available for each entry in the My Space area of the App by swiping left on the entry you wish to delete and selecting delete. You can delete all of your data at once through the application settings of your device by selecting “Delete storage” or “Clear my data” (wording may differ depending on your device). Please note that in the event of a lost or stolen device, we cannot access and therefore cannot delete data stored on your device, however we can fully disable your account preventing access even with a PIN.

The right to object to processing – You have the right to object to our processing of your personal data under certain conditions.

The right to data portability - You have the right to request that we transfer the data that we have collected to another organisation, or directly to you under certain conditions. However please note that other than the data we use to confirm your identity there is no further data available for us to transfer to you or to another organisation. Please note that we cannot access special categories of personal data recorded by the user on their device and therefore cannot facilitate the portability of this data. We are unable to access data related to your security in a readable format.

The right to withdraw consent - Where we rely on your or your parent or guardian’s consent to process your personal data, you also have the right to withdraw your consent at any time.

To make a request to withdraw consent or otherwise exercise your rights, please contact us at **info@to-zi.com**. Please include your Tozi username to facilitate the identification of your account. If you want to contact us about any of your rights, or to enquire or make a complaint about how we use your information, contact us at **info@tozi.com**. We'll do our best to help but if you're still unhappy, you can contact the Data Protection Commission.

Contact details for the Data Protection Commission are as follows:

Email: info@dataprotection.ie

Phone: +353 (0)57 868 4757 or +353 (0)761 104 800

In writing: Data Protection Office, 21 Fitzwilliam Square, Dublin 2, D02 RD28.

How long we keep your data

Creating a user profile is optional when using the App. If you decide to create a profile, we will store your login details in Tozi's system, and only Vodafone (and our service provider which helps us with the App) will have access to this database. This data will be automatically deleted after 12 months of inactivity on the App. Please note that in the event of a lost or stolen device, Vodafone cannot access and therefore cannot delete data stored on your device, however Vodafone can instead fully disable your account preventing access even with a PIN. Please see section on "What rights do you have?" above for further details on how to disable your account.

How we share your information

We may share information about you with:

- Companies in the Vodafone Group (including with the service provider that helps us with the App);
- Partners or agents involved in delivering the App

Statistical unidentifiable information will be used by Vodafone for research and awareness purposes, and to help up make informed improvements to the App.

International Transfers

We may need to transfer your information to service providers in countries outside of the European Economic Area ("EEA"). We will only transfer your information where we have taken steps to ensure that your personal data is protected in accordance with appropriate safeguards, such as the Standard Contractual Clauses as approved by the European Commission.

How we protect your data

We take technical and organisational security measures as required by law and by industry standards to protect your personal data from unauthorised access, use or disclosure.

We take steps to ensure that we only use your personal data as described in this privacy notice and to honour the permission choices that you have made.

We only partner with service providers who contract to provide the same level of information security.

While we seek to use appropriate organisational, technical, and administrative measures to protect personal data within our organisation, unfortunately no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the “Contact details” section below.

Other websites

The App contains links to Childline provided by the ISPCC chat service and helpline. Please note that when you click on this link, you are entering a website or dialling a phone service for which we have no responsibility (even if you access the website via a link on our App), and which may have a different privacy policy or notice. We encourage you to be aware of other third-party websites and their privacy notices and/or policies.

Changes to this Privacy Notice

We may revise this Privacy Notice from time to time. The most current version of the notice will govern our processing of your information and can be found in “Privacy Notice” on the App. We will also use reasonable efforts to inform you of any significant changes by email where appropriate.

Contact details

If you have any problems or general requests in relation to your personal data or this Privacy Notice, you can contact us directly through our email address **info@to-zi.com**.