

Scope

1. The OU Anywhere app is built and maintained by The Open University (OU), UK. It is a free, optional app designed for current OU students to easily download offline material to their tablet/phone and access their module website. The app is essentially a simplified front end to the normal VLE, and the ability to view online module content and download offline versions such as EPUB and PDF file (where supplied) can also be accomplished by using a normal web browser signed into OU Student Home.
2. This notice is designed to inform readers about how the app collects and uses personal data. It applies to you if you download and sign into the OU Anywhere app.
3. The terms used in this Privacy Notice have the same meanings as in the Conditions of Use regarding OU website policies and statements. They are available at <http://www.open.ac.uk/about/main/strategy-and-policies/policies-and-statements>.

Who we are

4. The Open University (OU) is the data controller in relation to the processing activities described below. This means that the Open University decides why and how your personal information is processed.
5. Where this document refers to “the OU”, “we”, “our” or “us” below, unless it mentions otherwise, it is referring to The Open University.

What information do we collect about you, and how do we collect it?

Information that you give to us

6. To use the OU Anywhere app, we require you to sign in with your Personal Identifier (PI) or OU Computer Username (OUCU) and password. This is the same (and uses the same system processes) as directly signing into our module websites using a web browser.

Information that we collect automatically

7. Your sign-in data is validated against your OU record. This includes your full name and modules that you are studying or have recently studied.
8. For support purposes should you encounter an issue, the app collects additional data about the device that it is installed on, such as hardware model and operating system. This is displayed on the ‘About’ screen.
9. No data is collected by merely installing and opening the OU Anywhere app. Data collection only happens against your user account once you have successfully signed in.
10. When you sign in to the app, we collect Log Data about how you use the app. The Log Data includes use statistics (e.g. the time and date you start and stop using the app, and which

files you downloaded) but is aggregated to the module level so that it is not individually-identifiable. The data is retained as part of the OU's normal data retention policy for website access.

11. We do not collect offline usage data.

Cookies, third-party apps, and third-party websites

12. Viewing the module website using the Study Planner link will open the website in the in-app web browser, which will download Cookies to enable you to interact with the module website. Cookies are small files commonly used as unique identifiers which are sent to your browser, where they are stored on the device's internal memory. It is also possible that website-side analytics will be able to associate your access with some information about the device, such as browser information and the operating system of the device. For more information about how the OU uses cookies on its website, please see our [Privacy and Cookies page](#).

13. Viewing the module website files that you download via OU Anywhere requires a separate third-party eBook reading app. Users of iOS-based devices have a pre-provided default system app called iBooks. Users of Android-based devices may need to install a third-party app. We do not pass any personal data to third-party reader apps. The apps will have their own policies for data collection and use.

14. The OU Anywhere app includes links to OU and OU-related websites. If viewing your VLE module website, then you may follow links to external websites. The OU cannot be held responsible for the content or behaviour of third-party websites.

Information that we receive from third parties

15. Our Google Play Store and Apple Store administrators (who are OU staff members based on campus) receive aggregate download statistics, as well as review and rating data, from those stores. No attempt is made by the OU to connect store reviews to OU students.

How do we use your personal information?

16. It is in our legitimate interest to use the data we collect, in order to operate the app, and identify improvements to our services. We will also use the Log Data for troubleshooting, should you call the OU Computing Helpdesk to report an issue.

17. We will not use or share your information with any third-party.

Who do we share your information with?

18. We use a third-party service provider for app maintenance and development, but they do not access any user data. They use limited test accounts for testing, which allows access to module websites, but the accounts cannot access any collaborative activities such as module forums. Any user-specific investigations (such as if you call to Computing Helpdesk to report an issue with the OU Anywhere app) are investigated by the OU Anywhere Manager and IT Lead Developer, both of whom are campus-based.

19. In the unlikely event that any personal information is shared with our offshore developers, we would only disclose to them personal information that is strictly necessary for them to provide their service. Our contract with them requires them to keep your information secure and not to use it other than in accordance with our specific instructions.

Do we transfer information outside the EEA?

20. Generally, information you provide to us is stored on our secure servers, or on our cloud-based systems which are located within the EEA.
21. However, there are times when we do need to store information outside the EEA. If we transfer your information outside of the EEA, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this policy. This would either be imposing contractual obligations on the recipient of your personal information or ensuring that the recipients are subscribed to 'international frameworks' that aim to ensure adequate protection. For example, we would ensure that a US based supplier has signed up to "Privacy Shield".

How long do we keep your personal information for?

22. If you are current or former OU student, then you will be able to sign into the OU Anywhere app. Once you have signed into the app, the app retains your sign-in data until you sign out of, or uninstall, the app.
23. As you own your device(s), if you have installed the OU Anywhere app and are signed in to the app, you are responsible for any security breaches that occur should your personal data and/or OU-owned and licensed content be subject to unauthorised following your mobile device become lost or stolen. For this reason, it is recommended that you sign out of the OU Anywhere app following your use of it.
24. Further information about the OU's general data retention can on the OU's [Policies and Statements webpage](#).

Your rights

25. You have a number of rights in relation to your personal information, which apply in certain circumstances. To exercise any of these rights, please contact us using the details in the final section of this document.
26. You have the right:
 - To access your personal information that we process
 - To rectify inaccuracies in the personal information that we hold about you

In some circumstances, you also have the right:

- To have your details removed from systems that we use to process your personal data
- To restrict the processing of your personal data in certain ways
- To obtain a copy of your personal data in a structured electronic data file
- To object to certain processing of your personal data by us
- To request that we stop sending you direct marketing communications.

If you are concerned about the way we have processed your personal information, you can complain to the Information Commissioner's Office (ICO). Please visit the ICO's website www.ico.org.uk for further details.

Contact us

27. Please direct any queries about this document or about the way we process your personal information to our Data Protection Officer using the contact details below.

- Email data-protection@open.ac.uk
- Telephone +44 (0)1908 653994
- By post: The Data Protection Officer, PO Box 497, The Open University, Walton Hall, Milton Keynes MK7 6AT.

28. Further information can be found on our [Privacy and Cookies](#) page.