# SalaryTrac Data Usage and Privacy Policy

# Last updated: 8 November 2024

At **SalaryTrac**, the sole trader owner of the SalaryTrac app ("we") value your privacy and are committed to being transparent about how we collect, use, and protect your data. This policy explains what information we collect, why we collect it, and how we use it.

## 1. Information We Collect

We collect the following types of data to provide our services:

- **Personal Information**: This includes only your email address when creating an account.
- **Usage Data**: Information about how you interact with our app, including features you use, the time spent on the app, and in-app interactions.
- **Device Information**: We do not collect IP address, device type or browser type. We do collect operating system for the sole purpose of ensuring use of latest app version.
- **Benchmark Data**: Any data that you provide or allow the app to collect for benchmarking purposes (as set out in the 'data input' section of the SalaryTrac app).

#### 2. How We Use Your Information

We use your data to:

- **Benchmark and Analyse**: We aggregate and anonymise your benchmark data to generate insights and comparisons for the personal use of you and other users.
- **Improve Our App**: Usage data helps us understand how users interact with the app, allowing us to make improvements.
- **Communicate with You**: We may use your personal information to send you updates and respond to your inquiries.

#### 3. Legal Basis for Data Processing

Personal information falls under the scope of GDPR. Benchmark Data is collected and stored anonymously, which means that Benchmark Data cannot be linked back to an individual (even indirectly), and therefore the Benchmark Data is not subject to GDPR. However, we take data security extremely seriously and therefore we apply GDPR principles to both personal information and benchmarking data. We are the data controller. We process your data under the following bases:

- **Consent**: We collect and use your data with your consent.
- **Legitimate Interest**: We may process your data to improve our app, provided that it does not override your interests.
- **Contract**: Your data may be processed to fulfil the contract (i.e., to provide the services outlined in our Terms of Service).

• **Security**: Your data is encrypted both in transit and at rest. Only authorised personnel can access the raw data.

## 4. Data Security

We use industry-standard security measures to protect your data, including encryption, secure servers, and access controls. While we strive to protect your personal data, please note that no system is completely secure.

#### 5. Data Retention

We will retain your personal data for as long as your account is active or as needed to provide our services. You may request that we delete your email address at any time by contacting us. Note that, as all remaining data is anonymous even to us, we will not be able to delete the data points you submit for benchmarking purposes.

#### 6. Your Data Choices

## Benchmarking data

Benchmarking data collection is anonymous. This means that the data cannot be linked back to an individual (even indirectly). Therefore certain choices are not possible:

- Access and Download: You cannot access or request a copy of your benchmarking data because we do not have a way of knowing which data points are yours.
- **Correction**: If your data is inaccurate, the only way to request that it be corrected is to email us with the complete list of data submitted so that we can locate it in the database and delete it. You will then need to re-submit a new set of data. Note that in practice this may be difficult because you will need to remember the data you entered there is no record kept of who entered what nor is a message sent to you with a list of your entries (in order to ensure complete anonymity).
- **Deletion**: You cannot request that we delete your data points as we will not be able to locate data points you have submitted due to its anonymity.

#### **Personal information**

- Access and Download: You can request a copy of your personal information by emailing us at the email address at the bottom of this policy.
- **Correction**: You can change your email address and password in the account management page of the app.
- **Deletion**: Using the 'delete account' feature within the account management page of the SalaryTrac app will delete all the personal information we hold. Alternatively email us, including the email address used to create your account, and we will delete your personal information for you (note that this will delete your SalaryTrac account).

**Opt-Out**: You can opt out of email communications by following the unsubscribe instructions in our emails or contacting us directly.

## 7. Cookies and Tracking Technologies

We may use cookies and similar tracking technologies to collect information about your activity within the app and on our website. This helps us understand user behaviour, improve user experiences, and deliver personalised content.

You can control cookie settings through your browser or device, and you can disable non-essential cookies at any time.

## 8. International Data Transfers

If you are using our app across the globe, your data may be transferred to and processed in other countries, where our servers are located. We take steps to ensure that your data is protected, regardless of where it is processed.

## 9. Sharing Your Information

We take the protection of your data seriously. We may share data with:

- **Service Providers**: We may share your data with third-party service providers who help us operate our app, such as hosting services, analytics providers, or customer support platforms. Any providers we use are bound by confidentiality agreements and can only use your data for our specified purposes.
- **Legal Obligations**: We may disclose your data if required by law, regulation, or legal process.
- Anonymous data cannot be traced back to you personally. Aggregated data may be shared with third parties for analysis, reporting, or commercial purposes.

## 10. Children's Privacy

Our app is not intended for users under the age of 16, and we do not knowingly collect personal information from children. If we discover that a child under 16 has provided us with personal data, we will take all available steps to remove it, although due to the anonymous nature of the data it may not be possible to remove all data.

## 11. Changes to This Policy

We may update this policy periodically to reflect changes in our practices or legal requirements. If we make significant changes, we will notify you via email or within the app. Please review this policy regularly to stay informed.

#### 12. Contact Us

If you have any questions about this Data Usage Policy, or if you wish to exercise any of your rights regarding your personal data, please contact us at:

• **Email**: salarytrac@gmail.com

# Consent

By using SalaryTrac, you agree to the terms outlined in this Data Usage Policy.