

## General Data Protection Regulation Policy Change



### Make sure you are GDPR compliant.

General Data Protection Regulation (GDPR) comes into force on the 24th May 2018, and with less than 12 months to go many companies seem content with debating the impacts of the regulation and discussing how their customers might deal with the changes, but few seem to have focused on actually providing their customers with a compliant service.

As you would expect, here at Purple we've taken the proactive step of making the changes early so our customers can benefit from having one less GDPR headache to deal with, as well as giving end users the confidence that their data is being looked after.

We've created our Profile Portal, which you can learn more about [here](#), and we've also made some significant changes to our policies to make sure you are fully protected.

## Access journey

One of the key terms to come from GDPR is the idea of “unambiguous consent”. What this means is that when a user agrees to a Privacy Policy, or Terms and Conditions, they are aware of what they are agreeing to, and they have clearly agreed to the principles of what data a company will collect and what they will do with that data. In order to attain this “unambiguous consent” we have made a number of changes to the access journey.

When a customer ticks the consent box on the WiFi splash page, they will be presented with a further screen that provides a “Terms Overview”. This screen provides 2 tabs which then break down information on the data that is collected (Your data) and how the data is used for marketing purposes (Marketing).

## Your data

Terms overview

<a href="#">Your data</a>	<a href="#">Marketing</a>	<a href="#">Location</a>
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After logging in, we will email you a link that will allow you to see what data we hold on you and manage your preferences.

We collect personal information when you use the WiFi, as well as information on the device you are using and how you use the WiFi. The owner of the venue you are visiting will also have access to this data.

For more information on the data we collect and how we use it, please see our [Privacy Policy](#)

I agree to Purple Master Whitelabel's [Terms and Conditions](#) and [Privacy Policy](#)

Agree to receive marketing material and SMS?

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CANCEL[ACCEPT TERMS](#)

## Marketing

Terms overview

[Your data](#)   **Marketing**   [Location](#)

The data you provide us may be used by the owner of the venue you are visiting in order to communicate marketing messages and offers to you via email and SMS. By signing up to the WiFi you agree to be contacted by them and us.

After logging in, we will email you a link that will allow you to update your marketing preferences to disable these marketing messages.

I agree to Purple Master Whitelabel's [Terms and Conditions](#) and [Privacy Policy](#)

Agree to receive marketing material and SMS?

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[CANCEL](#)   [ACCEPT TERMS](#)

## Location

If the venue has a Location license, the user will also be presented with a third tab (Location) which explains how and why location is tracked and collected.

Terms overview

[Your data](#)   [Marketing](#)   **Location**

If Location is enabled, we collect information on how devices move around the venue.

The owner of the venue will have access to this information in order to better understand how visitors are using the venue.

I agree to Purple Master Whitelabel's [Terms and Conditions](#) and [Privacy Policy](#)

Agree to receive marketing material and SMS?

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[CANCEL](#)   [ACCEPT TERMS](#)

The user can then Accept Terms based on this additional information and thus provide “unambiguous consent”. If the user requires further clarification before accepting, they can look at our revised Privacy Policy.



## Privacy Policy

Many Privacy Policies are lengthy and often designed as a legal document, which results in them being difficult to understand and often ignored. Many users will blindly agree to terms and conditions rather than take the time to read through them.

In response to this, we've shortened our own Privacy Policy from 1600 words to 260 words, and made it very easy to understand. We've used the type of language that people use in their everyday life. Our hope is that when a user is presented with the Privacy Policy it is clear enough for them to be confident in the knowledge of what data we collect, why we collect it and what we do with the data.

### Privacy Policy

#### Information that we collect

1. Submitted Information: the information you provide when you login, such as social media account or details provided on a form.
2. Additional Information: the information of the websites you visit, the transactions you make and responses to any of the surveys we send to you. We do not collect any information used to make financial transactions.
3. Device Information: information about the device (mobile phone, tablet, laptop etc) you are using.
4. Location Information: If Location is enabled, we collect information on where in the venue you have been.
5. Network Information: We collect information from your device on the IP addresses, internet service providers, clickstream data, browser type, language, viewed and exit pages, and date and time stamps.

#### Cookies

We use Cookies like a website would; to enable us to distinguish you from other users.

#### How we store your data

Data is stored on our own secure servers in accordance with local regulations for 13 months.

#### How your data is used

Your data may be used to understand how you use a particular venue, to communicate with you or to offer you relevant goods and services.

#### Who may use your data

Your data may be used by Purple, the owner of the venue you visited or selected third parties.

Your data may also be provided to regulatory bodies where we are under a legal obligation to do this, to protect our own rights or if we feel someone's safety is at risk.

#### Accessing your own data

You can access and amend the data we hold on you at any time by visiting your Profile Portal