

# EASE App Privacy Policy

Last updated: 23/04/2026

## 1. Introduction

This Privacy Policy explains how personal data is handled when you use the EASE mobile application (“the App”).

EASE is designed to support disabled people in employment by providing access to wellbeing tools, resources, and support that help users stay well and succeed at work.

We are committed to protecting your privacy and ensuring that the App is safe, trustworthy and respectful of your autonomy.

This policy applies only to use of the EASE App, not to the SUSE website or other SUSE services.

## 2. Who We Are

The EASE App is operated by Scottish Union of Supported Employment (SUSE) (“we”, “us”, or “our”).

For the purposes of UK data protection law, SUSE is the data controller in relation to the App.

If you have any questions about this policy or how your data is used, you can contact us at:

**Scottish Union of Supported Employment**  
**1 Neasham Drive, Kirkintilloch, G66 3FA**  
**[ease@susescotland.scot](mailto:ease@susescotland.scot)**

## 3. Our Core Privacy Principles

EASE is built around the following principles:

- Your identity is private to you
- Your employer cannot see your data
- App developers and staff cannot access your personal identity
- We collect the minimum data needed
- We use anonymous data to improve the app, not to monitor individuals.

## 4. Your Identity and Contact Information

Your name and contact details (such as email address) are:

- Private to you
- Not visible to other users
- Not accessible to app developers
- Not accessible to SUSE staff in an identifiable form
- Not shared with employers, partners, or external organisations

EASE is designed so that individual users cannot be personally identified through app data used for analysis, reporting, or improvement.

## 5. What Personal Data We Collect

### 5.1 Personal data you provide

Depending on how you use the App, you may provide:

- A name or display name
- An email address (for account access or support)
- General location (Local Authority area only)
- Disability
- Gender
- Ethnicity
- Parent/Carer status
- Wellbeing check-ins or ratings
- Optional responses within app features

This information is used only to provide the App's functionality to you.

### 5.2 Data we do not collect

We **do not** collect:

- Your employer's name or access credentials
- Your job title
- Continuous location data
- Medical records or diagnoses
- Audio, camera, or background activity data

### 5.3 Special category data

Some of the information you provide, such as disability and ethnicity, is considered special category data under the UK GDPR.

We collect this information only:

- With your explicit consent
- To personalise your experience
- To improve the relevance and accessibility of support provided

You can choose not to provide this information.

## 6. Anonymous and Aggregated Data

To understand how EASE is used and how it can be improved, we collect anonymous and aggregated data only.

This data:

- Does not identify you
- Cannot be traced back to an individual
- Is always analysed across groups of users

Examples include:

- General location such as local authority area (not postcode or address)
- Number of active users
- Average wellbeing scores across groups of users
- Common patterns in app categories or resources accessed
- Overall feature usage and trends

This data helps us:

- Improve the App
- Identify gaps in support
- Demonstrate impact at a population level
- Ensure EASE meets the needs of disabled people in work

## 7. Who Can and Cannot See Your Data

### 7.1 Employers

- Employers cannot access EASE data
- No data is shared with employers about individual users

## 7.2 SUSE staff and app developers

- Do not have access to identifiable user data
- Only use anonymised, aggregated information for app improvement

## 7.3 Other organisations

We do not sell, rent, or trade user data.

Anonymous, aggregated insights may be shared:

- In reports
- For funding or evaluation purposes
- With partners supporting the development of EASE

These insights never identify individuals.

## 8. How We Use Your Data (Lawful Basis)

Under the UK GDPR, we rely on the following lawful bases:

- **Performance of a contract** – to provide the App's features
- **Consent** – where you choose to provide optional information
- **Legitimate interests** – to improve EASE using anonymised data, without overriding your rights or freedoms

You can withdraw consent at any time where it applies.

## 9. Third-Party Services

We do not use advertising in the app.

We use trusted third-party services to send notifications and support app functionality. These services only process the data needed to provide their features and must keep it secure.

These include:

- Google Firebase Cloud Messaging (FCM) (by Google)  
Used to send notifications to your device
- Expo Push Notifications  
Used to manage and deliver notifications within the app

These services may use limited technical information, such as a device token, to deliver notifications.

We do not use these services to track you or show advertising.

You can control notifications in your device settings at any time.

## 10. Data Security

We use appropriate technical and organisational measures to protect your data, including:

- Secure storage
- Access controls
- Use of anonymisation where possible

We regularly review security practices to keep data safe.

## 11. How Long We Keep Data

- Account-related personal data is kept only for as long as you have an active account, or as required by law
- Anonymous and aggregated data may be retained longer for research and reporting purposes.

## 12. Your Rights

Under UK data protection law, you have the right to:

- Access your personal data
- Request correction of inaccurate data – you can do this through the Profile edit function in the app. App developers do not have access to your personal data to make updates to incorrect information e.g. name or email address.
- Request deletion of your account and personal data
- Restrict or object to certain processing
- Withdraw consent (where applicable)
- Make a complaint to the Information Commissioner's Office (ICO)

To exercise your rights, contact:

**Scottish Union of Supported Employment**  
**1 Neasham Drive, Kirkintilloch, G66 3FA**  
**ease@susescotland.scot**

### **13. Account Deletion**

You can request deletion of your account:

- By contacting us at [ease@susescotland.scot](mailto:ease@susescotland.scot)

We will delete your personal data within one calendar month.

### **14. Changes to This Policy**

We may update this policy from time to time.

If changes are significant, we will notify users through the App.