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# Child Friendly Privacy Statement for the Tozi Application

*Hi there! We know that privacy information is boring and sometimes confusing. So we tried to break down a simple version that might be more understandable for you.*

## Who's behind Tozi?

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The Tozi team are:

- Vodafone Ireland Foundation and Vodafone Ireland who provided the technology and hosting of the App,
- Dublin City University (DCU) Anti-Bullying Centre who provided the content, and
- ISPC/Childline who provided a 24 hour text/call service in case you need it for anything.

In this privacy notice “we/us” means Vodafone Ireland Foundation.

Vodafone Ireland Foundation and Vodafone Ireland are the Joint Controllers of your personal data that is collected as part of the App because we decide together 'why' and 'how' the personal data should be processed. Being a Controller of personal data also means that we are responsible for protecting it.

When we refer to ‘personal data’ in this notice, we mean any information that relates to you and that can be used to identify you. It does not include information that can't identify you (this is also known as ‘anonymous information’).

## How does Tozi use my information/ data?

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The Tozi App has two main parts: the Cosmos and My Space.

The Cosmos part of the App which includes content for you to access, including articles, videos, quizzes and podcasts. It only records data that can help Tozi us make the App work better in the future (this is called App diagnostic data).

The My Space part of the App involves setting up a profile and providing some basic personal data like your age and a username. You will be also asked to set up a 6-digit pin to protect the information you enter.

If you are under 16 years of age, we will ask for your **parent or legal guardian's email address** for their consent to us accessing and using your data and your device's storage so you may use My Space at your convenience. Your parent/legal guardian will not be able to access any of your data when your account is set up.

## Specifically, what data is collected?

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The personal data we collect is your

- PIN ,
- Control questions and other information necessary to verify identity when logging in,
- Age,
- Parent email address, if you are under 16
- Username,
- App diagnostic data
- Permissions from the device (around storage and microphone access).

Tozi can also store information you choose to record in the MySpace area as notes and voice recordings. Under the law, some types of personal data is considered more ‘sensitive’, and we have to take more steps to protect it. This is also known as ‘special category data’. We might process some ‘special category data’ from you, specifically data about your health that you might provide when you use the Tozi app, when you make any notes or recordings in the My Space area.

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## What data does TOZI not collect?

Before we can access and use your personal data, we have to have a reason that is set out in law. This reason is sometimes known as a 'legal basis'.

We will process your data under two legal bases as part of the Tozi App. This is because we process some of the data for one purpose and the rest of the data for another.

The first legal basis that we rely on is called Legitimate Interest. This means that we can process personal data where this is of some benefit to us, as long as our benefits (or 'interests') are not outweighed by your own rights and interests.

We use this legal basis to process:

- App diagnostic data so that we can make sure the App works properly; and
- Your PIN number, age, e-mail address and username, so that you can create your account and log in and out of it.

We cannot use this data for any other purpose in any way that harms your rights.

The second legal basis that we use is Explicit Consent. This means that we will only process some personal data where we have your permission, or – if you are under 16 years of age – the permission of your parent/legal guardian.

We need your explicit consent to process your data stored in the MySpace area which in some cases might be considered health data. We also ask for your consent to access the storage on your device. And if you are under 16 years of age, we have to get consent from your parent/ guardian by law to allow you to use the My Space section.

This is because, in the Republic of Ireland the "age of digital consent" or the age at which children should be able to consent to the processing of their personal data in an online context without parental involvement is 16.

You can withdraw your consent at any time by contacting the Tozi team at [info@to-zi.com](mailto:info@to-zi.com). Please provide your unique username so that we can identify you.

## What are my rights?

You have rights when it comes to your personal information. However, we cannot access all of your data which may limit what we can do on your behalf. You have the following rights:

The right to access – you can access all of your data through the Tozi App and you can also ask us to provide you with any data that we hold about you. Please note that we cannot access any of your personal data stored on your device through the My Space area. The only data that we process is the data that we use to confirm your identity. We are unable to access data related to your security in a readable format.

The right to rectification – if some of your data isn't right, you can rectify or update this through the application. Every journal entry can be edited by you. You can also amend your username and login information. If we hold data about you that isn't right, you can also ask us to correct it.

The right to restrict processing – you have the right to request that we restrict the processing of your personal data. If you do this, we will disable your account, which means you won't be able to access to the My Space area. You will still be able to access the Cosmos area and its content.

The right to erasure – we remove the personal data that we hold about you on our systems (in other words the data that we hold to let you log in and to protect access to your account) automatically after you have not used the app for 1 year. However, please note we cannot access (and therefore cannot delete) data stored on your device in the My Space area such as your mood and feelings tracker. You will be able to delete this yourself using the deletion function available for each entry in the My Space area of the app by swiping left on the entry you wish to delete and selecting 'delete'. You can delete all of your data at once through your device's application settings by selecting "Delete storage" or "Clear my data" (wording may differ depending on your device). Please note that in the event of a lost or stolen device, we can fully disable your account preventing any access to the My Space area, even with a PIN. Details on how to contact us and make a request to disable the app are provided below.

The right to object to processing – You have the right to object to our processing of your personal data under certain conditions.

The right to data portability – you have the right to request that we transfer the data that we have collected to another organisation, or directly to you under certain conditions. However, as mentioned above, we cannot access any of your personal data stored on your device through the My Space area and so we will not be able to transfer this information.



The right to withdraw consent – If you provide us with your consent to process your personal data, you can remove that consent. Where we rely on your parent or guardian’s consent to process your personal information, you still have the right to withdraw your consent at any time. If you choose to withdraw your consent, we will disable your account preventing any access to the My Space area, even with a PIN.

If you want to ask us any questions or make use of the rights described above, please contact us at [info@to-zi.com](mailto:info@to-zi.com). Please include your unique Tozi username to facilitate the identification of your account.

If you want to contact us about any of your rights, or to enquire or make a complaint about how we use your information, please contact us at [info@to-zi.com](mailto:info@to-zi.com). We’ll do our best to help but if you’re still unhappy, you can contact Data Protection Commission. Contact details for the Data Protection Commissioner are:

- Email: [info@dataprotection.ie](mailto:info@dataprotection.ie)
- Phone: **+353 (0)57 868 4757** or **+353 (0)761 104 800**
- In writing: Data Protection Office, 21 Fitzwilliam Square, Dublin 2, D02 RD28.

## ***How long does Tozi keep my information/data?***

The data that you provide as part of the Tozi app is held as long as you are active on Tozi.

It will be removed from our servers if you do not use Tozi for 12 months. You can delete your data anytime through the applications ‘delete’ function or your devices application settings. Please note that in the event of a lost or stolen device, we cannot access and therefore cannot delete data stored on your device. Instead, we can fully disable your account preventing access even with a PIN. To make a request please contact us at [info@to-zi.com](mailto:info@to-zi.com). Please include your unique Tozi username to facilitate the identification of your account.

## ***Is my data shared?***

The only data that we share is unidentifiable statistics data (e.g. how many users clicked on an article) to help the DCU Anti-Bullying Centre do research to improve content. This means that the information that we share cannot be used to identify who you are.

If Tozi needs help from partners in other countries to make the App better, we might need to share some of your data with them. But if this happens, we will make sure that they will also protect your data to a high standard.

## ***How is my data protected?***

It is the law for the Tozi team to protect your personal data in every reasonable way possible. We promise to only use your data in the way we say we will.

As much as we will do everything we can to protect your data sometimes bad things like cybersecurity breaches can happen no matter how secure we try to make the App. So we cannot promise 100% security for everything.

If you are feel that your data is not secure using Tozi, do contact us immediately: [info@to-zi.com](mailto:info@to-zi.com).

## ***Other websites***

The App contains links to the Childline chat service and helpline. When you click on these links, you are entering a separate website or dialling a phone service, and these separate services handle your personal data in a different way to us, under their own standards and for their own reasons We recommend you look up their own privacy policies to understand how they will process your data.

## ***Changes to the privacy policy***

Updates happen from time to time. So if we need to make any big changes to this policy, we will do our best to let you know immediately. You can find more information in the “Privacy Notice” on the App itself.