

# Rensselaer Polytechnic Institute

## Privacy Policy

Effective date: October 1, 2018

Rensselaer Polytechnic Institute ("us", "we", or "our") operates the website and the Adaptive Use Musical Instruments (AUMI) mobile application (hereinafter referred to as the "Service").

This page informs you of our policies regarding the collection, use and disclosure of personal data when you use our Service and the choices you have associated with that data.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, the terms used in this Privacy Policy have the same meanings as in our Terms and Conditions.

# Definitions

- **Service**  
Service means the website and the Adaptive Use Musical Instruments (AUMI) iOS mobile application operated by Rensselaer Polytechnic Institute
- **Personal Data**  
Personal Data means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).
- **Usage Data**  
Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).
- **Cookies**  
Cookies are small files stored on your device (computer or mobile device).
- **Data Controller**  
Data Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed. For the purpose of this Privacy Policy, we are a Data Controller of your Personal Data.
- **Data Subject (or User)**  
Data Subject is any living individual who is using our Service and is the subject of Personal Data.
- **Administrator**  
The Administrator is an administrator, teacher, or therapist who helps the Data Subject/User set up and configure AUMI.

# Information Collection and Use

We collect several different types of information for various purposes to provide and improve our Service to you.

## Types of Data Collected

### Personal Data

While using our Service, we may ask you to provide us with certain personally identifiable information. An AUMI user can optionally save configurations of the program under a user's name.

### Usage Data

AUMI optional collects data on how the application is operating and optionally associates it with the User, among other identifying metadata, which is manually entered by the Administrator.

# Use of Data

AUMI collects data on the actions performed with the AUMI app. This includes data on the kind and amount of motion it has detected and what musical events have occurred. This data can optionally be tagged with metadata indicating the User, the class or program the user is a member of, the Administrator or therapist, and the institution where AUMI is being used. Rensselaer Polytechnic Institute does not collect or use the data itself in any way. The data is retained on the device until an Administrator decides to export that data. The data can also be erased by an Administrator.

# Legal Basis for Processing Personal Data under the General Data Protection Regulation (GDPR)

If you are from the European Economic Area (EEA), Rensselaer Polytechnic Institute legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

Rensselaer Polytechnic Institute may process your Personal Data because:

- We need to perform a contract with you
- You have given us permission to do so
- The processing is in our legitimate interests and it is not overridden by your rights
- To comply with the law

# Retention of Data

Rensselaer Polytechnic Institute retains no personal or usage data created by AUMI.

The responsibility for retaining or maintaining the data logged by the program is with the Administrator.

## **Transfer of Data**

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction. If you are located outside United States and choose to provide information to us, please note that we transfer the data, including Personal Data, to United States and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer. Rensselaer Polytechnic Institute will take all the steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

## **Disclosure of Data**

### **Legal Requirements**

Rensselaer Polytechnic Institute collects no data, and therefore has no data to disclose.

## **Security of Data**

The security of your data is important to us but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

# **Our Policy on "Do Not Track" Signals under the California Online Protection Act (CalOPPA)**

AUMI is not a web based application, and uses no web services, and as such does not track.

# Your Data Protection Rights under the General Data Protection Regulation (GDPR)

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. Rensselaer Polytechnic Institute aims to take reasonable steps to allow you to correct, amend, delete or limit the use of your Personal Data.

If you wish to be informed about what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

- **The right to access, update or delete the information we have on you.** Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.
- **The right of rectification.** You have the right to have your information rectified if that information is inaccurate or incomplete.
- **The right to object.** You have the right to object to our processing of your Personal Data.
- **The right of restriction.** You have the right to request that we restrict the processing of your personal information.
- **The right to data portability.** You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.
- **The right to withdraw consent.** You also have the right to withdraw your consent at any time where Rensselaer Polytechnic Institute relied on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

# Service Providers

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), provide the Service on our behalf, perform Service-related services or assist us in analyzing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

## Links to Other Sites

Our Service may contain links to other sites that are not operated by us. If you click a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

## Children's Privacy

Our Service does not particularly address anyone under the age of 18 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

# Changes to This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

## Contact Us

If you have any questions about this Privacy Policy, please contact us:

- By email: [braasj@rpi.edu](mailto:braasj@rpi.edu)
- By visiting this page on our website: <http://aumiapp.com/policy>