

PRIVACY POLICY

Date of Last Revision: 26 May 2020

KEY POINTS

- We fully comply with the General Data Protection Regulation (“GDPR”) and the UK Digital Standards.
- We do not share or sell personal data to third parties, under any circumstances.
- We promote your rights to access and control your personal data.
- We do not access any personal data without your explicit consent.
- We do not store or transfer any personal data outside of the Europe Economic Area
- To populate your profile and as part of the basic service, we share with other users within your school network: your name, your profile picture, the school years of any children you add to your profile, your children’s school year only.
- You can optionally choose to share with other users of your school network: the approximate distance you live from other parents. This will only be shared with your explicit consent and can be hidden at any time thereafter by amending your settings from within the App.

SUMMARY

Below is a brief overview of what this policy explains. Please be sure to read the entire policy carefully before using the Apps or the Sites.

- **Section 1: What we collect** - Explains what personal information we collect from you. This includes your name and contact details, your location, and how you use our apps and sites.
- **Section 2 and 3: How we use your information** - Explains how we use your information, which includes sharing your (anonymous, aggregated) transport data on an aggregated and anonymous information with the school and relevant council.
- **Section 4: Transfer of personal data** - We shall not store or transfer any personal data outside of the European Economic Area.
- **Section 5: Your rights (Data Portability, Access & Erasure)** - You have a right to find out what personal data we hold about you and to check that your personal data is accurate and up to date, and the right to request erasure of personal data.
- **Section 6: External Websites** - We do not accept responsibility for personal data collected by external websites.
- **Section 7: Cookies** - Our sites use “cookies” to make them easier to use.

INTRODUCTION

Our apps, including HomeRun (“Apps”) and our websites, including www.homerun-app.com (“Sites”) are brought to you by Sustainable Commute Solutions Limited (“we”, “us”, “our”). Our registered office is at 9 Grange Gardens, Hampstead, London, UK NW3 7XG. We are a company registered in England, with company number 10203718. This privacy policy (“Policy”) sets out how we use and protect the information that you give us when using our Apps. We are committed to ensuring that your privacy is protected, any information we ask you to provide will only be used in accordance with this Policy.

CONSENT

By accessing the Apps or the Sites you authorise us to collect, store, access, transfer and use your information as described in this Policy. We may make changes to this Policy in the future, which we will notify you of in the website (www.homerun-app.com). You should check this page from time to time to ensure you are aware of any changes. Where appropriate we may notify you of changes by email or through the Apps or Sites. This policy is effective from 3 May 2018 and is in accordance with the GDPR which came into effect on 25 May 2018.

CHILDREN

CHILDREN UNDER THE AGE OF 18 MAY ONLY USE THE SITES OR APPS UNDER THE SUPERVISION OF, OR WITH THE EXPRESS CONSENT OF, THEIR PARENT OR GUARDIAN.

WE DO NOT KNOWINGLY COLLECT INFORMATION FROM CHILDREN WITHOUT THE EXPLICIT CONSENT OF THEIR PARENT OR GUARDIAN. IF YOU SUSPECT WE MAY HAVE INADVERTENTLY COLLECTED ANY SUCH INFORMATION WITHOUT CONSENT, PLEASE LET US KNOW STRAIGHT AWAY BY WRITING TO US AT info@homerun-app.com.

THE DATA CONTROLLER

For the purposes of the GDPR, we act as the 'data controller' (i.e. the company who is responsible for, and controls the processing of, your personal data). This personal data is collected by us and stored on a secure basis, when you input your data upon registering for the Apps. You will be required to explicitly consent to our End User Licence Agreement (EULA) and Policy before populating your personal data into the Apps.

Examples of personal data where we are the data controller is the data you supply via the App and site which is: car registration details, home address, email address, telephone number, children's names and your children's school year. Where you allow your location to be shared, we shall also obtain that data on an aggregated basis and it will be stored anonymously. Further details are set out below in the section "PERSONAL DATA WE MAY COLLECT ABOUT YOU".

1. PERSONAL DATA WE MAY COLLECT ABOUT YOU

1.1. Data you supply ("Submitted Information") includes:

- 1.1.1. We will obtain personal data about you (such as name, address, telephone number, email address, children's school years, school name, details about your vehicle (optional)) whenever you register an account with us or submit material through a form, or via a service, in our Apps or on our Sites.
- 1.1.2. We may also obtain sensitive personal data about you if you voluntarily supply it through our Apps or Sites. If you volunteer such information, you will be consenting to our processing it for the purpose explained to you when you supply it.

1.2. Data we collect includes:

- 1.2.1. We may monitor your use of our Apps and Sites through the use of cookies and similar tracking technologies. For example, we may monitor how many times you visit, your IP address, a unique device identifier and the actions you take when using our Apps ("Analytics").
- 1.2.2. Our Apps or Sites may also collect information which you make available to us and which is stored on your device, including images, or other digital content ("Content Information").

- 1.2.3. When you install, uninstall or update our Apps, a unique application number and information about your installation, for example, the type of operating system, may be sent to us.
- 1.2.4. The Apps keep track of the actual physical location of our users including you, your children by collecting GPS and Wi-Fi network information from your devices (“Location Information”) only during those periods when the relevant user has activated the tracking function of the Apps. Location Information may also include data about the mode of transport you are using. For avoidance of doubt, even after activating the tracking function, you can choose to opt out and deactivate the tracking function and we will no longer have access to your Location Information.

2. HOW WE USE YOUR PERSONAL DATA

- 2.1. We will use your personal data for the purposes described to you at the time your data was obtained, and for the following purposes, subject to the privacy and sharing settings you configure through the Apps:
 - 2.1.1. Submitted Information: to help us identify you and to open, run and monitor any accounts you hold with us; administration; to process your orders and enquiries; to monitor any material you contribute through our Sites or Apps; to send you information about our Apps and Sites; to set up your profile on the Apps and make that profile available to other users; to enable you to send messages to other users of the Apps.
 - 2.1.2. Analytics: to understand how, and how often, users make use of our Apps and use our Sites, and to help us improve them.
 - 2.1.3. Content Information: to set up your profile on the Apps and make that profile available to other users and to enable you to send messages to other users of the Apps. The following information can be shared:
 - (a) Required: Profile information is shared with users of your school network once signed up to the service and is limited to your name, profile picture and the school years of your children. You are given the option by default to use anonymous cartoon avatars as your profile picture.
 - (b) Optional: Optional journey sharing features show the approximate distances parents from the same school live from each other. Users addresses are never shared. Users are required to explicitly opt into journey sharing features before this information is shared, and can opt out at any time by changing their settings within the App.
 - 2.1.4. Location Information: to monitor and share your location when requested by you, as part of our service to encourage independent travel. We also use anonymous, aggregated Location Information collected from all users, to help local authorities, schools and parents to make more efficient use of roads and infrastructure.
 - 2.1.5. We do not, as a clear and overarching rule, pass on your personal information, unless you specifically consent to us doing so or we are specifically required by law.
- 2.2. We may associate any category of information with any other category of information and will treat the combined information as personal data in accordance with this policy for as long as it is combined. We will only use information collected about you in accordance with the GDPR and in accordance with our capacity as the data controller.

3. DISCLOSURE OF YOUR INFORMATION

- 3.1. We may disclose some or all of the data we collect from you when you download or use the Apps or our Sites.
- 3.2. All of the aggregated journey information supplied by you and otherwise collected by our apps will be accessible to your child's school in an aggregated and anonymised format.
- 3.3. Otherwise, we only disclose your personal data in the following ways:

Category of data	Recipient and Purpose
Submitted Information and Content Information	We may share your name and email address with the email service providers we use to keep you updated with news about our Apps and Sites. We also share your name, and child's school year with other users of the Apps.
Content Information, Analytics and Submitted Information	Our Apps and Sites collect information about the way you use them, such as your IP, a unique device identifier and the actions you take when using our Apps and Sites. We only use this data to improve our Apps and Sites.
Location Information	Location Information is shared in the following ways, depending upon connections made between users in the Apps: <ul style="list-style-type: none">• a parent or guardian may link their App account to their child's device, and may then collect Location Information from their child's device (Only when the child activates the tracking function);• we may share details of the journeys tracked using our Apps in anonymous and aggregated format with third parties, but any such Location Information will not include your personal information.

- 3.4. We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the Companies Act 2006.
- 3.5. We may also disclose your personal information to third parties:
- 3.5.1. In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- 3.5.2. If we or substantially all of our assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets.

- 3.5.3. If we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request.
- 3.5.4. In order to enforce or apply the terms of agreements between us, to investigate potential breaches, or to protect the rights, property or safety of us, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

4. WHERE WE STORE YOUR PERSONAL DATA

- 4.1. The data we collect from you will not be transferred to, or stored at, a destination outside the European Economic Area (“EEA”). It will only be processed by our staff operating within the EEA who work for us or our suppliers and strictly as necessary to provide the service to you. Your personal data which you provide via the Apps or Sites is not sold or transferred to any third party by us and is used solely within the service itself.
- 4.2. Where we have given you (or where you have chosen) a password that enables you to access certain parts of our Apps or Sites, you are responsible for keeping this password confidential. We kindly ask you not to share a password with anyone.
- 4.3. Unfortunately, the transmission of information via the internet is not completely secure. We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place physical and electronic procedures to safeguard and secure your information. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Apps or Sites; any transmission is at your own risk. Certain features of our Apps and Sites enable social networking, messaging, publishing, chat room or forum features. Ensure when using these features that you do not submit any personal data that you do not want to be publicly seen, collected or used by other users.

5. YOUR RIGHTS

- 5.1. If you believe we have information about you that you do not want us to have or that is incorrect please contact us as at info@homerun-app.com and we shall correct or remove the data, as you request, as soon as reasonably practicable. If you would like to receive a copy of the information we have about you, in line with your rights to data access, we will endeavor to provide you with information promptly upon receipt of your request. In the event, you choose, to deactivate your registration with our Apps, you have the right to request erasure, whereby we will remove your personal information from our database within 14 days.

6. EXTERNAL WEBSITES

- 6.1. If you follow a link from our Apps or Sites to any third party websites or services, please note that we do not accept any responsibility or liability for the collection, storage or use of personal data by those third parties, and you should check the applicable privacy policies before you submit any personal data to those websites or use these services.

7. COOKIES

- 7.1. A cookie is a text file placed onto your device when you access our Apps or Sites. We use cookies and other online tracking devices such as web beacons, and flash object storage to deliver, improve and monitor our Sites and Apps, including in the following ways:

Authentication	To log you into our Sites and Apps and keep you logged in.
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Preferences	To remember information about you such as your preferred language and configuration.
Analytics	To help us understand how you use our Apps and Sites, and how often, so we can improve them to deliver a better experience for our users. To carry out research and statistical analysis to help improve our content, products and services.

- 7.2. The information we obtain from our use of cookies will not usually contain your personal data. Although we may obtain information about your device such as your IP address, your browser and/or other internet log information, this will not usually identify you personally.
- 7.3. Our Sites display a notice alerting you to our use of cookies and other similar technologies and linking to this Policy. If you use our Sites after this notice has been displayed to you we will assume that you consent to our use of cookies or similar technologies for the purposes described in this Policy.
- 7.4. Please note that, if you choose to disable cookies or similar technologies on your device, you may be unable to make full use of our Apps and Sites.
- 7.5. We work with third parties who may also set cookies on our website, for example Google Analytics, Google AdSense, Facebook, Twitter and YouTube which we use to display video content, enable social networking functionality and sharing, to deliver ads, send notifications and to monitor how visitors use our Apps and Sites. These third-party suppliers are responsible for the cookies they set on your device. For further information, please visit the website of the relevant third party.

For any questions about the policy do not hesitate to contact us at info@homerun-app.com