

# STEPS Privacy Notice

## Introduction

STEPS is an app used in the OPTIMA programme of research organised by researchers from Kings College London (KCL) and the universities of Southampton and Nottingham.

KCL determines how and why your personal data is processed for STEPS. This means that KCL is the 'controller' of your personal data for the purposes of data protection law.

Please read this Privacy Notice carefully – it describes why and how we collect and use personal data and provides information about your rights in accordance with the general data protection regulation (GDPR). It applies to personal data provided to us by individuals themselves or by third parties, and it supplements the following wider KCL Privacy Notice(s):

- [KCL Core Privacy Notice](#)
- [KCL Statement on Use of Personal Data in Research](#)

We keep this Privacy Notice under regular review. It was last updated on 7 September 2021.

## The types of personal information we collect

Personal data, or personal information, means any information about an individual from which that person may be identified. It does not include data that cannot be traced back to you (i.e. anonymous data). We will collect, use, store, retain and transfer the following personal data about you:

- email address
- phone number
- IP address
- device ID

## How we collect and use your personal data

Most of the personal information we process is provided to us directly by you through the online forms that you complete. We also receive personal information indirectly from the STEPS app.

We will only use your personal data when the law allows us to. We use this information for the following purposes:

- To register you as a study participant and give you access to the STEPS app.
- To keep in touch with you about the app and its performance.
- To send you information about new versions of the app.

The processing is based on your consent, you have the right to withdraw your consent at any time by contacting us using the details set out below. Please note that this will not affect the lawfulness of processing based on consent before its withdrawal.

We may also use anonymised data, meaning data from which you cannot be identified, for the purposes of:

- Education and research,

- Publication in reports or journals and at conferences.

## How we store your data

Email addresses and phone numbers necessary to create an account will be stored within Google and Apple servers. Device IDs and IP addresses used to collect usage data by Firebase Analytics will be stored with Google servers. After data collection has been completed, data will be transferred onto the KCL network drive and Google Firebase account and all the data contained within the account will be deleted. We have technical and operational security measures in place to prevent your personal data from being accessed, used, altered, or disclosed in an unauthorised way. We have established procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. We will keep your personal data according to the KCL [Records Retention Schedule](#) after which point it will be securely destroyed.

## Who will process your personal data?

Your personal data will be collected and processed by the OPTIMA team at King's College London; access to your personal information is limited to staff who have a legitimate need to see it for the purpose of carrying out their job. We will also need to share your personal data with the parties set out below. When we allow them access to your data, we do not permit them to use it for their own purposes.

Bitjam Ltd. (to help resolve any technical issues)

Google

Apple

The University of Southampton

The University of Nottingham

We vet all third parties and require them to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes – they are only allowed to process your personal data for specified purposes in accordance with our instructions as outlined above.

## Lawful basis for processing

Data Protection legislation requires that we meet certain conditions before we are allowed to use your data in the manner described in this notice, including having a "lawful basis" for the processing.

The lawful bases for processing your personal data will be public task - "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"

## Your rights

Under certain circumstances, you may have the following rights under data protection legislation in relation to your personal data:

- Right to request access to your personal data;

- Right to request correction of your personal data;
- Right to request erasure of your personal data;
- Right to object to processing of your personal data;
- Right to request restriction of the processing your personal data;
- Right to request the transfer of your personal data; and
- Right to withdraw consent.

If you wish to exercise any of these rights, please contact us using the details set out below

## Contacting us

You can contact OPTIMA team by:

- emailing at [OPTIMA@kcl.ac.uk](mailto:OPTIMA@kcl.ac.uk)
- telephoning on 020 7848 3682, or
- writing to:  
OPTIMA Trial Manger  
Department of Child and Adolescent Psychiatry-PO85  
Institute of Psychiatry, Psychology & Neuroscience  
King's College London  
16 De Crespigny Park  
London SE5 8AF.

Additionally, KCL has appointed a Data Protection Officer. If you have any questions about this Privacy Notice, including any requests to exercise your legal rights, you can contact our Data Protection Officer using the details set out below:

Email: [info-compliance@kcl.ac.uk](mailto:info-compliance@kcl.ac.uk)

Telephone: +44(0)20 7848 7816

Postal Address:

Data Protection Officer  
Department of Business Assurance  
King's College London  
Room 5.35  
James Clerk Maxwell Building  
57 Waterloo Road  
London SE1 8WA

## Complaints

If you wish to complain about our use of personal data, please send an email with the details of your complaint to the Data Protection Officer so that the issue can be investigated.

You also have the right to lodge a complaint with the Information Commissioner's Office (**ICO**) (the UK data protection regulator). For further information on your rights and how to complain to the ICO, please refer to the [ICO website](#).