

Privacy Notice – UHI Research study “Assessing the usability and adherence to wearable technology and the RADAR-base platform in online home-based exercise (pilot study)”

The Data Controller of the information being collected is: The University of the Highlands and Islands (UHI), Executive Office, 12B Ness Walk, Inverness IV3 5SQ. phone: 01463 279000

For any questions about the research project please contact the Principal Investigator: Dr Daniel Crabtree Daniel.crabtree@uhi.ac.uk

For any queries or concerns about how your personal data is being processed you can contact the relevant Data Protection Officer at dataprotectionofficer@uhi.ac.uk

This privacy statement relates to the following process:

UHI Research study “Assessing the usability and adherence to wearable technology and the RADAR-base platform in online home-based exercise (pilot study)”

Your information will be used for the following purposes:

Control group: The control group will continue with their usual physical activity during the 6 week research period and will be offered the opportunity to participate in High Life Highland (HLH) online exercise classes twice a week for 6 weeks, after they have finished the 6 week research period. Those control group participants who elect to participate in the online exercise classes, will have their data processed by HLH as described in this notice.

Experimental group: The experimental group participants will participate in HLH online exercise classes twice a week for 6 weeks and will have their data processed by HLH as described in this notice.

Purpose 1: Collection and analysis of research data	Physical inactivity is one of the leading causes of mortality and chronic health conditions globally. There are several barriers to physical activity especially within individuals living in remote and rural areas. One such method to overcoming these barriers maybe through face-to-face delivery of online exercise classes conducted at the home. Previous research on home-based physical activity programmes have found that participant adherence is low. The use of wearable technology and a developed digital platform to store and analyse data is a new approach to increase adherence and uptake of physical activity which requires investigation. The study aims to collect feedback on the online exercise classes, wearable technology and a digital platform to inform future research. As part of this study, you will be required to wear a Fitbit device and sign up for Fitbits terms of service.
---	--

Purpose 2: Collection of focus group research data and recording	Following the end of the 6-weeks you will be invited to attend a focus group that will be conducted on Microsoft Teams with other participants in the study, to discuss your experience of the intervention. The focus group will be audio recorded using Microsoft Teams. The focus group will last approximately 1 hour. The focus group will consist of questions regarding your experience, enjoyment, attitudes and any feedback you wish to give around any element of the study.
Purpose 3: Delivery of exercise class research intervention	The online exercise classes will be delivered by a Level 4 Cardiac Rehabilitation Exercise Specialist from High Life Highland using Microsoft Teams. The classes will be delivered to the experimental group participants and control group participants who elect to take part.
Purpose 4: Introductory session	You will be invited to attend an introductory session with a researcher via Microsoft Teams. The purpose of the session is assist you with the technology you will be using (e.g. the Fitbit device) and answer any questions about the study. During this introductory session resting heart rate and blood pressure will be collected via the provided blood pressure monitors. We will also ask you to conduct a sit-to-stand test, provide instructions about completing a 6-minute walk test and complete some questionnaires.

Our legal reason for using the data is/are:

- Use is necessary for the performance of a task being carried out in the in the public interest ‘public task’. That public task being the University’s task to carry out quality fundable research pursuant to the Further and Higher Education (Scotland) Act.

The data being used includes special category (sensitive) data. Our legal reason for using this sensitive data is/are:

During the project you will be asked questions about your health, where these questions are pertinent to the research being undertaken. UHI will be collecting your health data. UHI does so under the following processing condition:

Processing is necessary for the purposes of scientific purposes in the public interest.

The following personal data being used for this process has originated from a third party:

Fitbit – For purpose 1, UHI will be collecting physiological data about you and your activity. The data is passed to UHI from the Fitbit service. You wear the Fitbit and collect the data by wearing the device and UHI collects relevant data from the Fitbit server that holds the information when you upload it to your Fitbit account. UHI will only be able to access the data you make available.

UHI will collect the following data from your Fitbit account for the purposes of this research study:

1) General information.

Your name so that the research team can manage your data and analyse it properly.

2) Step count data.

UHI will be provided with a constant (24 hour) detail of your steps telling it how many steps you take and when. For example: 53 steps at 4.25pm and 0 steps at 4.26pm.

3) Heart rate data.

UHI will be provided with constant (24 hour) detail of your heart rate at all times that you're wearing the device. For example: 63bpm average at 4.25pm and 80 bpm average at 4.26pm.

4) Energy expenditure.

UHI will be provided with a constant (24 hour) measure of ongoing energy expenditure at all times that you're wearing the device. For example: 4 calories at 4.25pm and 6 calories at 4.36pm.

5) Wear time

UHI will be provided with a constant (24 hour) measure of when you wore the device and how long you wore it for. For example: 10/03/2021 between 9am and 10pm.

6) Activity history (only if the Exercise option is selected when using the device)

UHI will be provided with a measure of what specific activity, if any, you performed, and the details related to that activity. For example: date: 10/03/2021, activity: running, steps: 2500, distance: 2km, duration: 1 hour 30 minutes, calories: 300.

Your data will, or may, be shared with the following recipients or categories of recipient:

Fitbit

As part of the study, you will be asked to sign up for a Fitbit account, wear a linked Fitbit device and share relevant Fitbit-generated data with the research team (more information on the data shared with the research team is available in the 'The following personal data being used for this process has originated from a third party' section of this notice).

Please note that you will be required to sign up for Fitbit and accept their terms of use and privacy policy in order to use the Fitbit services and take part in this study. Please only take part in this study if you have read, understood and are willing to accept the relevant Fitbit terms.

The data shared with Fitbit will be the personal details you enter when you create the account, and the data Fitbit collects when you use the Fitbit services. Further details of the data collected by Fitbit is available in the Fitbit terms of service and privacy policy. You may also have some control over how some of your data is collected, processed, and shared by Fitbit from your account options.

Fitbit terms of service: <https://www.fitbit.com/global/uk/legal/terms-of-service>;

Fitbit privacy policy: <https://www.fitbit.com/global/uk/legal/privacy-policy>

UHI software hosting company: Research software hosted for UHI by Amazon Web Services

UHI uses research software to collate and analyse research data. This research software is hosted for UHI by Amazon Web Services in the UK. AWS will not use or access your personal data, they provide hosting for the software used to analyse the data.

UHI – Microsoft Teams

Exercise sessions: If you are scheduled to take part in the HLH intervention exercise sessions, these sessions are delivered over video conference using the Microsoft Teams system. Your data, therefore, will be used in this system. UHI uses the Microsoft Teams system under a contract with Microsoft.

Focus group and focus group recording: The focus group session is due to be delivered and recorded using Microsoft Teams' Video Conference facility. If you are scheduled to take part in the Focus group part of the study (all participants still a part of the study at the time of the focus group), then your data will be used in Microsoft Teams to invite you to the focus group session(s). If you take part in the focus group then you will be visible to other participants; your name will be visible to other participants, and your video and audio will be visible (as far as you allow this). All of the focus group sessions will be recorded using the Microsoft Teams recording function, the recording will be created and used by UHI for this research project.

High Life Highland

If you are scheduled to take part in the HLH intervention exercise sessions, your data will be shared with HLH who deliver the sessions on UHI's behalf under contract with UHI. Your data will only be used by HLH for the purposes of delivering the exercise sessions as part of this research study.

This process involves your data being sent outside of the UK or is subject to a restricted transfer (transfer outside the control of the UK GDPR).

Fitbit

By using Fitbit, you will upload your data to the Fitbit service. Fitbit is an international organisation and process data worldwide. Fitbit operates offices in the following countries:

United States of America, Ireland, Hong Kong, China, Republic of Korea (South Korea), Romania, Belarus, India, Japan, Singapore.

More information will be provided to you when you sign up for the Fitbit service –

Fitbit terms of service: <https://www.fitbit.com/global/uk/legal/terms-of-service>;

Fitbit privacy policy: <https://www.fitbit.com/global/uk/legal/privacy-policy>

This international transfer takes place with the following safeguards in place:

Fitbit Transfers:

Your consent and standard contractual clauses. More information will be provided to you when you sign up for Fitbit the Fitbit service -

Fitbit terms of service: <https://www.fitbit.com/global/uk/legal/terms-of-service>;

Fitbit privacy policy: <https://www.fitbit.com/global/uk/legal/privacy-policy>

Your data will be retained for the following length of time:

BY UHI:

Minimum of 5 years to indefinite. Some data are valuable long after collected.

This retention period is in respect of the research data as collected. Anonymised data may be kept for longer and the retention period does not apply to any materials published as a result of this project.

Preservation of data from research is important for a number of reasons: it supports Open Science and promotes reproducibility (important for transparency); it provides an audit trail (important for good governance); it enables future research opportunities through data sharing.

BY FITBIT:

Fitbit will keep data for as long as you have an account. If you choose to delete your account, please note that while most of your information will be deleted within 30 days, it may take up to 90 days to delete all of your information, like the data recorded by your Fitbit device and other data stored in the Fitbit backup systems. This is due to the size and complexity of the systems Fitbit use to store data. Fitbit may also preserve data for legal reasons or to prevent harm. For further information, please see the Fitbit privacy policy: <https://www.fitbit.com/global/us/legal/privacy-policy#data-retention>.

BY HIGH LIFE HIGHLAND:

The length of time you are engaged in the exercise classes associated with this research study. After this period HLH will delete your data.

The following rights are rights of data subjects:

- The right to access your personal data
- The right to rectification if the personal data we hold about you is incorrect
- The right to restrict processing of your personal data

The following rights apply only in certain circumstances:

- The right to withdraw consent at any time if consent is our lawful basis for processing your data
- The right to object to our processing of your personal data
- The right to request erasure (deletion) of your personal data
- The right to data portability

You also have the right to lodge a complaint with the Information Commissioner's Office about our handling of your data.