



Privacy Impact Report – June 2020

Date	Review Outcome
July 2017	Initial draft.
January 2018	Removed reference to the use of video as this functionality has been removed. Added flow for sentiment diary functionality.
May 2018	Completed in line with GDPR implementation.
November 2018	Reviewed following draft of Processing Activities Log.
March 2019	Reviewed following the appointment of Amazon Web Services (AWS) to assist ImproveWell LTD with connectivity and cloud-hosted servers, and Zendesk to support ImproveWell LTD's 24/7 customer support ticketing system. Updated data flow maps following launch of new corporate website and three core feedback systems. Added appendix B: system diagram.
January 2020	Added Appendix for Brexit Assessment, removed UKFast Servers as a processor
June 2020	Added Appendix D – Proportionality of Automatically Collected Data

Party	Role	Processing Categories	Data Categories	Processors	Sub-Processors
App User	Data Subject	Information related to quality improvement, including basic information about the App User	Personal Data (low risk, very minimal)	N/A	N/A
ImproveWell LTD	Data Controller	Information related to quality improvement, including basic information about the App User	Personal Data (low risk, very minimal)	AWS Servers	AWS Privacy Policy confirms no third parties are supplied with information without consent of ImproveWell LTD
Customer	Data Controller	Information related to quality improvement, including basic information about the App User	Personal Data (low risk, very minimal)	Out of scope for ImproveWell	Out of scope for ImproveWell LTD

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Initiative Description and Scope

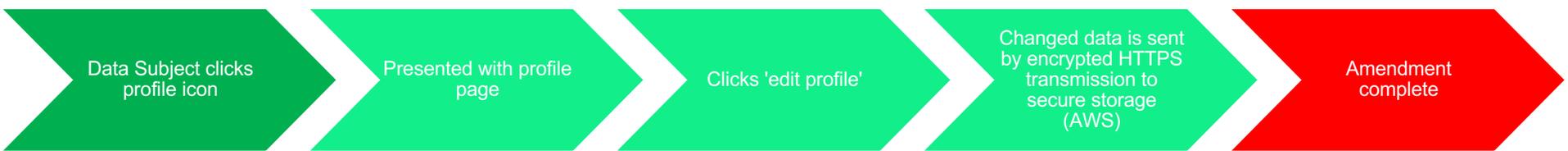
The ImproveWell platform has a smartphone application and data dashboard website with three core feedback systems. The App User is an employee who enters minimal Personal Data (largely by virtue of an email address and job title) into the App and submits (i) theme-based ideas for improvement; (ii) whether they have had a good day, sometimes with reasons why; and (iii) answers to surveys. These data are then used to manage quality improvement by the customer and for aggregated purposes by ImproveWell LTD.

Data Flow Maps

Registration and login



Amendment of Personal Data



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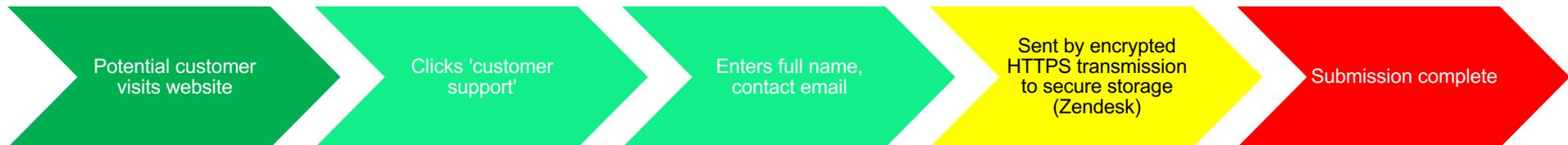
Customer demo request



Sales enquiry



Customer support enquiry



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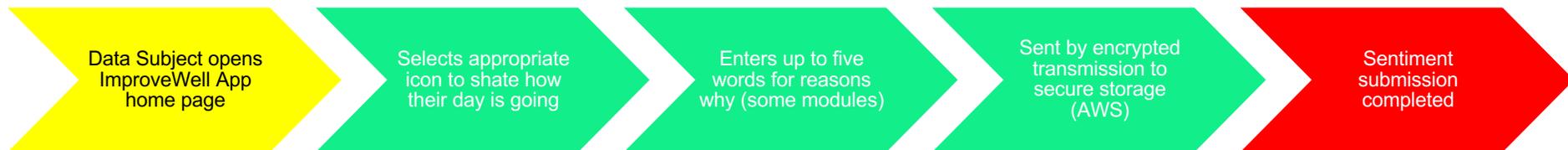
Feedback system 1: improvement idea submission



Message submission



Feedback system 2: sentiment submission



Feedback system 3: survey submission



Contractual / Sharing Chain

Party	Processing Activity	Contract / Agreement	Lawful Basis
App User (Data Subject)	Providing data within the App for various compatible purposes	Privacy Policy in place providing information about the various uses for the data and how the user may exercise their rights.	<p>DPA 2018 Schedule 9, Condition 1: The data subject has given his consent to the processing.</p> <p>GDPR 6(1)(a) – Consent of the data subject.</p> <p>CLDC Duty of confidence does arise due to presence of personal information. Set aside lawfully by virtue of informed consent which is deemed to be legitimate and proportionate. See Data minimisation (Appendix A).</p> <p>ECHR Art 8 Does represent a (minimal) interference. Lawfully interfered with by virtue of informed consent which is deemed to be legitimate and proportionate. See Data Minimisation (Appendix A).</p>
(ImproveWell LTD) Data Controller	Processing information entered by Data Subject in respect to identity, sentiment and improvement suggestions	Privacy Policy in place providing information about the various uses for the data and how the user may exercise their rights.	Processing is limited to that detailed in the privacy policy and in line with consent provided (GDPR Art 29).
AWS (Data Processor)	AWS provides Cloud storage for data generated by App users.	Data Processing Contract limiting further use of Personal Data to that which is specified by the Data Controller.	Processing is limited to that detailed in the privacy policy and in line with limitations placed by provided by virtue of Data Processing Contract. (GDPR Art 28 / DPA s 86 (1) (b)).

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Party	Processing Activity	Contract / Agreement	Lawful Basis
Various clients i.e. hospital trusts (Data Controller)	Reports of improvement information and sentiments entered by Data Subject. Includes identity and improvement suggestions	App Usage Agreement (DSA).	Processing is limited to that detailed in the privacy policy and in line with best practice agreed by virtue of Data Sharing Agreement (GDPR Art 29).
(ImproveWell LTD) Data Controller	Automatic collecting of technical and user data related to the device, use and location of the user	Privacy Policy in place providing information about the various uses for the data and how the user may exercise their rights.	Processing supports the legitimate interests of the Controller as described at Appendix D.

Data Protection Principles

<p>Fair, lawful and transparent processing</p>	<ul style="list-style-type: none"> • The ImproveWell App has a Privacy Policy in place that underpins the consent model for the user. • Privacy Policy informs users that transfer of data across the internet cannot be entirely secure (as per IGA Guidance). • Privacy Policy identifies the categories of personal information including technical information. • Privacy Policy identifies that it will share information with its partners such as the relevant organisation. • Privacy Policy confirms that ImproveWell LTD does not intend to collect health data via the “How I’m Feeling” sentiment function • Privacy Policy identifies both the primary function of the App as well as technical administration and improvement of the App itself. • Privacy Policy identifies how data subjects might exercise their rights to access of their data including possible charges. • Privacy Policy identifies how data subjects might exercise their rights to correction of inaccurate data. In addition, there is a facility within the App for the user to amend their profile.
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<p>Purpose limitation</p>	<ul style="list-style-type: none"> • Privacy Policy describes standard and potential uses for the data. • Clauses for the third-party storage provider include limitation of data use and the requirement to obtain permission from the data controller prior to any deviation. • Any changes to the project shall be subject to PIA development to ensure there is no 'mission creep' that could undermine lawful basis.
<p>Data Minimisation</p>	<ul style="list-style-type: none"> • A data minimisation exercise has been completed at Appendix A and the data collected appears to be the minimum required for the purpose.
<p>Accuracy</p>	<ul style="list-style-type: none"> • Data subjects can exercise their right to ensure personal data is accurate through the edit profile functionality. • Contact details are available within the privacy policy to request changes to Personal Data.
<p>Not held for longer than necessary</p>	<ul style="list-style-type: none"> • A retention schedule has been developed in 2018 as well as a method to put data 'out of use' on the request of the user.
<p>Rights and freedoms of data subjects</p>	<ul style="list-style-type: none"> • The Privacy Policy indicates that data could be used for direct marketing in the future and that data subjects will be notified. • The Privacy Policy provides contact details for a user to exercise their rights under privacy legislation. • ImproveWell LTD has developed a method for making data 'portable' under GDPR.
<p>Organisational and Technical security measures</p>	<ul style="list-style-type: none"> • A Privacy Impact Assessment has been completed. • Data Sharing Agreements / Contracts have been reviewed. • ImproveWell LTD has submitted an IG Toolkit for the 2018/19 year. • Initial registration / log in is two-factor and does not require specific validation of identity (name and password) due to low risk data set. • Passwords and data are encrypted at rest in the mySQL database. • Passwords and data are encrypted in transit. • App is not classified as a medical device via MHRA. • ImproveWell LTD has Information Governance resource available to support staff and technical development. • Contract with AWS for third party database includes:

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	<ul style="list-style-type: none">✓ Identification of Data Controller and Data Processor roles✓ Purpose and Use limitation✓ Confidentiality clauses✓ Staff training✓ Data Protection Policy✓ Business Continuity✓ UK and Ireland only Processing
Not transferred outside the EU	<ul style="list-style-type: none">• No data are transferred outside of the UK and Ireland.

Appendix A: Data Minimisation

Data Field No	Name of Field	What is the source of the data?	Use Category	Justification for use (explain why this field is required and how the project would be affected if not available)
1	Full name	Direct: Data subject enters into App	Core Service Delivery: Without this data, we would be unable to deliver the services that our customers commission.	Required in order to identify the individual to allow follow up within their organisation – such as engagement with roll out of related improvements.
2	Email address	Direct: Data subject enters into App	Core Service Delivery: Without this data, we would be unable to deliver the services that our customers commission.	Required in order to authenticate the individual as an employee of the customer organisation and to send alerts related to the user profile.
3	Password	Direct: Data subject enters into App	Core Service Delivery: Without this data, we would be unable to deliver the services that our customers commission.	Required in order to authenticate the individual as the appropriate user of the profile. Without it, Personal Data would be vulnerable to unauthorised access.
4	Job title	Direct: Data subject enters into App	Core Service Delivery: Without this data, we would be unable to deliver the services that our customers commission.	Required in order to identify the individual to allow follow up within their organisation – such as engagement with roll out of related improvements.
5	Sentiment	Direct: Data subject enters into App	Core Service Delivery: Without this data, we would be unable to deliver the services that our customers commission.	Required in order to allow the user to communicate job satisfaction / morale and for organisations to assess workforce sentiment. This is not a mandatory route for App engagement.
6	Type of Mobile Device Used	Indirectly: Collected when user accesses the App	Internal Product Development: Supports the legitimate interests of ImproveWell LTD as a commercial entity.	This information allows to ensure that our application functions correctly on all devices across our user base.
7	Mobile network information	Indirectly: Collected when user accesses the App	Internal Product Development: Supports the legitimate interests of ImproveWell LTD as a commercial entity.	This information allows us to understand the connection speeds which can impact user experience of the app.
8	Mobile operating system	Indirectly: Collected when user accesses the App	Internal Product Development: Supports the legitimate interests of ImproveWell LTD as a commercial entity.	This information provides context on the version of the operating system used across our user base so that we can ensure compatibility.
9	Type of mobile browser used	Indirectly: Collected when user	Internal Product Development: Supports the legitimate interests of ImproveWell LTD as a	This information tells us which browsers are used across our user base. Each browser behaves

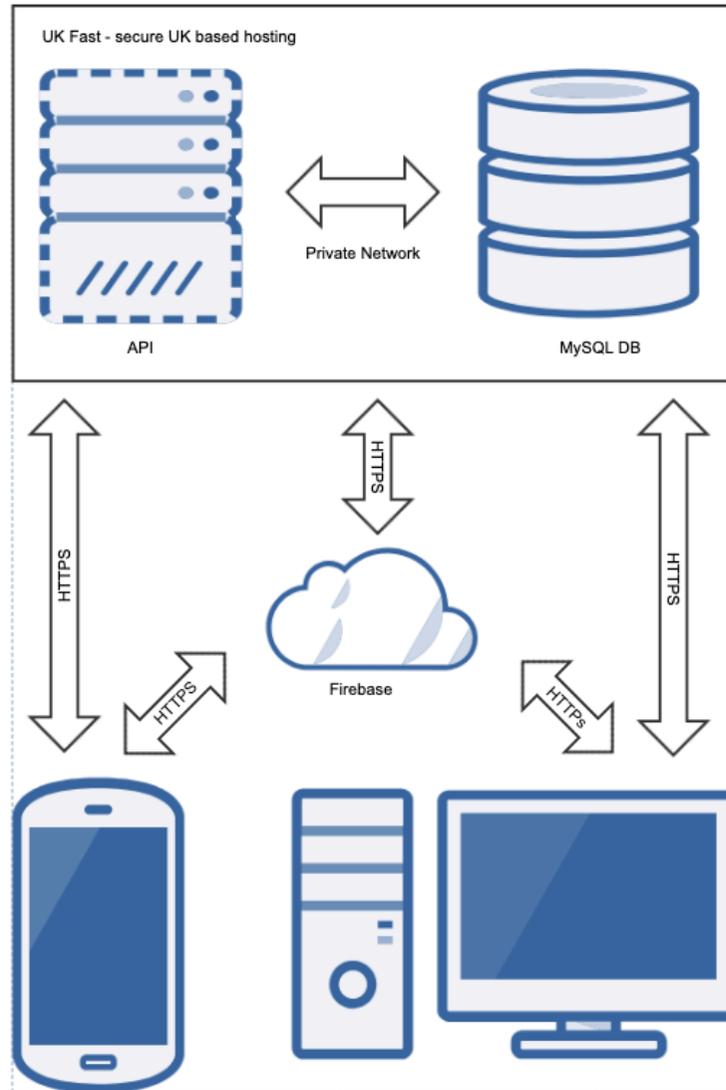
Data Field No	Name of Field	What is the source of the data?	Use Category	Justification for use (explain why this field is required and how the project would be affected if not available)
		accesses the App	commercial entity.	differently so can require additional work to ensure consistent functionality.
10	Time zone setting	Indirectly: Collected when user accesses the App	Internal Product Development: Supports the legitimate interests of ImproveWell LTD as a commercial entity.	This information provides context on the time of day that our app is being used within which can influence our product roadmap. For example, it allows us to understand when we should be pushing our notifications – such as privacy notice updates.
11	Geographic location information	Indirectly: Collected when user accesses the App	Internal Product Development: Supports the legitimate interests of ImproveWell LTD as a commercial entity.	This information provides context on where our application is being used and can influence features such as language translation.
12	Details of individual use of the App and the resources that are accessed	Indirectly: Collected when user accesses the App	Internal Product Development: Supports the legitimate interests of ImproveWell LTD as a commercial entity.	This information tells us which specific features of the App are being used the most and the least. It provides context on deciding which features to develop and prioritise.
13	Domain server (including IP Address)	Indirectly: Collected when user accesses the App	Internal Product Development: Supports the legitimate interests of ImproveWell LTD as a commercial entity.	Our data aggregators - such as Google Analytics - will hash the IP address to ensure that we are unable to identify particular individuals. This allows us to have a view of relevant information such as the country of users of our products. For the App, we require this information for security audit purposes to permit forensic analysis of access to the system.
14	Type of computer accessing the Site	Indirectly: Collected when user accesses the App	Internal Product Development: Supports the legitimate interests of ImproveWell LTD as a commercial entity.	Websites can be rendered differently across different devices. This information provides context on the devices accessing the site.
15	Type of web browser used to access the Site	Indirectly: Collected when user accesses the App	Internal Product Development: Supports the legitimate interests of ImproveWell LTD as a commercial entity.	Web browser behave in different ways so having information on which browsers access the site ensures we can present the best experience to all users.
16	Referring source which may have sent you to the	Indirectly: Collected when user accesses the App	Internal Product Development: Supports the legitimate interests of ImproveWell LTD as a commercial entity.	Referral sources tell us where our product is being talked about and allows us to understand the best place to focus marketing efforts to increase

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Data Field No	Name of Field	What is the source of the data?	Use Category	Justification for use (explain why this field is required and how the project would be affected if not available)
	Site			awareness of our product.
17	Other information associated with the interaction of your browser and the Site and cookies.	Indirectly: Collected when user accesses the App	Internal Product Development: Supports the legitimate interests of ImproveWell LTD as a commercial entity.	This information provides valuable analytics to ensure that the Site loads quickly and also tells which pages are of most interest to our users.

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Appendix B: System Diagram



Appendix C Brexit Impact Assessment

Context

This assessment is an addendum to the core Data Protection Impact Assessment for ImproveWell LTD. It serves to identify whether the impending exit of Britain from the European Union (Brexit) will have an impact on the rights and freedoms of data subjects using the ImproveWell platform and whether any alterations should be made to the technical and organisational measures in place to mitigate resulting risks.

GDPR Article 44 provides that any transfer of personal data which are undergoing processing or are intended for processing after transfer to a 'third country' are restricted and require satisfaction of particular Articles or derogations within the regulation in order to be lawful.

A third country is a country other than the EU member states and the three additional EEA countries (Norway, Iceland, and Liechtenstein) that have adopted a national law implementing the General Data Protection Regulation (GDPR).

Whilst Britain has implemented GDPR through the 2018 Data Protection Act, there has been no confirmation from Europe or 'adequacy decision' to formally recognise Britain's compliance with GDPR – such that satisfaction of the additional articles and derogations would not be required.

Consequently, upon exiting the European Union and pending an adequacy decision, Britain will become a 'third country' and any processing of personal data subject to GDPR must satisfy the necessary elements of Articles 45, 46, 47 or 49 to be lawful.

Assessment

ImproveWell LTD processes the following personal data:

Internal

- Applications are received and reviewed for recruitment purposes
- Employee data is processed to calculate and pay salaries
- Employee data is processed to calculate and pay pensions

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- Invoices and purchase orders are processed in order to produce accounts and pay taxes
- Records are compiled to maintain and develop the employment relationship
- Staff performance is monitored and appraised
- Criminal records are checked for new employees
- References are requested and provided for current and former staff members
- Response to a data subject (or representative) request related to access, amendment, restriction, objection re personal data

App provision

- App user downloads ImproveWell App and completes registration
- Data Subject logs into App
- User amends data through user profile
- User submits record of Sentiment in relation to employment
- Potential customer books product demo through ImproveWell website
- Personal data is transferred to third party for secure storage
- Customer will implement surveys / polls to gather innovation and to assess enjoyment of work
- Aggregated and Personal Data sent to customer to provide quality improvement data

Each of these will now be assessed to determine whether the restrictions apply, and which Article or derogation might legitimise the processing.

Processing Activity	GDPR Applicability			Conclusion / Notes / Actions
	Is organisation established in the EU?	Is organisation offering goods and services to data subjects in the EU?	Is organisation monitoring of data subject's behaviour within the EU?	
Applications are received and reviewed for recruitment purposes	No	No	No	No specific action is required to maintain data processing activity. There may be some circumstances where ImproveWell LTD is receiving applications from EU citizens. But this does not constitute 'providing goods and services'. ImproveWell LTD should simply continue to comply with GDPR.
Employee data is processed to calculate and pay salaries	No	No	No	No specific action is required to maintain data processing activity. There may be some circumstances where ImproveWell LTD is processing payroll for EU citizens (i.e. temp contracts etc) but this does not constitute 'providing goods and services'. ImproveWell

Processing Activity	GDPR Applicability			Conclusion / Notes / Actions
Employee data is processed to calculate and pay pensions	No	No	No	LTD should simply continue to comply with GDPR. No specific action is required to maintain data processing activity. There may be some circumstances where ImproveWell LTD is processing payroll for EU citizens (i.e. temp contracts etc) but this does not constitute 'providing goods and services'. ImproveWell LTD should simply continue to comply with GDPR.
Invoices and purchase orders are processed in order to produce accounts and pay taxes	No	No	No	No specific action is required to maintain data processing activity. There may be some circumstances where ImproveWell LTD is processing personal data for EU citizens (i.e. temp contracts etc) but this does not constitute 'providing goods and services'. ImproveWell LTD should simply continue to comply with GDPR.
Staff performance is monitored and appraised	No	No	No	No specific action is required to maintain data processing activity. There may be some circumstances where ImproveWell LTD is processing personal data for EU citizens (i.e. temp contracts etc) but this does not constitute 'providing goods and services'. ImproveWell LTD should simply continue to comply with GDPR.
Criminal records are checked for new employees	No	No	No	No specific action is required to maintain data processing activity. There may be some circumstances where ImproveWell LTD is processing personal data for EU citizens (i.e. temp contracts etc) but this does not constitute 'providing goods and services'. ImproveWell LTD should simply continue to comply with GDPR.
References are requested and provided for current and former staff members	No	No	No	No specific action is required to maintain data processing activity. There may be some circumstances where ImproveWell LTD is processing personal data for EU citizens (i.e. temp contracts etc) but this does not constitute 'providing goods and services'. ImproveWell LTD should simply continue to comply with GDPR.
Response to a data subject (or representative) request related to access, amendment, restriction, objection re personal data	No	No	No	No specific action is required to maintain data processing activity. There may be some circumstances where ImproveWell LTD is processing personal data for EU citizens (i.e. temp contracts etc) but this does not constitute 'providing goods and services'. ImproveWell LTD should simply continue to comply with GDPR.

Processing Activity	GDPR Applicability			Conclusion / Notes / Actions
	Is organisation established in the EU?	Is organisation offering goods and services to data subjects in the EU?	Is organisation monitoring of data subject's behaviour within the EU?	
App user downloads ImproveWell LTD App and completes registration	No	No	No	No specific action is required to maintain data processing activity. It is assumed that all customer employees are UK citizens. Where they are not, this does not constitute 'providing goods and services'. ImproveWell LTD should simply continue to comply with GDPR.
Data Subject logs into App	No	No	No	No specific action is required to maintain data processing activity. It is assumed that all customer employees are UK citizens. Where they are not, this does not constitute 'providing goods and services'. ImproveWell LTD should simply continue to comply with GDPR.
User amends data through user profile	No	No	No	No specific action is required to maintain data processing activity. It is assumed that all customer employees are UK citizens. Where they are not, this does not constitute 'providing goods and services'. ImproveWell LTD should simply continue to comply with GDPR.
User submits record of Sentiment in relation to employment	No	No	No	No specific action is required to maintain data processing activity. It is assumed that all customer employees are UK citizens. Where they are not, this does not constitute 'providing goods and services'. ImproveWell LTD should simply continue to comply with GDPR.
Potential customer books product demo through ImproveWell LTD website	No	No	No	At present, no specific action is required to maintain data processing activity as ImproveWell LTD is not specifically marketing their product to EU customers and at present materials are directed towards UK, USA and NZ. Where a demo is requested by a company in the EU, this does not constitute 'providing goods and services'. ImproveWell LTD should simply continue to comply with GDPR.
Customer will implement surveys / polls to gather innovation and to assess enjoyment of work	No	No	No	GDPR does not apply. It is assumed that all customer employees are UK citizens. Where they are not, this does not constitute 'providing goods and services'. ImproveWell LTD should simply continue to comply with GDPR.
Aggregated and Personal Data sent to customer to provide quality improvement data	No	No	No	GDPR does not apply. It is assumed that all customer employees are UK citizens. Where they are not, this does not constitute 'providing goods and services'. ImproveWell LTD should simply continue to comply with GDPR.

Conclusion

At present, there is no routine processing that would require satisfaction of any additional Articles or Derogations from GDPR in the event of a 'no deal' Brexit. Where there are exceptions such as processing of EU employee data, there are appropriate safeguards in place. These must be supported by information within the ImproveWell LTD privacy notice about the risks and the safeguards in place. It is therefore recommended that the following addition is placed into the ImproveWell LTD Main Privacy Notice:

Information for Data Subjects in the EU

In accordance with GDPR, your submission of your personal data to ImproveWell LTD constitutes your explicit consent to allow your personal data to be processed by ImproveWell LTD in the United Kingdom. The UK is not a member of the EU and GDPR does not directly apply. However, the UK has worked to implement GDPR and ImproveWell LTD has ensured that there are measures in place to protect your personal data and reduce the risk for EU data subjects. Please see, [How Does ImproveWell protect my information?](#)

It is also recommended that the following addition is placed into the ImproveWell LTD Employee / Candidate Privacy Notice:

Information for Data Subjects in the EU

As a data subject within the EU applying for or accepting a position with ImproveWell LTD, processing of your personal data will be in accordance with GDPR. The UK is not a member of the EU and GDPR does not directly apply. However, the UK has worked to implement GDPR and ImproveWell LTD has ensured that there are measures in place to protect your personal data and reduce the risk for EU data subjects. Please see, [How Does ImproveWell Protect My Information?](#)

Appendix D

Proportionality of Automatically Collected Data (Digital Fingerprint Data)

In accordance with ICO guidelines, below is an assessment of the proportionality and fairness of the automatic collection of device and user information from the ImproveWell App.

Whilst the lawful basis is consent, there is still a need to consider minimisation and to ensure that any data collected are necessary to achieve the stated purposes – that of the legitimate interests of ImproveWell LTD as a commercial entity.

ImproveWell LTD collects the following data sets indirectly from users of the ImproveWell App and uses them for the identified purposes below.

Data Field	Justification / Use	Strictly Necessary or internal legitimate interests	Consent (Cookie or Privacy Policy)
Mobile network information	Allows us to understand the connection speeds which can impact user experience of the App.	Internal legitimate interest	Privacy policy
Mobile operating system	Provides context on the version of the operating system used across our user base so that we can ensure compatibility.	Internal legitimate interest	Privacy policy
Type of mobile browser you use	Tells us which browsers are used across our user base. Each browser behaves differently so can require additional work to ensure consistent functionality.	Internal legitimate interest	Privacy policy
Time zone setting	Is used to improve performance of the mobile apps. This information provides context on the time of day that the App is being used within which can influence our product roadmap. For example, it allows us to understand when we should be sending our notifications – including any privacy policy updates	Internal legitimate interest	Privacy policy
Geographic location information	Is used to improve performance of the mobile apps. This information provides context on where our application is being used and can influence features such as language translation.	Internal legitimate interest	Privacy policy

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Data Field	Justification / Use	Strictly Necessary or internal legitimate interests	Consent (Cookie or Privacy Policy)
Details of your use of the App and the resources that you access	Is used to improve performance of the mobile apps. This information tells us which specific features of the App are being used the most and the least. It provides context on deciding which features to promote and prioritise.	Internal legitimate interest	Privacy policy
Domain server (including IP Address)	Our data aggregators - such as Google Analytics - will hash the IP address to ensure that we are unable to identify particular individuals. This allows us to have a view of relevant information such as the country of users of our products. For the App, we require this information for security audit purposes to permit forensic analysis of access to the system.	Internal legitimate interest for the Site. Strictly necessary for the App	Cookie policy for the Site. Privacy policy for the App.
Type of device / computer accessing the Site	Websites can be rendered differently across different devices. This information provides context on the devices accessing the Site.	Internal legitimate interest	Cookie policy
Type of web browser used to access the Site	Web browsers behave in different ways so having information on which browsers access the Site ensures we can present the best experience to all users.	Internal legitimate interest	Cookie policy
Referring source which may have sent you to the Site	The referral source tells us which other websites are directly traffic to the Site. For example, a link to our site shared on Twitter will appear here. Referral sources tell us where our product is being talked about and allows us to understand the best place to focus marketing efforts to increase awareness of our product.	Internal legitimate interest	Cookie policy
Other information associated with the interaction of your browser and the Site and cookies.	This information provides valuable analytics to ensure that the Site loads quickly and also tells which pages are of most interest to our users.	Internal legitimate interest	Cookie policy



What are the legitimate interests of the Controller?

The data sets are collected to allow ImproveWell LTD to review the devices and actions of its user base such that they are able to tailor and develop their products. For example, with regards to language translation based on geo-location, push notification timings based on time zone information and rendering and compatibility based on device and browser information.

Data protection legislation seeks to support digital innovation and using feedback and usage data for the purposes of maintaining service levels and product development is a legitimate aim for any conscientious technology company.

ImproveWell LTD has been sure to identify a purpose for all data collection that are related to either the delivery of the service or the development of its core product, such that data is not collected simply for the purposes of harvesting or unrelated activities.

What are the Reasonable Expectations of the Data Subject?

ImproveWell LTD currently has a Privacy Centre which is visible from each page of their website. It provides a wealth of very clear information and has been aligned with EDPB best practices guidelines. Under 'Information Collected Automatically' the data fields are listed, and the data subject is informed about what they are used for. On reflection, this assessment (May 20) has identified that the policy could go further and provide an explanation for the use of these data fields and the policy has since been updated.

The ICO also provides that consideration can be made about whether the technology is new or unanticipated. The data collected are fairly standard for most App providers who are seeking to develop and maintain their services in a similar way. The data is not shared with third parties, is not sensitive in nature and is not used in a way that is unusual or overtly detrimental to the individual.

Importantly, ImproveWell LTD does not access the data in a way that directly identifies the individual and do not link it to their user account data.

What Impact Does the Activity Have on the Rights of the Individual?

Since ImproveWell LTD does not access the data in a way that directly identifies the individual, no is it used for targeted advertising or other privacy intrusive activity, it is determined that the impact on the rights of the individual is negligible. Data subjects are free not to use the product or to raise objections in the usual way.

Conclusion

It is therefore concluded that the rights and freedoms of data subjects are not disproportionately interfered with and that, automatic collection of the data described is lawful, proportionate, transparent and fair.