

(d) **Users:** Sprockler processes personal data for those Visitors who create an account and by doing so become Users of our web applications for narrative research. In section 3 of this Privacy Policy, we explain in detail which personal data we process, how and why we process those and what your rights are under the General Data Protection Regulation ("GDPR").

Your identity is yours and will always be. We do use cookies in a minimal way to help us to help you. Thank you for taking the effort to read our Privacy Policy. We also encourage you to review our [cookie policy](#) and the [Terms of Service](#), which is the agreement between you and Sprockler that governs your use of the web applications. If you do not agree with our Privacy Policy, please do not use our web applications.

### 3. GENERAL/PERSONAL INFORMATION OF USERS

(a) **Required info:** Terms of Service, you will not be able to use the web applications if you do not have a valid email address (policy). Please do not hesitate to contact us at [info@sprockler.com](mailto:info@sprockler.com) for payment/invoicing information.

(b) **Privacy policy and Terms of use:** When you create an account to use our web applications, we ask you to agree in advance with our Privacy Policy and Terms of Service.

(c) **Required info:** Any visitor can sign up for an account. As a Visitor you will then have to register with your name and your email address to become an authorized User. These personal data will be stored in a secure way.

### 1. VISITORS, USERS AND PARTICIPANTS

We consider three types of interaction with Sprockler. At first people that visit our website but do not create an account will be referred to as "Visitors". People that register and create an account will be referred to as "Users". People who participate in inquiries after the account has been invited to the email remains unanswered for a period of another month the account and the corresponding data will be deleted. If you would like to learn more about how we collect personal data, using cookies or similar technologies, please read our [Cookie Policy](#). All the inquiries conducted will be deleted after this period of 4 months.

(e) **Contacting you:** Sprockler may use your registration information to contact you to:

- Deliver the Service of the web applications.
- Improve our Site, Service, features and content.
- Provide customer service and personalize your experience.

### 2. PERSONAL DATA

(a) **Visitors:** Sprockler is not interested in the identity and personal details of our Visitors. Therefore, we do not store email addresses from our Visitors. If you have any questions, please contact us at [info@sprockler.com](mailto:info@sprockler.com).

(b) **Participants:** We do not store email addresses from the Participants who are invited to engage in an inquiry. Sometimes it happens that the Users will need these email addresses to invite Participants for an inquiry but even then, we will not store the email addresses. Instead, we only store a so-called hash from which email addresses cannot be retrieved. The hash enables us to know that a certain set of responses comes from one Participant.

### 4. ACCESS TO INQUIRIES AND RESPONSES

(a) **Participants rights:** If you are an authorized User, you can administer and control your own inquiries. Sprockler only functions as a Service provider. The Participants can access the inquiry in data-collection mode only. According to article 15 of the GDPR, Participants have the following rights with respect to the information they provided to the User via the inquiry:

(c) **Breaking anonymity:** There are legitimate situations where anonymity is not desirable. The User may include questions that ask Participants to share personal details like an email address. Only the Participant him/herself can decide to offer these details. We consider this to be the most transparent way of breaking anonymity.

- The Right to rectification;
- The Right to erasure (the "right to be forgotten");



- The Right to restrict processing;
- The Right to object.

The authorized User is responsible for the implementation of these essential features.

- (b) **Rights of colleagues:** Typically, the person who registered for the account will be the only person who can access the inquiries and the responses. Your organization may want to share your account to allow colleagues to support you in the inquiry. This is technologically possible. However: the GDPR requires that you undertake the necessary steps which are (1) informing the Participants and (2) signing a Data Processing Agreement with these colleagues. Sprockler has a standard Data Processing Agreement available for this purpose. It is possible to grant your colleagues limited rights only. The person who created the account from an organization will be granted administration rights in all cases. They can create other accounts and set their rights.
- (c) **Technical support:** As a User you own the inquiry data. We do not use your data, unless you request us to do so for technical support. In case you need technical support, you will grant access to the administrator of Sprockler to access your data. The administrator of Sprockler signed a nondisclosure agreement to this purpose.
- (d) **Maximum retention period:** We will remove personal data and data of inquiries from our servers upon your request. The user him/herself is responsible for the implementation of the GDPR regulations with respect to the maximum retention period of personal data.
- (e) The GDPR states that personal data may only be kept for the period necessary for the purposes for which the data was processed. Note: research reports as such (for instance created in the visualizer application) may be retained for a much longer period (up to 10 years). However personal data such as email addresses of participants or any information which can be traced to a specific person, may only be kept in a form that permits identification of the individual for no longer than is necessary for the purposes for which it was processed, in other words the research period only. An exception can be applied to longitudinal research under the condition that personal data will be anonymized (no longer traceable at all).

## 5. DATA SECURITY

- (a) **TLS:** Data security is very important to us. To that end, communications with our servers make use of Transport Layer Security (TLS version 1.2) including the communications between the iOS and Android apps and the server (uploading of responses of Participants). TLS is a cryptographic protocol that provides secure communication between the server and the computer of a Visitor, User or Participant. It's more or less the successor of SSL protocol (which is used by the majority of banks).
- (b) **Encryption on mobile:** The Collector app also encrypts data that are temporarily stored on mobile devices. These data are removed from the device after the server confirms their receipt.



- (c) **Secure server:** Sprockler outsources hosting and technical maintenance of our site and the three web applications to TransIP, which is a renowned hosting provider.

## 6. LINKS TO OTHERS SITES OR SERVICES

The Sprockler Site may contain links to other websites. Please be aware that Sprockler is not responsible for the privacy practices of these websites. This Privacy Policy applies solely to information on this Site and its three web applications.