

## Verto Privacy Policy

Effective Date: December 21<sup>st</sup>, 2017

We have done our best to keep the legal and technical jargon to a minimum.

In the following text we will refer to Bite The Ballot Digital Ltd as (“BTBD”)

We handle information in connection to your use of Verto (the “App”),

We will refer to the Verto App (the “App”) you may access on your mobile telephone, tablet, desktop or other compatible device, we will refer to the (“Device”).

### **Important note**

Currently, anyone who plays Verto and answers a question is classed as a non-registered user as we do not offer the option for you to create an account.

The information we collect is collected in a way that no one (not even us) would be able to link the data to you.

If you liked one of our stories or wanted to stay in touch, there is the option to elect to receive notifications when fresh content is available to view, but again we are unable to identify you through these notifications.

We will aggregate your data so that it can be shared with third parties and they won’t know who you are either.

The technical term for this is “pseudonymisation” – nothing goes into our database that could link your answers to you.

### **1. What information does BTBD collect?**

If you choose to provide it as part of using the App and answering questions within the App, we will collect information relating to you, your device and your thoughts, opinions and attitudes to different societal and commercial issues.

Please note that this data is collected and stored in a way that prevents it from being linked to you.

We will collect information i.e. your answers that you willingly submit it to us as part of using the App.

### **Information we collect about you indirectly or passively when you interact with us**

- **Types of device data:**
  - the type of device you use;
  - the web browser you use;
  - the screen resolution of your device; and
  - the operating system of your device.
  
- **Usage data:**

We collect usage data whenever you interact with the App. This may include what features you use, what you click on, what happened when you performed those actions, and so on.

- **Referral data:**

If you arrive at to the App from an external source (such as a link on another website or in an email), we record information about the source that referred you to us.

- **Anonymised IP address:**

Our servers read the incoming IP addresses of users that use the App. We immediately derive your country from your IP address using the free Geocoding IP database provided by MaxMind. We store your country code against your anonymous viewer ID in our database. This enables us to filter Verto data by country. We then send an anonymised version of your IP to our analytics service, allowing us to generate anonymised analytics reports filterable by location. At this point, our server forgets your IP address. It is not stored in log files.

## 2. Security, cookies and other important information

- **Database hosting.** Our database is hosted by Amazon Web Services in the United Kingdom, so your personal data will be primarily processed by us in the United Kingdom.
- **Device Analytics.** We use device analytics software to allow us to better understand the functionality of the App on your device. This software may record information such as how often you use the App, the events that occur within the application, aggregated usage, performance data, and where the application was accessed or downloaded from.
- **Cookies.** We use cookies on the App. Cookies are small bits of data we store on the device you use to access our services so we can recognize repeat users. We use two cookies:
  1. **To provide a user session.** When you first access the app, we create a cookie called “verto-token-prod”. This cookie is used to tie all of your answers together in the database, and to ensure you don’t lose your progress when you refresh the page. It does not let us identify you. If you choose to sign-in to Verto, this cookie is associated with your identity in Auth0. We will seek your explicit permission before this happens.
  2. **To improve our services.** The second cookie is called “verto-analytics-prod”. We use this cookie to measure your usage of the App and track referral data. This cookie is used by our analytics service that helps us to develop and improve our services and optimize the content we display to users.
- **Third-party cookies.** We don’t allow any third parties to set cookies. This means your time spent on Verto is not captured by any tracking services. It is impossible for anyone to look at your use of Verto and cross-reference it with how you use other services.

## 3. How does BTBD use the information we collect?

Generally, we use the information we collect from you to create insight for the purpose of supporting the advocacy conducted by the charity, Bite The Ballot Education and for commercial third parties, as well as to enhance the App’s offerings.

So, in full we use the information you provide:

- **to monitor and maintain our services.** We analyze information we collect to troubleshoot, test, and improve our services and in these instances, we may use your information for internal purposes designed to keep our services secure and operational.
- **to improve our services and features.** We internally perform statistical and other analysis on information we collect (including usage data, device data and information from cookies) to analyze and measure user behavior and trends, to understand how people use the App, for marketing, for research and development purposes, and to help us evaluate or devise new features.

**Data controller.** BTBD, whose contact information is listed in the contact page, is the data controller for registration, other account information, and personal information that we collect from users in the EU.