

Therapy Box Internet security & Protection of Private Information policy

Policy last reviewed on 24th January 2017 should be reviewed at least once every 12 months, and made accessible to all members of staff.

Preface

The purpose of this policy is to ensure that the applications developed by Therapy Box keep the personal information provided to it by clients (and provided to its clients by their customers) as secure as possible. Giving personal information or data to unauthorised personnel is unacceptable and must be mitigated against at every opportunity.

Therapy Box often provides apps and services for vulnerable clients so it is especially important that unnecessary personal data is not collected or kept, and that all personal information entrusted to Therapy Box or to a client is kept as secure as possible.

Please note that this policy refers only to data collected within our apps. A review of our privacy policy for website users is currently underway.

Data Collection

Therapy Box will only build apps to collect data on customers if there is a clear advantage to the customer to do so. Circumstances in which data collection are acceptable include (1) where the purpose of the app is for medical research and the app is an important measuring tool, (2) where data will be used to provide an improved app with features beneficial to the client, (3) where the client willingly shares – for example – contact details, so that they can be reached by Therapy Box or one of its clients for the purposes of provision of relevant information.

The merits of data collection will be assessed on a case by case basis.

Many of our apps will contain anonymised data regarding crash statistics and app usage, in order to provide a better user experience. No identifying information will be collected. We will not include analytics software in apps developed exclusively for use by children (for example, the skoodal flashcards games).

NB: It is likely in many circumstances that *some* data collection will be necessary, but Therapy Box should always aim to collect as little irrelevant personal information as possible – justified need to collect some data should not be considered sufficient reason to “open the floodgates” and collect additional personal data without a clear understanding of both the benefits and the risks.

Transparency

In cases where personal information is being collected by an app or web development, a terms of service should be written explaining exactly what information is being taken *and* why it is required. Terms of service should be written in plain English, they should be kept short enough to *actually* be readable, and the most important information should be presented in a bold or distinct font. The user should be required to opt *in* to the terms of service before data is collected, rather than having data collection as an opt-out.

If data collection is a pre-requisite of app use (justifiable in certain cases, e.g. medical research apps), then this should be clearly explained to the user.

Data Anonymisation

If it is possible to anonymise data or personal information, without negating the original purpose of the data/information collection, then this will be done within the app, prior to sending data or personal information out of the app.

Encryption

Personal data and personal information must be encrypted using SHA-2 encryption as a minimum, before it is transferred between an app and its backend.

Secure Hosting

Therapy Box uses cloud hosting from third parties, and takes responsibility for ensuring that the hosting is secure. Therapy Box will utilise SSL & SFTP where possible to keep client data, information and documentation secure.

Sharing information

Therapy Box will not share its customer's data or information with third parties unless (a) necessary and (b) explicitly permitted by the end user. Therapy Box will not access the personal data of its clients' customers unless it is (a) necessary, (b) explicitly permitted by the client, and (c) explicitly permitted by the end user.

Passwords

Where Therapy Box creates passwords for a client, the password will be at least 12 characters in length, contain at least 1 capital letter, 2 numbers and 2 special characters. Therapy Box will share information with the client on how to change the password as soon as it is not necessary for Therapy Box to have password access anymore.

Users who contact us

All apps provide users with an opportunity to contact us. In these cases we may retain customer details for marketing purposes, although we will remove any customer information from all marketing databases on request. We will not pass contact information on to any third parties, unless explicitly permitted to do so by the user, and clearly beneficial (for example, if it would be useful in resolving a support query).

If a user who contacts us is under 18, we will not share any information provided to us to a third party, unless explicitly permitted to do so by a parent or guardian.

Apps which users are not able to use without creating an account

Predictable for Android

Apps where users may create a cloud account, but can use the app without doing so (storing all changes online only)

Predictable for iOS

ChatAble v3 (due for release 2017)

Apps without cloud accounts & where all data is locally stored

Skoodal apps range include Biff Chip and Kipper flashcards and Phonics Spelling Dictionary.

Dubdub range including Minimal Pairs and Odd One Out.

Scene & Heard (backup by Dropbox is possible, this uses Dropbox API)

Inku (backup and syncing is possible using third party APIs)