

# Privacy Statement for the Dilemma Game App

This privacy statement concerns the Dilemma Game app and applies to the processing of personal data belonging to users who have downloaded and installed the app, hereafter referred to as the "User" or "you". This privacy statement provides information regarding the processing of personal data by the Erasmus University Rotterdam, located in Burgemeester Oudlaan 50, Rotterdam, hereafter referred to as the "EUR" or "us".

In this privacy statement, we explain who we are, how and for what purposes we process your personal data. We also explain how you can exercise your rights under the GDPR, including further information that may be relevant for you. The privacy statement may be updated and amended, due a change in processing or legal obligation. This most recent version of the privacy statement will always be found on the Dilemma Game App and on the Dilemma Game webpage. We therefore recommend that you consult the privacy statement on a regular basis. This privacy statement applies starting from the 13<sup>th</sup> of May 2020.

## What is the Dilemma Game?

The Dilemma Game is an app meant to help foster awareness of integrity dilemmas and stimulate an open and critical discussion of integrity and professionalism in research. The game consists of dilemmas with four possible courses of action from which the player can choose. By defending and discussing these choices in critical dialogue, the game supports researchers in further developing their moral compass. In addition to creating an environment for critical dialogue, the Dilemma Game can provide real-time (aggregated) statistics that reflect how the community of researchers respond to particular dilemmas and the choices they make. The Dilemma Game is freely available for all researchers.

The Dilemma Game has been developed at Erasmus University Rotterdam by the department for IT Development and Academic Affairs.

## 1. Purpose(s) of processing

Account registration – When you download the Dilemma Game app, you will be asked to register your account. For this purpose, we will simply ask you to provide a username (referred to as a 'nickname' within the app). Once you have chosen a nickname, the app will automatically generate a randomized token (a device ID) that is unique to your local device and nickname. After you have registered your account, you will be able to view the dilemmas individually, propose a dilemma, and participate in the dialogue when using the group or lecture modes (hereafter referred to as the "Service").

The legal basis for this processing activity is your consent.

To provide our Service – Once you have registered your account and device, you will be able to access our Service. Once you have access, you will have access to the following functionalities:

- i. *Individual mode*: Play the Dilemma Game on your own by going through the already available dilemmas. The individual mode keeps track of your dilemma choices and compares them to the (aggregated) community statistics. The record of your dilemma choices are accessible by you and only you;

- ii. *Group mode*: Go through pre-selected dilemmas in a small group setting, participating in a dialogue to defend and discuss the choices made by the group and yourself. This mode will generate statistics of the group's results which is viewable for all the members within that group;
- iii. *Lecture mode*: Discuss a pre-determined set of dilemmas in a larger (lecture) group setting. One user account belonging to the 'lecturer' will determine the dilemmas up for discussion. Other users invited to this lecture-setting may make their choices in response to these dilemmas and foster a critical discussion in a larger setting. This mode includes the generation of statistics reflecting the choices made by the participants;
- iv. *Propose new dilemmas*: Once registered with the Dilemma Game, any user may propose a new dilemma. The ethical dilemmas in the context of research are always developing and discussions may lead to more questions that are not addressed in the existing dilemma database. Proposing a new dilemma will include it in our database and will not be linked to the user account through which it was submitted.

For these purposes, we do not process any additional personal data other than what was required for the registration of your account and device. The appropriate legal basis for the provision of our Services is consent, which was provided at the time of account registration.

To communicate with you – When you contact the EUR through the contact details provided below (e.g. in the context of support or filing a complaint), we will need to process additional personal data to facilitate and process your request. This includes your name, contact information (e-mail address), information that you provide through your e-mail signature (such as title and organization), and content of your message. Once your request has been resolved, we will delete all personal data belonging to you that was collected and processed in the context of your communication with us.

The legal basis for our communication with you in response to a request for support is our legitimate interest. Our legitimate interest is to ensure that Dilemma Game works as intended for all of our users.

If your request concerns the exercise of your right to erasure, the EUR has a legal obligation to comply and carry it out. For more information on how to exercise your rights under the GDPR, please refer to Section 5.

## 2. Third parties and data processors

Erasmus University has not contracted with any third parties, including data processors. Your personal data will not be leased, sold, shared, or otherwise made accessible to third parties. Access is strictly limited to our developers and administrators for the purpose of improving and further developing the application.

For the purposes of the Dilemma Game, the EUR is the data controller and anybody else engaging with the app is considered to be a user.

In the context of the group or lecture modes, access to information on how a particular user responds to a dilemma is limited to the other users within that group or lecture environment. Depending on the size of the group, users within that group may potentially link your nickname with your particular dilemma choices.

### 3. Security

The EUR takes the security of your personal data seriously and treats it as confidential. To that end, the EUR has taken appropriate technical and organizational measures to protect the personal data. Our security measures have taken account of the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk for the rights and freedoms for our users. For more information, you can reach us using the contact details provided below.

### 4. Data Retention

The EUR does not store your personal data for no longer than strictly necessary. The EUR will store your nickname, token, and individual statistics (generated from your dilemma choices) for as long as you continue to have the app installed on your device. Once you uninstall the app, the EUR will retain the dilemma choices associated with your nickname although these results will be aggregated into the Dilemma Game's overall statistics. The deletion of your account includes the deletion of the token associated with your particular device, thereby removing any possible link that can be used to identify you.

Personal data that we process in the context of our communication with you are stored until we have been able to resolve your request. Once your request has been resolved, the personal data not relating to your use of the Dilemma Game will be deleted.

### 5. Data Subject Rights

The GDPR provides every data subject with rights, ensuring effective control over their personal data. This includes the withdrawal of the consent, the legal basis we rely on for the processing of your personal data. In the context of the Dilemma Game, we will facilitate the exercise of the following rights:

- i. *Right to access* – If you have the Dilemma Game installed on your device, you will always have access to the personal data processed by us. This includes your [username] and your own dilemma results (including the statistics thereof);
- ii. *Right to erasure* – To exercise your right of erasure, simply uninstall the Dilemma Game from your device. The EUR will retain the dilemma choices associated with your nickname although these results will be aggregated into the Dilemma Game's overall statistics. The deletion of your account includes the deletion of the token associated with your particular device, thereby removing any possible link that can be used to identify you.

The GDPR requires that consent must be able to be withdrawn as easily as it was given. The deletion of the Dilemma Game from your device will constitute, and give immediate effect, to your withdrawal of consent. Keep in mind that while this means that your token (unique device ID) is deleted, your nickname may still be stored in our system. Without the token, it is not possible for us link the username to you or your device.

If you wish to exercise your right to erasure, we require proof to verify that the account actually belongs to you and not another user. Prior to deleting the Dilemma Game from your device, we require a screenshot from your device. The screenshot should include the nickname associated with your

account, which can be found in the "Preferences" section within the app. To exercise this right, we ask that you send an e-mail using the contact information below in which you clearly state that you are exercising your right to erasure and have the aforementioned screenshot attached.

## 6. Complaints?

In the event that you wish to file a complaint, you can reach us through the contact information provided below. You also have the right to submit a complaint concerning the use of your personal data to the Dutch Data Protection Authority (Autoriteit Persoonsgegevens).

## 7. Contact information

The Dilemma Game team can be reached via:

E-mail: [dilemmagame@eur.nl](mailto:dilemmagame@eur.nl)

Post: Academic Affairs, Burgemeester Oudlaan 50, 3062 PA Rotterdam, Netherlands

In addition, specific questions regarding privacy or data protection can be directed to our Data protection Officer at Erasmus University Rotterdam. He can be reached via [fg@eur.nl](mailto:fg@eur.nl).