

## **Privacy Policy (Last Updated 30 June 2021)**

We at Education Perfect care deeply about the safety, security and privacy of you when you use our website and any of our e-learning services ("**our services**"). Our goal is to provide a learning environment that is every bit as safe and secure as being at school.

### **Privacy Pledge**

We are committed to carrying out responsible and appropriate use of student personal information collected when using our services. This is reflected in our Student Privacy Pledge (available at <https://studentprivacypledge.org/privacy-pledge/>).

The Student Privacy Pledge set out the key principles we will adhere to, including:

- Not to collect, maintain, use or share student personal information beyond that needed for authorised educational/school purposes, or as authorised by the parent/student.
- Not to sell student personal information.
- Not to use or disclose student information collected through an educational/school service for behavioural targeting of advertisements to students.
- Not to build a personal profile of a student other than for supporting authorised educational/school purposes or as authorised by the parent/student.
- Not to knowingly retain student personal information beyond the time period required to support the authorised educational/school purposes, or as authorised by the parent/student.

We also commit not to make material changes to this privacy policy or other privacy policies without first providing prominent notice to the account holder(s) and allowing them choices before data is used in any manner inconsistent with terms they were initially provided. Further, we will not make material changes to other policies or practices governing the use of student personal information that are inconsistent with our contractual requirements.

### **Privacy Policy**

This privacy policy covers our collection and use of your personal information. We might update our Privacy Policy from time to time, in which case we will update the link to the Privacy Policy on our website. If we make material changes to our Privacy Policy, we'll provide you with prominent notice as appropriate under the circumstances, e.g., by displaying a prominent notice within our services or by sending you an email. We may notify you in advance.

This privacy policy will cover the following:

- What personal information we may collect about you (and how we collect it)
- How long we keep your personal information for and where we store it
- How we may use the information we collect
- Whether we will give your information to anyone else
- Your rights and responsibilities
- Where you can find more information
- Information about links
- Our contact details

This policy has been written in accordance with the General Data Protection Regulations (GDPR), the Australian Privacy Act (including the Australian Privacy Principles), the New Zealand Privacy Act 2020 and US data protection laws (including the Children's Online

Privacy Protection Act of 1998 and its rules, or "COPPA" and the California Consumer Privacy Act, or "CCPA").

Information for parents of children under age 13 can be found on page 6 of this document.

### **What personal information we may collect about you**

We may have collected personal information about you from the following people or places (including within the last twelve months):

<b>Students</b>	<p><u>From your teachers</u></p> <p>If you use Education Perfect through your school, then your school will provide the following information about you so that we can create an account for you:</p> <ul style="list-style-type: none"><li>• your first and last names</li><li>• name of your school</li><li>• your school ID</li><li>• your classes</li></ul> <p>Your teacher may also contact us on your behalf if there are questions about your personal data or to let us know if there are any problems with our services.</p> <p>If you hold an individual licence (rather than using the school licence), then we may collect this information directly from you or from the card holder who purchases the licence on your behalf.</p> <p><u>From you</u></p> <p>When you first login to our website, we will ask you to change your password and to provide us with your email address. You do not have to give us your email address but if we don't have this information then we may not be able to assist with password resets if you forget your password.</p> <p>We may also collect information about you when you contact us for help so that we can answer your questions (including details about your questions and an email address to contact you with the answers, if required.)</p> <p><u>From our website</u></p> <p>When you visit our website, it will automatically collect some information about you:</p> <ul style="list-style-type: none"><li>• your answers and results on lessons, homework, quizzes and competitions;</li><li>• your use of the website (for example, when you login and how long you spend completing lessons);</li><li>• your completion of assignments;</li><li>• details about your device (for example, your internet (IP) address, your location and the type of browser that you use, and its identity in the form of a "cookie").</li></ul>
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<b>Teachers</b>	<p>When we sign you and your school up to our services, we will also collect some of your personal information (e.g. first and last names, job and title, school name and address, school ID, email address and contact number, and billing or account details).</p> <p>You can optionally configure your EP Community Profile by submitting a profile image and/or bio to us. You can control the visibility of this additional profile data by choosing between “all teachers”, “teachers at my school” or “only me”.</p>
<b>Parents</b>	<p>We may collect your email address (either directly or via the relevant school), name and details of which student is your child. In some cases, we may also collect log in details for you if you log in to our services.</p> <p>If you purchase an individual licence for your child to use our services, we will also collect your address and payment information.</p>

In order to collect some of the data described in the preceding table, we may use cookie technology on our website. A cookie is a small piece of information which is sent to your browser and stored on your computer’s hard drive, mobile phone or other device. Cookies do not damage your computer.

You can set your browser to notify you when you receive a cookie. This enables you to decide if you want to accept it or not. However, some of our services may not function properly if your cookies are disabled. We use cookies that are necessary for the performance of our services and cookies that do not personally identify you, but may be used for analytics purposes, such as allowing us to see how many people use and access our website so that we can improve our services.

We do not track you across third party websites to provide targeted advertising, and therefore our site does not respond to Do Not Track signals from your web browser.

### **How long we keep your personal information for and where we store it**

We will keep your information while you are an active user of our services and, provided your school continues to hold a licence, we may keep it for up to 3 years to enable you to reactivate your account and access your learning history as you move between classes. We regularly review our information retention rules to make sure we are not keeping it for longer than we need to, but you can ask us to remove your information at any time (see below for more details).

An element of the service that Education Perfect provides is the ability to track your learning journey across multiple years. In the event that you (or your school) choose not to re-subscribe for an Education Perfect license, for example because you are not enrolled for a subject offered by EP in a given year, we will retain your account and historic learning data to ensure that if you return in the future, the work you have previously completed is still available and associated with your account. If your account remains inactive for a period of 3 years we will delete your account and anonymise or delete your learning data so that it can only be used in a non-identifying manner for analysis by your school or to improve our products. You or your school may notify us that you no longer require us to retain past learning data before this 3 year period has passed, in which case we will take this action sooner.

Our company is established and headquartered in New Zealand with operations and offices elsewhere in the world. Data is stored in Sydney by Amazon Web Services. We may use third parties in other countries to process data for us and may securely transfer your personal information from time to time to our offices or to our third-party data processors only where necessary in connection with our operations and providing our services to you. We will always endeavour to keep your data safe whenever we move it and transfer and deal with your personal information carefully and in accordance with your country's applicable laws.

### How we may use the information we collect

In most cases, we act as a "data processor" and use your information only as instructed by your school to make sure that we can provide our services to you. We may need to use, collect, store or otherwise process your information as explained below:

<p><b>Students</b></p>	<p><u>For the purpose of providing services as required by our contract with your school (or under your individual licence):</u></p> <p>We will use the information that we have collected about you to:</p> <ul style="list-style-type: none"> <li>• maintain a record of your learning on our platform, for example copies of your completed homework assignments, so that these can be reviewed and marked by your teachers and so that you have a record of your work;</li> <li>• keep you updated about your e-learning on our services. For example, to remind you of due dates for homework assignments, to let you know how many of your classmates have completed an assignment, and to update you on your performance in assignments and competitions;</li> <li>• help your studies by sharing your e-learning progress with your teachers and parents (for example, that you have completed assignments, your scores on assignments and your competition performance);</li> <li>• email you to tell you of upcoming competitions that you and/or your school are participating in or to congratulate you on your results;</li> <li>• publish your competition results on our scoreboard, which is publicly available. To give you credit, we will use your first name, the first letter of your last name, your school and the country it is in – this information will be visible to all registered users of our services (e.g. the teachers and students at other schools). Your full name and score is only visible to your classmates at your school. Your school may give you the option to change your username and anonymise your publicly available details;</li> <li>• maintain and improve our services. For example, we can use statistical information about how long all students spend on a lesson, or the number of your classmates who have completed an assignment, to make sure that the lesson or assignment is not too simple or difficult. Such</li> </ul>
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	<p>information will only ever be used on a grouped basis so that you (or your classmate) will never be identified individually;</p> <ul style="list-style-type: none"> <li>• use the information that our website collects about you to improve your experience while using our services – for example, to identify that it really is you; and</li> <li>• identify you when you call us for help on technical problems (for example if you report a problem with our website or the content) or to email you a new password when you have asked for one.</li> </ul>
<b>Teachers</b>	<p><u>For the management and administration of our contract:</u></p> <p>We will use the information that we have collected about you to provide our services, and to carry out administrative tasks such as managing our relationship with your school and for billings and invoicing purposes, as may be necessary in order to perform our contract with your school.</p> <p><u>For marketing purposes and our legitimate business interests:</u></p> <p>We will also use the information to communicate with you where we have a legitimate interest to do so – for example, sending you information about new learning resources and products that are being made available. You can opt out of receiving such communications at any time by clicking the unsubscribe link or following the instructions in the email.</p>
<b>Parents</b>	<p><u>For the purpose of providing services as required by our contract with your child's school (or under your individual licence):</u></p> <p>We will use your contact information to keep you updated about your child's performance on our services, where this option has been exercised either by you or the relevant school.</p> <p><u>For the purpose of entering into a contract and for marketing purposes:</u></p> <p>We will also use your information for payment purposes and we may contact you with information about upcoming competitions and new e-learning opportunities that may be of interest – you can opt out of receiving such communications at any time by clicking the unsubscribe link or following the instructions in the email.</p>

### **Whether we will give your information to anyone else**

We may also need to use your information to protect ourselves from criminals or fraudsters and in some circumstances, we may also need to share or use your information to make sure that we follow the law. We may also use or transfer your information to a successor entity in the event that we sell or transfer all or a portion of our business or assets (including in the event of a merger, reorganization, spin-off, dissolution or liquidation) and we will endeavour to ensure that the successor entity applies this policy to such information.

We will keep your personal information safe and will not give it to any third party except as explained in this policy or where we are allowed to do so by law.

[Other than as described above, we have not disclosed personal information for a business purpose to other third parties. We do not sell personal information.]

### **Your rights and responsibilities**

While we do our best to keep your personal information safe and private by following high standards, no security and safety system is 100% secure. You have to play your part in ensuring that your username and password are kept safe, and tell us when your account has been accessed without permission.

You may have the right to ask us to:

- give you a copy of your personal information that we have collected
- update or correct any personal information about you that is wrong
- stop collecting your personal information
- remove your personal information from our records

Just let your school know your concerns or drop us a message at [support@educationperfect.com](mailto:support@educationperfect.com).

If you think we are not doing a good job with your personal information, you also have the right to make a complaint by sending us an email at [support@educationperfect.com](mailto:support@educationperfect.com). If you lodge a complaint with us, we will respond promptly, and then determine what action needs to be taken (if any) to resolve the complaint. We will respond to your complaint within the shorter of 20 working days or 30 calendar days (or as otherwise required by law).

You also have the right to make a complaint to the government bodies that regulate us. More details are available here:

- Europe: [http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm)
- Australia: <https://www.oaic.gov.au/individuals/how-do-i-make-a-privacy-complaint>  
The Office of the Australian Information Commissioner can be contacted at [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au) or by telephone on 1300 363 992 (from Australia) or on +61 2 9284 9749 (from overseas)
- New Zealand: <https://www.privacy.org.nz/your-rights/complaint-form/>. The New Zealand Privacy Commissioner can be contacted at [investigations@privacy.org.nz](mailto:investigations@privacy.org.nz) or by telephone on (04) 474 7590 (Wellington) or (09) 302 8680 (Auckland).

We will not discriminate against you for exercising any of your rights.

### **Rights and responsibilities for parents of children under the age of 13**

COPPA provides certain rights and responsibilities to parents of children under the age of 13 that provide us personal information. This section of the policy only applies to children under the age of 13.

We do not permit children under the age of 13 to create an account or provide us personal information without your or the school's verifiable consent. Such consent may be provided, for example, through teachers providing a secure class join code to permit a student to set up an account. If you believe we have collected information from a child under age 13 without

such consent from the school, please contact us at [support@educationperfect.com](mailto:support@educationperfect.com) so that we may delete the information as soon as possible.

We will not require a child under the age of 13 to provide us with more information than is reasonably necessary to use our site and services.

At any time, you may review your child's personal information maintained by us, including requiring us to correct or delete the personal information and/or withdrawing and refusing to permit us from further processing your child's information. You can also refuse to allow us to disclose information to third parties that is not necessary for the use of our site and services. You can do this by sending us an email at [support@educationperfect.com](mailto:support@educationperfect.com). To protect the privacy and security of your child, we may require you to take certain steps to verify your identity.

### **Where you can find more information**

If you have any questions about our privacy policy, please ask your teachers or parents for guidance. Or, you can reach out to us directly at the contact details below and we would be more than happy to help.

If you receive marketing communications from us (as further explained in this privacy policy), you will always have the option to "unsubscribe" by simply clicking the link in the relevant email or by contacting us.

### **Information about links**

Our website might link to external websites, which we have no control over. Please be careful to protect your privacy when visiting these websites.

### **Our contact details**

In most cases where you are using our services in Europe, we will be what is called a "data processor" in relation to your personal data because where you use Education Perfect through your school, we will only use your personal data on the instructions of your school to provide you with access to the Education Perfect services.

Your school will be what is called a "data controller" so if you have questions about the use of your personal data, you should ask your teachers first. However, you can always contact us at the following details if you do have any questions.

- Office Location: 77 Vogel Street, Dunedin, New Zealand
- Mail address: Education Perfect, PO Box 6552, North Dunedin, Dunedin 9059, New Zealand
- Email: [support@educationperfect.com](mailto:support@educationperfect.com)
- Phone: NZ +64 3 669 0311, AUS +61 2 6100 3723, UK +44 20 8068 1832, US +1 (202) 657 5224