MASH Native App Privacy Notice

MASH Native App is property of the University of Wisconsin-Madison. Your use of this program is governed by [UW-Madison's Privacy Notice](https://www.wisc.edu/privacy-notice/) (https://www.wisc.edu/privacy-notice/) as well as this supplemental notice. We value the privacy of the MASH Native App community and strive to protect individual privacy by:

- informing individuals about our practices
- collecting the minimum amount of personal data necessary for legitimate business purposes and legal compliance
- limiting access to personal data to appropriate individuals
- using appropriate physical and technical security measures to protect personal data
- integrating privacy principles in the design of projects that involve the use of personal data

This policy explains your choices about how we collect and use information about you. Your choices include controlling what information we collect about you and your use of MASH Native App, and how you can access and update your choices about what information we collect about you. In order to operate the Software and to maximize your experience of the Software, we may collect and use information, some of which may be considered personal data in your country. Please note that you can choose not to provide us with certain information or any information at all. Regardless of your opt-in choice, you can still use all of the functionalities provided by the Software.

1. Definitions
   1.1. In this notice, "personal data" is defined as any recorded information about you and from which you can be identified. It does not include data where your identity has been removed—anonymous data.   Personal data "processing" refers to anything that we do with that information—including collection, use, storage, disclosure, deletion or retention.
   1.2. "Software" refers to MASH Native App and related software used by MASH Native App to support scientific research.
   1.3. "We" and "us" refers to the University of Wisconsin-Madison, of which the MASH Native App is a part.
2. Types of personal data that MASH Native App collects:
   2.1. Information that you provide directly to us in connection with your use of MASH Native App, such as:
      2.1.1. Information that you provide when you download the Software
      2.1.2. Information you provide when contacting our customer support team, such as contact information, a summary of the problem you are experiencing, and any other documentation, screenshots, or information that would be helpful in resolving the issue
      2.1.3. Information that you provide to us through social media (Facebook, Twitter, etc.)
   2.2. Other information we collect

2.2.1. If you opt-in to collection of this information, we collect your IP address, information about app usage, date and time of events, and location information when you use the MASH Native App. We ask for your permission to collect this data so that we can compile aggregate data about app traffic and app interaction so that we can offer better experiences.

2.2.2. If you opt in to collection of this information, we also collect information about the file types you open, the deconvolution and search algorithms you run, and exceptions that occur during the use of the app. We do not collect the specific names of the files you open.

3. How we use your data

3.1. We use your information to resolve technical issues you encounter, to respond to your requests for assistance, and to repair and improve the Software.

3.2. For research and development related to the Software: We are continually looking for ways to improve the Software. We use information about how people use the Software and feedback provided directly to us to troubleshoot and to identify trends, usage, activity patterns and areas for integration and improvement of the Software. In some cases, we apply this information across the Software to improve and develop similar features or to better integrate the Software you use. We also test and analyze certain new features with some users before rolling out the feature out to all users.

3.3. To apply for additional funding: We can use the aggregate information provided to demonstrate usage and show utility of the product to the scientific community when applying for grant renewals or other funding opportunities.

3.4. To communicate with you: We use your contact information to send communications, including responding to your comments, questions and requests; providing customer support; and sending you technical notices, updates, security alerts, and administrative messages. You can easily opt-out of these communications by clicking the 'unsubscribe' link at the bottom of any e-mail you receive. We may provide tailored communications based on your activity and interactions with us. These communications are designed to help you become more proficient in using MASH Native App, and in most cases, you cannot opt out of them. If an opt out is available, you will find that option within the communication itself or in your account settings.

3.5. For scientific research purposes: The MASH Native App is intended to benefit the entire scientific research community and the public at large. Therefore, if you opt-in to allowing us to collect information described in 2.2.1 and 2.2.2 above, you grant the Board of Regents of the UW System, and their employees and agents, as well as their collaborators, permission to use such information in any way to further the goal of scientific research. We will do our best us to protect your data and your privacy to the extent that it does not impede scientific research.

4. How we share your data

4.1. Depending on your opt-in preferences, we use Google Analytics to obtain reports on location and time of the events described in 2.2.1 and 2.2.2, aggregate reports on the number of users and their location, aggregate reports

on the file types opened, and aggregate reports of the different processing algorithms run during usage of MASH Native App. We also will obtain aggregate data on the types of exceptions encountered during the usage of the application. For more information on Google Analytics, please visit [Google's website](#) along with [Google's Privacy Policy](#).

4.2. We may also share your personal data with third parties to comply with any legal obligation, or administer a contract you have with the university.

4.3. We may share aggregate reports with third parties conducting scientific research using our datasets.

4.4. We share information about you with third parties when you give us consent to do so. For example, we display personal testimonials of satisfied participants and supporters on our public websites. With your consent, we may post your name alongside the testimonial.

4.5. Other circumstances where we may need to share your personal data with third parties include when it is necessary to protect the health and safety of you or others.

4.6. Where your data is shared with third parties, we will seek to share only the necessary pertinent information.

4.7. We will share aggregate data about how the site is being used in publications, presentations, and grant applications. Reports generated from aggregate data include the locations of users that open the app, aggregate data about the file types that are opened, the deconvolution and search algorithms run.

5. How we secure and store your information

5.1. Depending upon your opt-in preferences, certain application events will be collected using Google Analytics in the United States, and we will download it to our physical servers in Madison, WI that we use to store data. We use technical measures and industry best practices to secure your data.

5.2. While we implement safeguards designed to protect your information, no security system is impenetrable and due to the inherent nature of the Internet, we cannot guarantee that data, during transmission through the Internet or while stored on our systems or otherwise in our care, is absolutely safe from intrusion by others.

5.3. If you opt-in and have events recorded by Google Analytics for the MASH Native App, these data will be retained for only as long as necessary for the purposes it was collected and processed. We also retain some of your information as necessary to comply with our legal obligations, to resolve disputes, to enforce our agreements, to support business operations, for research purposes, to continue to develop and improve our Software, and to comply with any applicable records retention schedules.

6. Other important information

6.1. Privacy Notice Updates

6.1.1. Updates to UW-Madison's privacy notice will be posted at that site; updates to this supplemental MASH Native App privacy notice will be posted on the MASH website. We may change this privacy policy from time to time. We will post any MASH Native App privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice by

adding a notice on our homepages, startup screens, or by sending you an email notification. We encourage you to review our privacy policy often to stay informed about our information practices and the ways you can help protect your privacy.

6.1.2. If you disagree with any changes to this privacy policy, you will need to stop using our Software.

GDPR Privacy Notice
NOTICE SPECIFIC TO PERSONS WITHIN THE EUROPEAN UNION (EU) AND/OR THE EUROPEAN ECONOMIC AREA (EEA)
If you are located in the EU or EEA, then our processing of your personal data may be subject to the [General Data Protection Regulation, or the "GDPR")](#). GDPR is a data privacy law that applies to personal data collected in or from the EU or EEA. MASH Native App is part of the University of Wisconsin-Madison. Your use of this website is governed by [UW-Madison's GDPR Privacy Notice (](#)https://www.wisc.edu/privacy-notice/gdpr-notice/) as well as this supplemental notice, which outlines the collection, use, and disclosure of personal data provided to MASH Native App by individual users of MASH Native App while located in the EU and/or the EEA.
When you submit information to MASH Native App or use MASH Native App's websites and/or other electronic Software, you consent to the collection, use, and disclosure of that information as described in this Privacy Notice. Please also see our GDPR resources webpage for more information. [https://it.wisc.edu/about/division-of-information-technology/strategic-operations-departments-people/cybersecurity/general-data-protection-regulation-gdpr/](#)
Where GDPR applies, we do not knowingly collect personal data from children under age 16 (or such lower age permitted under applicable local law not being lower than 13).

1. PERSONAL DATA COLLECTED

   We collect information that you provide directly to us in connection with your use of MASH Native App, such as:
   - 1.1.1. Information that you provide when you download the Software
   - 1.1.2. Information you provide when contacting our customer support team, such as contact information, a summary of the problem you are experiencing, and any other documentation, screenshots, or information that would be helpful in resolving the issue
   - 1.1.3. Information that you provide to us through social media (Facebook, Twitter, etc.)

   With your consent, if you opt-in to collection of such data, we collect personal data from users of the MASH Native App program such as app usage, date and time of events, and location information. Additional information we can collect about you are the file types you open, the deconvolution and search algorithms you run, and exceptions that occur during the use of the app. We do not collect the specific names of the files you open. The amount of personal data we collect is determined by you and is used to respond to your inquiries and to conduct analytics to maintain and improve our application.

The legal basis for this type of data use includes: (1) facilitating transactions requested by you and to meet our contractual obligations, e.g., enabling you to use MASH Native App according to its terms of use; (2) UW-Madison's legitimate interests (such as analytics); (3) complying with a legal obligation; and (4) your consent, where applicable.

2. HOW WE USE PERSONAL DATA

We use personal data in a variety of ways including those identified above. Below is a summary of the different purposes for which we use your personal data that includes the uses above as well as some additional uses. Under certain circumstances, these additional uses may be based on your consent, or may be necessary to fulfill our contractual commitments to you, for legal compliance, or to serve our legitimate interest in the following operations:

- Responding to your requests or inquiries
- Carrying out our business operations: Acquiring feedback through research, surveys and similar inquiries to increase our understanding of trends and needs individuals using the Software
- Compiling statistics and conducting research for internal and external reporting purposes
- Preventing, investigating, and addressing fraud, unlawful or criminal activity, other misconduct, security or technical issues, or unauthorized access to or use of personal data, our website or data systems
- Meeting legal obligations including responding to subpoenas, court orders, or other legal process, enforcing our agreements, and protecting the health, safety, rights or property of you, the university, and others
- Providing communications, announcements, and other information that may be of interest to you
- Publishing and presenting information about MASH Native, and applying for funding to further the development of MASH Native
- Engaging analytics to prepare marketing, promotions and advertising, either directly or through third parties, that may be of interest to you

3. LEGAL BASES FOR PROCESSING—LEGITIMATE INTERESTS

Under GDPR, there are several legal bases on which data is processed at UW-Madison. As noted above, this may include your consent, where it is necessary for entering into or for the performance of a contract, or where it is necessary for the university's legitimate interests. Below are several legitimate interests on which the university relies in using and sharing your personal data:

Under certain circumstances, these additional uses may be based on your consent, or may be necessary to fulfill our contractual commitments to you, for legal compliance, or to serve our legitimate interest in the following operations:

- Furthering research and understanding in fields of academic study
- Conducting and growing the university's operations
- Ensuring the safety and security of members of the campus community

- Meeting the university's institutional obligations and enforcing our legal rights
- Evaluating and improving our online platforms and user experience
- Protecting against fraud, spam, harassment, intellectual property infringement, crime and security risks
- Cybersecurity

4. YOUR RIGHTS

In light of UW-Madison's data processing activities that are subject to GDPR, UW-Madison strives to facilitate the exercise of the rights granted to you by GDPR in a timely manner. This includes ensuring the

- Rights to confirm, access, correct and other requests— You have the right to obtain information about the personal data we process about you as well as a copy of the data. Additionally, and under certain circumstances, you may have the right to correct or update any of your personal data that is inaccurate, to request the deletion of your personal data, to restrict or limit the ways in which we use your data, and to request transfer of your personal data to another party. Upon a reasonable, good faith request, we will provide you with information about whether we hold any of your personal data as part of our EU/EEA processing activities to the extent required by and in accordance with applicable law.
- Right to object—You have the right to follow opt-out instructions and to object to any processing of your personal data based on your specific situation. In the latter case, we will assess your request and provide a reply in a timely manner according to our legal obligations.
- Right to withdraw consent—You have the right to withdraw your consent at any time for all data processing operations that are consent-based and we will stop those processing operations subject to certain legal limitations. In some cases, you can do this by discontinuing use of the Software involved in the EU/EEA processing activities. This may include closing all of your online accounts with the university and contacting us at gdpr-program@wisc.edu to request that your personal data be deleted. If you withdraw your consent to the use or sharing of your personal data for the purposes described in this or other UW-Madison privacy statements that link to or expressly adopt this privacy notice, you may not have access to the related Software, and we might not be able to provide you all (or any) of the Software.

Note: In certain cases, we may continue to process your personal data after you have withdrawn consent and requested that we delete your personal data if there is a legal basis to do so. For example, we may retain certain data if we need to do so to comply with a legal obligation, if we still need the data for the lawful purposes for which we obtained the data, or if it is necessary to do so to pursue our legitimate interest in keeping our Software and operations safe and secure.

When you make requests based on the rights listed above, you may be asked for further personal information to confirm your identity and used solely for the purposes of responding to your request.

5. RETENTION PERIOD

Personal data in is kept on record at UW-Madison only as long as necessary for the purposes it was collected and processed. The disposition of your information is subject to the retention periods of applicable state and federal law. Retention periods vary and are established considering our legitimate interests and all applicable legal requirements. If you consented to the use of your information, you have the right to withdraw consent without affecting the university's lawful use of the information prior to receiving your request to withdraw consent. Please see university record retention schedules and disposition at https://www.library.wisc.edu/archives/records-management/retention-disposition/

6. INTERNATIONAL DATA TRANSFERS

When you interact with MASH Native App either directly or through a third party, your personal information is transferred to the United States. The United States currently is not deemed by the European Commission to have an adequate level of legal protections for personal data information. UW-Madison relies on appropriate or suitable safeguards or specific derogations recognized under data protection laws including the GDPR. In particular, we rely on your explicit consent for some of the data transfers and on necessity for the performance of a contract or the implementation of pre-contractual measures taken at your request (e.g., for the transfer of personal data necessary for you to use the MASH Native App Software in accordance with MASH Native App's terms of use). We may also use Standard Contractual Clauses specifically adopted by the European Commission to provide safeguards for personal data transferred outside of the EU/EEA.

7. NOTICE UPDATES

Updates to UW-Madison's GDPR privacy notice will be posted at that site; updates to this supplemental MASH Native App privacy website will be posted here. Please check the date our statement was last updated at the top of this page.

8. CONCERNS

If you have any concerns or questions regarding your personal data use, please contact gdpr-program@wisc.edu. We will respond to your request in a timely manner and will do our best to address your concern. However, if you believe we have not been able to deal with your concern appropriately, you have a right to complain to your local data protection authority, as granted by Article 77 of GDPR. You also have the right to submit a complaint in the EU/EEA Member State of your residence, place of work or of an alleged infringement of GDPR.