

## TIMES HIGHER EDUCATION US COLLEGE STUDENT SURVEY PRIVACY POLICY

This is the Privacy Policy for the Times Higher Education US College Student Survey (from hereon referred to as the “Survey”) managed by Streetbees, <https://the-us-2019.student-survey.streetbees.com> or <https://us-2019.student-survey.streetbees.com> (the “site”) and any web or mobile application we provide (the “application”). The site and application are operated by or on behalf of Streetbees.com Limited (“we”, “us” and “our”). Our registered company number is 09177215, and our registered office is located at 2nd Floor 100 Cannon Street, London EC4N 6EU, United Kingdom. Our VAT registration number is GB197- 413-384. We are committed to protecting and respecting your privacy online. We appreciate that you do not want your personal data distributed indiscriminately and this Privacy Policy (together with our Streetbees.com Limited “US College Rankings 2019” Student Contest Terms and Conditions and any other documents referred to on it) sets out the basis on which any personal data that we collect from you, or that you provide to us, will be collected and processed by us and what controls you have. Please read the following Privacy Policy carefully to understand our views and practices regarding your personal data and how we will collect, process, protect and treat it.

For the purpose of the Data Protection Act 1998 (the Act) and the EU General Data Protection Regulation 2016/679 of 27 April 2016 (the GDPR), the data controller is Streetbees.com Limited, a company registered in England and Wales under company number 09177215 and having its registered office located at 2nd Floor, 100 Cannon Street, London EC4N 6EU, United Kingdom.

By using the site and/or application, you consent to the collection and use of your personal data in accordance with this Privacy Policy.

You are under no obligation to provide any such personal data. However, should you choose to withhold the requested personal data, we may not be able to provide you with certain services.

We reserve the right to change this Privacy Policy from time to time by changing it on the site or by updating it on the application.

This Privacy Policy was last updated on 25/02/2019.

### 1. PERSONAL DATA WE MAY COLLECT FROM YOU

- For the purpose of this Privacy Policy, “**personal data**” shall have the meaning defined by Article 1 of the Act and Article 4 of the GDPR. Here is the information we will request from you to participate in the Survey: email address; nationality; year of birth ; gender; and PayPal email

address. We may retain information required in order to enforce our contractual rights or obligations, meet our legal or regulatory obligations or resolve a dispute.

- When you take part in our Survey, we shall collect your responses and remove as much personal data as reasonably possible before creating a report. As regards location data, only your country information will be used. We may then provide these reports to our third-party clients (the “**clients**”) for a fee or use the data for our own analysis. Please note that our clients will not be provided with any personally identifiable information.
  - When participating in the Survey, you may be requested to submit an open text answer, i.e. type an ad hoc answer text. In such case, you warrant that this open text does not include any personal data about yourself or any other individual, unless expressly requested by us and, in case it includes personal data about another individual, you shall warrant that said individual has consented to our terms and conditions. Please note that, unless we expressly requested personal data to be included in an open text submission, we shall irrevocably treat all open text submissions as not including personal data.
  - When you participate in the Survey, we collect information through the site or application as to your real time location so that anonymised responses sent to clients can be based on knowing country. This information is/may also be collected in combination with an identifier associated with your device to enable us to recognise your mobile browser or device when you return to the site or application.
  - For your information, processing of personal data is based on contract performance under Schedule 2 of the Act and Article 6 of the GDPR.
  - Other personal data may be requested in relation to any competition or promotion we may sponsor, in which case a specific policy will be provided.
  - We may, from time to time, run referral programmes or similar initiatives, such as a “Refer a Friend” programme, that invite you to provide us with the contact details of someone who is known to you and who may find our products or services to be of interest. We will only use those contact details for the purpose of the relevant initiative (and not for general marketing purposes). By providing us with their details, you confirm that you have these persons’ permission to do so and must not provide us with the details of anyone from whom you do not have such permission. We reserve the right to identify you as the person who has made the referral in the message that is sent to them.
- 
- We may also ask you for first name, surname, email and phone number when you report a problem with the site, the application or our service (processing based on our legitimate interest or on contract performance under Schedule 2 of the Act and Article 6 of the GDPR).
  - If you contact us, we may keep a record of that correspondence as well as your first name, last name, email address and phone number (if provided) (processing based on our legitimate interest under Schedule 2 of the Act and Article 6 of the GDPR).

- We may, by means of cookies (see section 10 below) and/or other similar technologies, keep details of the data related to your visits to the site or application, including the type and version of internet browser you use, the type, manufacturer and model of the computer or mobile device you use, any website or external application from which you have come to the site or application, your IP address, the operating system of your computer or mobile device, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.
- Finally, we may monitor your use of the site or application using cookies and/or similar tracking devices. For more information, please refer to section 10 below.

## 2. THIRD-PARTY WEBSITES

- The site or application may also, from time to time, contain links to external websites. We are not responsible for the privacy policies, terms and conditions, other policies or content of such external websites.

## 3. WHERE AND HOW WE STORE YOUR PERSONAL DATA

- We make our best efforts to ensure your personal data is kept secure and protected from accidental loss or unauthorized access, use or alteration, through the following structural and technical measures: Confidentiality clauses in all of our employment and service agreements with natural or legal persons having access to personal data; Computers and email accounts of all of our employees being password protected; Encryption of the personal data while in transport through the https protocol; Encryption of the personal data while at rest; Encryption of the backups including personal data; Personal data stored on secured servers and infrastructures; Permissions of access to documents including personal data regularly reviewed and monitored; and Regular monitoring of the usefulness of stored personal data and deletion of all personal data no longer required for the purpose for which it was collected.
- Unfortunately, and despite our efforts, the transmission of information via the internet is not completely secure. Although we will take reasonable precautions to protect your personal data, we cannot guarantee the security of your data transmitted to the site or application; please note that any such transmission is at your own risk. Once we have received your personal data, we will use our procedures and security features to try to prevent any unauthorised access.
- The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing and processing. We will take reasonable precautions to ensure that your personal data is treated securely and in accordance with this Privacy Policy by us, our licensors and contractors.

- All personal data you provide to us is stored on our (or our licensors and contractors') secure servers.
- It is advisable to close your browser when you have finished your user session to help ensure others do not access your personal data if you use a shared computer or a computer in a public place.

#### 4. USES MADE OF THE PERSONAL DATA

- Please find below a description of the purposes for which we use the personal data you may provide us while using the site or application.
- The personal data provided may be used for the following purposes (and contact will be made through the email address provided): Authentication and verification of student email address; Payment processing (including but not limited to verifying and carrying out financial transactions); Reminder to complete the Survey; Requesting referrals for the Survey
- The personal data provided while contacting us at the email address provided on the site or application may be used for the following purposes: Address the person's request; Tracking issues with the site or application; Tracking late payments; and Archiving and statistics about our received correspondence.
- We may also use the personal held about you for the following purposes: Help us identify you and any account you may have with us; Marketing communication (from us or one of our business partners) if you expressly accepted to be contacted for marketing purposes; Administration Research, statistical and behavioural analysis; Fraud prevention and detection; Security vetting; Ensure that content from the site and application is presented in the most effective manner for you and for your computer and/or mobile device; Allow you to participate in interactive features of our service, when you choose to do so; Identify visitors to the site or application; Notify you about changes to our service; Address a problem you may face with the site, the application or our service.

#### 5. DISCLOSURE OF YOUR PERSONAL DATA

- We may disclose your personal data to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006. We may disclose your personal data to third parties:
  - 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. If Streetbees.com Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets. If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions or the terms and conditions of a service

delivered by us through the service platform on the site or application and other agreements; or to protect the rights, property, or safety of Streetbees.com Limited, our licensors and customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection.

- We may also disclose your personal data to:
  - Our agents and service providers; The third-party websites as defined in section 2 above; Our business partners if you agreed to be contacted by them for marketing purposes (see section 4 above).

## 6. MONITORING

We may monitor and/or record our communications with you, on whatever channel, for quality, training, fraud detection and compliance purposes.

## 7. YOUR RIGHTS

- You have a certain number of rights in relation to our processing of your personal data which are being summarized in this section.
- Right to be informed : You have the right to be informed about the collection and use of your personal data, which is the purpose of this Privacy Policy.
- Right of access : You have the right to request access to the personal data we may hold about you. In order to exercise this right for the personal data not available directly, you should: put this request in writing; attach a proof of identity and address; specify the personal data to which you want to have access.
- Right to rectification : You have the right to have the personal data we hold about you rectified if it is inaccurate or incomplete. In order to exercise this right for the personal data not modifiable directly, you should: put this request in writing; attach a proof of identity and address; specify the personal data you want us to rectify.
- Right to erasure or right to be forgotten : In some instances, you have the right to request the deletion or removal of your personal data where there is no compelling reason for its continued processing.
  - This right is not absolute and only applies if:
    - the personal data is no longer necessary for the purpose for which it was originally collected or processed; the personal data was collected and processed relying on your consent and you decide to withdraw such consent; the processing is based on legitimate interests and there is no overriding legitimate interest to continue this processing; the personal data is being processed for direct marketing purposes and you object to that processing; the personal data is being processed unlawfully; we have to do it to comply with a legal obligation; or the personal data was processed

to offer information society services to a child.

- Provided it is applicable, you should do the following in order to exercise this right:
  - put the request in writing; attach a proof of identity and address; specify the personal data you want us to erase.
- Right to restrict processing : You have the right to block or suppress the processing of your personal data for the future, in certain conditions described in Article 18 of the GDPR. In order to exercise this right, you should:
  - put this request in writing; attach a proof of identity and address; specify the personal data or processing you want to restrict.
- Right to data portability : You have the right to obtain and reuse the personal data we process about you, for your own purposes across different services. In order to exercise this right, you should: put this request in writing; attach a proof of identity and address; specify the personal data you want to obtain for porting.
- Right to object : You have the right to object to:
  - processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling); direct marketing (including profiling); and processing for purposes of scientific/historical research and statistics.
- In order to exercise this right, you should:
  - put this request in writing; attach a proof of identity and address; specify the processing to which you want to object.

## 8. CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our Privacy Policy in the future will be posted on this page.

You should check our Privacy Policy on a regular basis to ensure you are aware of its most recent version, as it is the latest available version of this Privacy Policy that shall apply each time you access to the site or application.

## 9. CONTACT

Questions, comments and requests regarding this Privacy Policy are welcome and should be addressed by email to [queenbee@streetbees.com](mailto:queenbee@streetbees.com) or by post to our registered address mentioned

above.

## 10. STREETBEES USE OF COOKIES

- When you interact with the site or application, we try to make that experience simple and meaningful. When you visit the site or access to the application, a web server sends a cookie or other similar technology to your computer or mobile device (as the case may be). Cookies are small pieces of information which are issued to your computer or mobile device (as the case may be) when you visit a website or access to a mobile application and which store and sometimes track information. A number of cookies we use last only for the duration of your web or application session and expire when you close your browser or exit the application. Other cookies are used to remember you when you return to the site or application and will last for longer.
- We use cookies and/or other similar technologies (including Pixel codes) for the following purposes: **Strictly necessary cookies** enabling you to navigate round the site or application, **Performance** collecting anonymous statistical information about how you use the site or application (including how long you spend on the site or application) and where you have come to the site or application from, so that we can improve the site or application and in order to learn which parts of the site and which functions of the application are most popular with users; remembering that you have visited us before. This means we can identify the number of unique visitors we receive. This allows us to make sure we have enough capacity for the number of users that we get. **Functionality** remembering whether you have completed the Survey before; preventing fraudulent completion of the Survey (i.e. if someone tries to complete the same Survey more than once); customising elements of the promotional layout and/or content of the pages of the site or application in order to improve your experience of the site or application. Other undertaking research and statistical analysis in relation to your browsing of the site or use of the application.
- We may store information about you using cookies which we can access when you visit our site or use the application in the future.
- Cookies do not usually include personal data; however they may contain the type and version of internet browser you use, the type, manufacturer and model of the computer or mobile device you use, any website from which you have come to the site or application, your IP address, the operating system of your computer or mobile device and internet log information.
- If you want to delete any cookies that are already on your device, please refer to the instructions for your file management software to locate the file or directory that stores cookies.
- Information on deleting or controlling cookies is available at [www.AboutCookies.org](http://www.AboutCookies.org) . Please note that by deleting our cookies or disabling future cookies you may not be able to access certain areas or features of our site or application.
- We work with external suppliers who may also post cookies on the site or application, such as:
  - Google analytics;
  - Mixpanel;
  - Facebook;
  - Mailgun;

- and Adwords.

This list may evolve in the future, in which case this Privacy Policy will be updated accordingly.

These external suppliers are responsible for the cookies they post on the site or application and, for more information about these cookies, you should refer to their specific privacy policies.