# Youhere.org - Alignment with GDPR and CIPA

This document contains statements as to how Youhere.org aligns with:

- 1. the European Union's (EU's) General Data Protection Regulation (GDPR) and
- 2. Child Internet Protection Action (CIPA) statements

# **GDPR**

# Part I

The European Union (EU) has a rather strict General Data Protection Regulation (or GDPR). In Parts I and II below, we discuss how Youhere embraces their core values (see <u>Article 5.1-2</u> of the EU's GDPR):

GDPR Value	Youhere.org
Lawfulness, fairness and transparency — Processing must be lawful, fair, and transparent to the data subject.	Your name is used to build an attendance roster. Your location is used to verify that you're with the geofence your group leader needs, then discarded.
Purpose limitation — You must process data for the legitimate purposes specified explicitly to the data subject when you collected it.	(See above.)
Data minimization — You should collect and process only as much data as absolutely necessary for the purposes specified.	Nothing more than your name is collected. And your location is queried only when you tap the "Check me in" button. No other data is ever collected.
Accuracy — You must keep personal data accurate and up to date.	We don't keep any personal data.
Storage limitation — You may only store personally identifying data for as long as necessary for the specified purpose.	We store attendance rosters as long as your group leader wants. When they choose to delete it, it will be gone.
Integrity and confidentiality — Processing must be done in such a way as to ensure appropriate security, integrity, and confidentiality (e.g. by using encryption).	All communication between the check-in app and our server is encrypted with https.
Accountability — The data controller is responsible for being able to demonstrate GDPR compliance with all of these principles.	We are happy to reasonably demonstrate our commitment to GDPR standards at any time.

## Part II

The following questions and issues concerning data privacy<sup>1</sup>, as dictated by the GDPR are assessed by Youhere as shown.

Note: as you read through the points below, keep in mind that Youhere collects a very minimal amount of data:

- 1. Email addresses from administrators, as they make an account at Youhere.org, and
- 2. First and last names of the participants who will be checking-in using our app.

This is all the data Youhere collects. In use, participants have no reason to make an account at Youhere.org and administrators will not find any administrative tools in the app.

#### 1. What data do we collect?

- The website collects an email address of the administrator of the group.
- The App collects the first and last name of a participant (student, group member, etc.). These names however, remain on the phone until a participant enrolls in an event.
- No other data is collected of any party

## 2. How do we collect your data?

- The administrator email is collected when an account is made at Youhere.org.
- The first and last name is collected when a participant enrolls in a check-in event being run by the administrator.

#### 3. How will we use your data?

- The administrator email address is used to allow them to log-in to their account at Youhere.org to administer their check-ins (set a location, view reports, etc.)
- The first and last name of a participant is used to compile an attendance roster for the administrator.
- We do not use this data in any other way.
- We do not share this data with any other party.

#### 4. How do we store your data?

- Our Company securely stores your data in a server within the Google Cloud Platform. The physical location of the server is in the mid-western part of the United States.
- Our company keeps the data until it is removed by the administrator, or a party requests for it to be removed.

### 5. Marketing

We do not send out information about products or services. We do not collaborate with any
partner companies insofar as this data is concerned.

#### 6. What are your data protection rights?

Youhere would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

- The right to access You have the right to request copies of your personal data. We may charge a small fee for this service.
- The right to rectification You have the right to request that Youhere correct information you believe is inaccurate. You also have the right to request that Youhere complete information you believe is incomplete. Youhere adaptation: participants should first contact their group lead about changing any of their information.
- The right to erasure You have the right to request that Youehere erase your personal data, under certain conditions. Youhere adaptation: participants should first contact their group lead about erasing their information.
- The right to restrict processing You have the right to request that Youhere restrict processing of your personal data, under certain conditions.
- The right to object to processing You have the right to object to Youhere processing your personal data, under certain conditions.
- The right to data portability You have the right to request that Youhere transfer the data that
  we have collected to another organization, or directly to you, under certain conditions. Youhere
  adaptation: participants should first contact their group lead about obtaining any of their
  information, and should also note the app can also be used to view their check-in record on
  demand.

If you make a request, we have one month to respond to you. If you would like to exercise these rights, please contact us at the email address found in the 'contact' section of our website at youhere.org.

# What are cookies?

Cookies are small text files placed on your computer to collect standard Internet log information and visitor behavior information. When you visit our website, we may collect information from you automatically through cookies or similar technology. For further information, visit <u>allaboutcookies.org</u>.

#### How do we use cookies?

Youhere uses cookies for just one purpose: to keep an administrator signed into the website.

#### What type of cookies do we use?

Functionality - Youhere using a single cooking to recognize administrators logged onto the website and to remember their previously selected preferences.

#### How to manage cookies

You can set your browser to accept cookies. However, if you do so, you will not be able to make an account and log on to our website.

### Privacy policies of other websites

The Youhere.org website contains some links to other websites. Our privacy policy only applies to our website. If you click on a website link, please read their privacy policy.

### Changes to our privacy policy

Youhere keeps its privacy policy under regular review and places any updates on this website.

#### How to contact us

If you have any questions about our privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us at the email address found in the 'contact' section of our website.

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<sup>1</sup>https://gdpr.eu/wp-content/uploads/2019/01/Our-Company-Privacy-Policy.pdf

# **CIPA**

CIPA (Child Internet Protection Action) is another safety metric we have studied. The points it focuses on are in the left column. How Youhere deals with a point is in the right column.

CIPA Point	Youhere.org
Access by minors to inappropriate matters on the Internet.	The App does not contain, point to, or include any inappropriate content. It does not display any graphics, text or advertisements. It only displays buttons on the user interface, and short text-based information about check-in results and data-privacy.
The safety and security of minors when using electronic mail, chat rooms and other forms of direct electronic communications;	Not part of Youhere.org. Minors or otherwise "participants" are not contacted by Youhere.
Unauthorized access, including so-called "hacking," and other unlawful activities by minors online	Security is a constant concern and has ongoing and proprietary efforts underway.
Unauthorized disclosure, use, and dissemination of personal information regarding minors.	We do not collect any personal information from our users.
Measures restricting minors' access to materials harmful to them.	Youhere is appropriate for all audiences.

We stand by all of the information in this document and in our <u>online privacy policy</u>. At Youhere, we have over 2 million problem-free check-ins and counting. Contact us with any concerns or clarifications. We would be happy to speak with you via Zoom or otherwise if needed. Your school or department may have a privacy/data storage agreement or document, which we'd be happy to fill out and conform with.