

# Privacy and Cookies Policy

Last updated: 13th October 2018 (Version 1.0)

Welcome to Flair (“Stride Insights Ltd”, “we”, “our”, “us”)! Protecting your rights and privacy is our number one concern. We recognise that your personal information is sensitive, so we consider GDPR to be our friend. We’re committed to not only meeting our requirements, but exceeding them.

Our Privacy Policy is designed to help you understand how we process, use and share information that we collect about you, or information that you share with us. This Privacy Policy applies to our Mobile Applications, Websites and Services.

If you’re not happy with this Privacy and Cookies Policy, please contact us any time with your concerns, queries, requests or suggestions at [trust@flairapp.io](mailto:trust@flairapp.io). Please **do not** use our services unless you are satisfied with our Privacy and Cookies Policy.

## Children under the age of 16

Flair’s mobile application is intended for senior secondary school students or older. We understand that a small minority of senior secondary school students may still be under the age of 16. All school-age students require a verification code provided by their school to access our services. In the event that a student who is under the age of 16 attempts to sign-up to our services, they must provide verification of parental consent to the school **before** being provided with a verification code. You can download our parental consent form [here](#).

In the event that we confirm that personal information has been collected by us from someone under the age of 16 without verification of parental consent, we will delete that information promptly. If you are a parent or legal guardian of a child under 16 and believe that we might have any information from or about such child, please contact us at [trust@flairapp.io](mailto:trust@flairapp.io).

## Information we may collect about you

We aim to meet the highest standards in how we manage and protect the personal data you provide to us to deliver our services to you. We are the sole owner of any information we collect. We never sell, share or rent this information unless we have your express permission to do so.

### Information we collect and process about you may include:

- information that you provide to us, for example, by filling forms or creating content on our website or mobile app, or provided to us via email. This includes information you provide at the time of registering for Stride or at any subsequent point;
- if you contact us, we may keep a record of that correspondence;
- information a partner school, college, employer or other organisation provides to us;
- information you volunteer through participation in surveys or polls that we conduct for research purposes;

- device-specific information, such as your hardware model, operating system, unique device identifiers, and mobile network information;
- technical information about your computer, including where available your IP address, operating system and browser type, for system administration and analytical purposes;
- details of your visits to our website or mobile app, including the full Uniform Resource Locators (URL) clickstream to, through and from our website or mobile app (including date and time), length of visits to certain pages and page interaction information (such as scrolls, clicks, etc.)

## **Information we may collect about others**

We may collect and process data about others that you provide us with, including but not limited to, information that you provide by filling forms, creating or sharing content on Flair or provided to us via email. You represent and warrant to us that you have obtained the express consent from the individuals whose data you provide us with.

For the avoidance of any doubt, any reference in this Privacy Policy to your data shall include data about other individuals that you have provided us with.

## **‘Non-personal data’ and cookies**

Like most websites, we gather statistical and other analytical information collected on an aggregate basis of all visitors to our website or mobile app.

A cookie is a small file that is sent by our web server to your computer, which stores information which we can access when you make return visits to our website or mobile app. Storing cookies is usual practice for any website or mobile app that needs to remember what its users’ preferences are and we use cookies to gather data on an anonymous basis on the number of visits to the site /or mobile app. By using the Flair, you consent to the use of these cookies. Most computers are set up to automatically accept cookies. However, you can reset your browser settings to refuse cookies, or to alert you when a cookie is being sent so you can choose whether or not to accept it.

To learn more about how to control cookies from this (and other) websites or apps, you can visit [AboutCookies.org](https://www.aboutcookies.org).

## **What we use information we collect for**

We use information held about you (and information about others that you have shared with us) in the following ways:

- to provide you with a personalised experience in the Flair website / mobile app;
- to provide you with relevant information to do with Flair and related topics and services;
- for marketing, provided that we a) only use aggregated and anonymised data, b) only engage in direct marketing for products and services provided by Flair that we believe to be of relevance to you and c) only where you have provided your express consent;
- to ensure the content of our website and mobile app is presented to you in the most effective manner for you and your device;

- to administer our website and mobile app, and for our own internal operations including research, analysis and statistics;
- to notify you about changes to our service;
- to control unauthorized use or abuse of our services, or otherwise detect, investigate or prevent activities that may violate our policies or be illegal;

## **Choice / opt-out**

Any mailing lists which you may sign up for through this website / app with allow you to opt-out of contact via the unsubscribe button at the bottom of the email.

Likewise, other than communications to you which are necessary for the operation of our website / mobile app in accordance with our terms and conditions, any member of can opt-out at any time.

## **Updating, verifying and deleting information**

We provide mechanisms throughout the website / mobile app to enable individuals to update their own information.

You may inform us of any changes in your personal data, and in accordance with our obligations under the Data Protection Acts 1988 and 2003 we will update or delete your personal data accordingly.

To find out what personal data we hold on you or to have your personal data updated, amended or removed from our database, or if you have questions about your personal data or our Privacy & Cookie Policy, please email us at [trust@flairapp.io](mailto:trust@flairapp.io) . Any such data subject requests may be subject to the prescribed fee.

## **Retention and disclosure of your information**

We will retain information for as long as it is necessary to provide you with the Flair service, deal with any specific issues that you may raise, or otherwise as is required by law or any relevant regulatory body.

Under normal circumstance, Flair will not make any disclosure of data you provide to any 3<sup>rd</sup> party. However, we will do so:

- where it is required to provide the services you have contracted with us to provide;
- where required for us to comply with a legal obligation;
- where failure to disclose data could cause loss, injury or death to the Data Subject or another;
- where you provide consent to the disclosure

We reserve the right to transfer information (including your personal data) to a third party in the event of a transfer of all or substantially all of the assets of Flair relating to our services provided that the third party agrees to adhere to the terms of the Privacy & Cookie Policy and provided that the third party only uses your personal data for the purposes that you provided it to us. You will be notified in the event of any such transfer and you will be afforded an opportunity to opt-out.

## Security

Your personal data is held on secure servers hosted by our Internet Service Provider. The nature of the Internet is such that we cannot guarantee or warrant the security of any information you transmit to us via the Internet. No data transmission over the Internet can be guaranteed to be 100% secure. However, we will take all reasonable steps (including appropriate technical and organisational measures) to protect your personal data.

All communication between your computer and our server takes place over an SSL secured internet connection, generally regarded as offering the highest level of commercially available internet security.

Any external links to other websites are clearly identifiable as such, and we are not responsible for the content or the privacy policies of these other websites.

## Updates and reviews

We conduct regular updates of our Privacy and Cookies Policy as part of our commitment to best practice in information governance. Our reviews are conducted:

- Annually;
- As part of the introduction of new products, services or features through the site / app;
- In response to customer feedback;
- In response to feedback or requests from the Data Protection Commissioner;
- In response to changes to legislation.

## Notification of changes

We will communicate changes to our Privacy and Cookies Policy to Flair users via email and / or via footer note in our website or mobile app. Continued use of our services after changes to our policy constitute acceptance of the revised policy.

## Contact

Questions, comments, requests and suggestions in relation to our Privacy and Cookies Policy or your personal data are welcome. Please contact us at [trust@flairapp.io](mailto:trust@flairapp.io).

*Stride Insights Ltd is a limited company registered in Ireland, with company number 578938. Our registered office is at 81 Salthill, Seapoint Avenue, Monkstown, Co. Dublin.*