

PRIVACY POLICY

Effective Date: **November 14, 2022**

PLEASE READ THIS AGREEMENT CAREFULLY BEFORE USING THIS STUDY SYSTEM.

This privacy policy (“**Privacy Policy**”) describes the collection and use of data from users of The University of Vermont and State Agricultural College (“**UVM**”) LEMURS App (“**Study App**”) and any UVM website or other UVM online service or application that posts a link to this Privacy Policy, as well as any features, widgets, plug-ins, content, downloads or other services that are offered through the Study App, or such other UVM online service or application (collectively, the “**Study System**”). LEMURS stands for “Lived Experience Measured Using Rings Study”. This Privacy Policy applies regardless of how you access or use the Study System, whether it be via computer, tablet, cellular device, smart watch, ring, console, or otherwise.

The Study App and Study System are owned and operated by UVM. By accessing and using the Study System you are indicating that you agree to and understand the collection and use of your information under this Privacy Policy and have read and understand the other terms and conditions of using the Study System described in the UVM LEMURS [Terms of Use](#) (the “**Terms of Use**”). If you do not agree to this Privacy Policy or the Terms of Use, please exit now and do not use the Study System.

INFORMATION WE COLLECT

When you interact with the Study System, UVM collects your information both actively and passively. UVM may actively collect information from you by specifically requesting that you submit information to the Study System, such as your full name, your e-mail address, your mailing address and your telephone number. You may also be given the opportunity to directly provide other personal information through the Study System, such as your date of birth, age, height, weight, gender, marital status, physical or mental health condition, occupation, area of study, wearable device data, or other health-related personal details (“**Personal Data**”). UVM also passively collects information from you when you interact with the Study System, such as details about your usage of the Study System and your browser, operating system, and hardware, as well as your IP address or other unique device identifier and your physical location. You should be aware that any health data that UVM collects in connection with the Study Systems is not protected by the Health Insurance Portability and Accountability Act (“**HIPAA**”) and any UVM HIPAA Notice of Privacy Practices does **not** apply to the collection of such information.

WHERE YOU MAY GIVE UVM INFORMATION DIRECTLY

We may request or otherwise give you the opportunity to directly share information in several ways during your interaction with the Study System. For instance, during registration with the LEMURS App, UVM may ask you to actively submit Personal Data, including your name, personal health and wellness information, your e-mail address and your class year. If you choose to register for a LEMURS account, you may also be given the opportunity to update certain aspects

of your account profile by adding more Personal Data such as your age, your date of birth, your weight, and your health and fitness habits.

AUTOMATED INFORMATION COLLECTION

At all times while you use or otherwise interact with the Study System, information may be automatically collected from you. UVM may collect this information using a variety of tracking technologies, such as cookies, web beacons, embedded scripts, browser fingerprinting, GPS, iBeacons, and ETags (or “entity tags”). A cookie (or “locally shared object”) is a data file placed on your device when you visit the Study System that keeps a record of your use of the Study System. This technology can make the Study System more convenient for users in many ways, including by keeping users logged in even when they close the LEMURS App, website, or other application, and remembering user preferences across separate visits. Your device, browser, or other software may allow you to reject or remove cookies, but if you do so, some features of the Study System may not work properly. This information can help track your participation in the study activities. Information (including Personal Data) collected (either automatically or directly from you) may be stored on your device and on UVM servers. With your consent, the Study System may also access other device data or applications such as a camera or health monitoring devices. All information and Personal Data may be stored and used by UVM in accordance with this Policy even if your account is deactivated, suspended or terminated or if you delete the LEMURS App from your device.

HOW UVM USES COLLECTED INFORMATION

UVM will not share any information collected on the Study System that identifies you personally without your consent except as otherwise explicitly described in this Privacy Policy. UVM may use the information collected from you, including Personal Data, to provide the Study System, process your registration, enable you to use certain features of the Study System, conduct scientific research, improve the Study System, develop marketing materials for the Study System, customize your use of the Study System, provide user support, or enforce the Terms of Use. In addition, UVM may use and share with third parties certain aggregated and/or de-identified data for a variety of purposes, including improving the Study System and furthering research and institutional knowledge. At no time will UVM sell your information, including Personal Data, to any third party without your express written consent. Information collected by UVM will be encrypted on your device and on UVM servers using commercially reasonable encryption measures.

WHEN UVM MAY SHARE INFORMATION WITH THIRD PARTIES

UVM may share collected Personal Data and/or other information about you with third parties where required by law, such as to satisfy any applicable law, regulation, subpoena, government request, or other legal process. UVM may also share your Personal Data or other information with third parties, including law enforcement, to protect the Study System and to enforce the Terms of Use. UVM also reserves the right to share your Personal Data or other information with its agents,

subsidiaries and affiliates, and with any subsequent owner in the event of a merger, consolidation, sale of assets or other change in institutional structure.

THIRD-PARTY SITES AND STUDY SYSTEM

The Study System may allow you to use your account from or otherwise link your UVM account with other online services, including social media providers. If you use or connect to accounts from other services on the Study System, those third parties may share personal or other information about you with UVM, and UVM may share personal or other information that it collects with them. Additionally, the Study System may include links to third-party websites or other online services. UVM is not responsible for these other sites and services, and they may collect and use Personal Data or other information about you. You should review the privacy policy of any website you visit carefully so that you understand how your information, personal or otherwise, is being collected and used.

THIRD-PARTY TRACKING AND DO NOT TRACK

Third parties may use tracking technologies in connection with the Study System, which may include the collection of information about your online activities over time and across different online platforms and devices. This Privacy Policy does not apply to these third-party tracking technologies because UVM may not control them and is not responsible for them. Do Not Track is a technology that enables users to opt out of tracking by websites they do not visit directly. Currently, UVM does not monitor or take any action with respect to Do Not Track technology.

UPDATING YOUR INFORMATION AND PREFERENCES

The Study System may allow you to update certain Personal Data and preferences by logging into your account and visiting your user information page. You may also request that UVM update or change your information by sending an email to lemurs.study@uvm.edu.

INTERNATIONAL USERS

If you are from a non-U.S. country or participating in the UVM LEMURS while studying or located abroad, please be aware that the personal information you submit, including information provided through the Study System, is being sent to a location in the United States. The data protection laws in the United States may differ from those of the country in which you are located, and your personal information may be subject to access requests from governments, courts, or law enforcement in the United States according to laws of the United States. By providing such personal information, you are consenting to (and represent that you have authority to consent to), the transfer of such information to the United States for the uses and purposes described in this Privacy Policy.

If you are from or are residing in the European Union or the United Kingdom, UVM adheres with the requirements of the General Data Protection Regulation 2016/679 (“**GDPR**”) with respect to its collection, processing and use of Personal Data. Information regarding UVM’s data collection

and processing practices and your rights under GDPR is located in our GDPR Privacy Notice for Students (“**GDPR Notice**”) located <https://www.uvm.edu/compliance/gdpr-notice>.

Please be aware that any request for withdrawal of consent as set forth in the GDPR Notice will not affect the lawfulness of personal information collected, processed, and transferred prior to the date of such withdrawal. If you wish to file a complaint related to the collection and/or processing of your personal data or exercise your rights under the GDPR, you may contact us as follows: Postal Mail: Office of International Education, The University of Vermont, 633 Main Street, Living/Learning Center, B-101, Burlington, VT, 05405 USA Attn: Chief Privacy Officer; By e-mail: privacy@uvm.edu.

CHILDREN’S PRIVACY

Our Study System is intended for general audiences, and UVM does not knowingly seek or collect personal information from children under the age of 18. In accordance with the Child Online Privacy Protection Act, in the event that UVM learns that the Study System has collected personal information from a child under age 13 without verification of parental consent, UVM will delete that information as quickly as possible. If you believe that UVM may have any personal information from or about a child, please contact UVM at privacy@uvm.edu.

CHANGES TO THIS PRIVACY POLICY

UVM may revise this Privacy Policy at any time without prior notice by updating this page, and such revisions will be effective upon posting to this page. Please check this Privacy Policy periodically for any changes. Your continued use of the Study System following the posting of any revisions to this Privacy Policy will mean you accept those changes. UVM reserves the right to alter, suspend or discontinue any aspect of this Study System, including your access to it. Unless explicitly stated, any new features will be subject to this Privacy Policy.

UVM may assign, novate or subcontract any or all of its rights and obligations under this Privacy Policy at any time.

DATA BREACH

UVM will take reasonable steps to secure your information and Personal Data. Unfortunately, however, no security system can be guaranteed to be entirely secure, and we do not control the data security practices of any third-parties. In the event of a data breach with respect to your Personal Data, UVM will notify you in accordance with its data breach notification policy located at http://www.uvm.edu/policies/general_html/databreach.pdf.

CONTACT US

If you have any questions or comments on this Study System or become aware of misuse of this Study System by any person, please contact UVM at lemurs.study@uvm.edu.

