

Now @ School

Privacy Policy

At Now@School, we value your privacy and understand the importance of keeping your personal information secure. We have this Privacy Policy to help you understand how we collect, store, use and remove the information that you provide us.

This policy explains our privacy and security commitments.

NOW@SCHOOL (collectively, 'NOW@SCHOOL' or 'us' or 'we') is an e-learning resources owned and operated by The Firm Global Communications Pty Ltd ACN 643 460 333 ('the Company').

We produce online resources in an app that facilitates non-verbal communication between a student and a teacher.

References to the App in this Privacy Policy include all NOW@SCHOOL products and resources that we produce and distribute.

NOW@SCHOOL is committed to protecting the safety and security of our registered users, including students, teachers, school administrators and parents (collectively, Registrants) and we are sensitive to concerns about the safety of the personal information provided to us.

Please read this Privacy Policy carefully to understand how any personal information collected by us is used.

As a global company, our Privacy Policy has been developed in accordance with a range of legislation. This legislation includes, but is not limited to:

- *The Australian Privacy Act 1988*
- *The New Zealand Privacy Act 1993*

Personal Information

We collect personal information to provide Registrants our learning products, services and related information. The kinds of personal information we collect depends on how you interact with us.

We may collect the following categories of personal information:

Personal information held by us may include your:

- name and date of birth;
- residential and business postal addresses, telephone/mobile numbers and email addresses;
- bank account and/or credit card details for agreed billing purposes;
- your computer and connection information; and
- any information that you otherwise share with us.

We may also collect details of other interactions that you have with us, together with any other information that you choose to provide us with, for example, through your interactions with our customer and technical support teams.

In the case of school/educational institution customers (School Customer), we seek consent from the School Customer to be provided with Registrant information for and on behalf of that student or teacher.

In the case of individual / home subscriptions (Home Customers) we seek consent from the Home Customer at the time of purchasing and registering the product to use the information collected from them (including the student).

Subscriptions on behalf of a student who is a minor must be completed by the student's parent or legal guardian.

Registrants who do not give this consent (or do not have this consent provided on their behalf) cannot provide us with their personal information and cannot use the App.

You can withdraw your consent at any time.

WE NOTE THAT THE SCHOOL CUSTOMER MAY ALSO COLLECT PERSONAL INFORMATION FOR THE PURPOSES OF USING OUR APP. YOU SHOULD OBSERVE AND/OR REFER TO ANY PRIVACY POLICIES OF THE SCHOOL CUSTOMER WHEN PROVIDING PERSONAL INFORMATION THROUGH OUR APP.

How we collect and process your Personal Information

We may collect your personal information in a number of ways, including:

- directly from you (unless it is unreasonable or impracticable to do so);
- from our School Customer (e.g. teachers or school administrators that purchase access to our App for their students and teachers); or
- from third parties such as our distributors (resellers or sales agents).
- You may provide us with personal information when you contact us via our web Apps, by email or by phone or through feedback surveys. The information you provide will assist us in responding to your enquiry, or you may provide information anonymously.

Personal information for account subscription

For Home Customers, a parent or carer registering on behalf of their child(ren) must provide consent at the time of registration to the collection, use and disclosure of personal information relating to themselves and their child(ren) **where that information is reasonably necessary** to create and administer an account, provide the Services, and implement appropriate cyber security and access-control measures.

We do not provide access to the Services to students under 13 years of age, or to students who are legally a minor in their relevant jurisdiction, unless a parent or carer has provided consent and the information required to administer the account. **For students under 18 years of age, parental or carer consent is required to enable identity verification, secure authentication, monitoring, and other cyber security measures necessary to protect personal information and prevent unauthorised access or misuse of the Services.**

For School Customers:

- Teachers or administrators registering for their class or school must give their consent at the time of registration to provide us with their own name, class name, school name and their email address to administer the school / education institution's account, as well as student details (name, class, and age).

We also ask for Registrants' consent to use any personal information collected in accordance with this Privacy Policy at the time of login to our App.

If a Registrant does not wish to provide us with their consent, they are unable agree to the App Terms and Conditions and must not use the App.

Personal information within in-program access

The personal information or identifiers provided to us from the parent or teacher will be used in our programs to deliver our Services.

The learning activities in our education programs may also allow personal information to be collected and processed as follows:

- Students and teachers may access learning activities that allow emotions, moods, or feelings to be expressed.
- The information may be viewed by the subscribed Registrants within their account permissions.
- The teacher or parent may give additional consents for activities that we administer.

In circumstances personal information is entered by the user, consent is given by School or Home Customer to NOW@SCHOOL to use the information to deliver and these learning activities.

For School Customers, we do not enable additional services from third parties (such as class administration services) to collect or use personal information unless you have agreed to receive those services. In those circumstances the terms of the third party in relation to the collection and use of personal information will also apply.

IP addresses

Our App may also collect Internet Protocol (IP) addresses. IP addresses are assigned to computers on the internet to uniquely identify them within the global network.

We collect and manages IP addresses as part of the service of providing internet session management and for security purposes. The Company may also collect and use web log, computer and connection information for security purposes and to help prevent and detect any misuse of, or fraudulent activities involving, our app.

Cookies

Our App may use "cookies" to help personalise your experience. A cookie is a text file or a packet of information that is placed on your hard disk by a web page server to identify and interact more effectively with your computer.

There are two types of cookies that may be used at this site: a persistent cookie and a session cookie. A persistent cookie is entered by your web browser into the "Cookies" folder on your computer and remains in that folder after you close your browser, and may be used by your browser on subsequent visits to this site.

A session cookie is held temporarily in your computer's memory and disappears after you close your browser or shut down your computer. Cookies cannot be used to run programs.

Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you. In some cases, cookies may collect and store personal information about you. The Company extends the same privacy protection to your personal information, whether gathered via cookies or from other sources.

You can configure your internet browser to accept all cookies, reject all cookies or notify you when a cookie is sent. Please refer to your internet browser's instructions to learn more

about these functions. Most web browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of this site.

Our App uses cookies in order to:

- remember your preferences for using this the App;
- facilitate e-commerce transactions, to ensure that your order is remembered between pages during the checkout process;
- show relevant notifications to you (eg, notifications that are relevant only to users who have, or have not, subscribed to newsletters or email or other subscription services); and
- remember details of data that you choose to submit to us (eg, through online contact forms).

Many of these cookies are removed or cleared when you log out but some may remain so that your preferences are remembered for future sessions.

Third party cookies

In some cases, third parties may place cookies through our App. For example:

- Google Analytics, one of the most widespread and trusted website analytics solutions, may use cookies de-identified data about how long users spend on this site and the pages that they visit;
- Google AdSense, one of the most widespread and trusted website advertising solutions, may use cookies to serve more relevant advertisements across the web and limit the number of times that a particular advertisement is shown to you; and
- third party social media applications (eg, Facebook, Twitter, LinkedIn, Pinterest, YouTube, Instagram, etc) may use cookies in order to facilitate various social media buttons and/or plugins in our App.

What we will do with your information

The information collected from Registrants, customers or prospective customers may be used for the following purposes:

- to provide access to our products and services;
- to manage prospective purchases, purchased subscriptions and payments including to provide quotes or offers ;
- to send a confirmation notice to the Registrant of the registration;
- to administer and manage accounts, including password resetting, responding to questions raised by Registrants,
- to contact the Registrant about any problems with the Registrant's account or conduct on the App;
- to receive updates about our products and services;
- to send out a NOW@SCHOOL newsletter or emails about the App including information about current events, changes, improvements, upgrades, new product development and rules of the App;

- for administrative, planning, product or service development, staff training, quality control and research purposes relating to our products and services;
- for marketing purposes, but only where we have express or implied consent to contact someone or we are otherwise permitted by law to do so.

Registrants may also opt out at any time by following the specific opt out instructions within the communications that we send.

The App does not provide students with any means to communicate directly with each other.

There are no chat rooms connected with the learning resources.

Access to, and use of customer feedback forums or our professional online communities, are designed and limited for use by parents, educators and/or other contributors who are not legally minors.

The App may have additional features in which parents and teachers can give their consent, and/or give consent on behalf of a student, to access, disclose or use their personal information or learning activity information.

What we will not do with your personal information

NOW@SCHOOL will keep your personal information confidential and not sell or disclose your information to advertisers or any external third parties, unless:

- we believe, in good faith, that we are required to share your information with a third party such as a regulator or court in order to comply with law, regulation, legal process, court order or subpoena;
- to enforce our Terms & Conditions or the terms of the licence granted to access and use the App;
- the disclosure is to a third party that acts on our behalf, powers certain aspects of our Apps or processes data on our behalf, such as a distributor of our products and services, the licensor or owner of a product or resource that we distribute, or to a contracted service provider;
- in connection with any transaction involving our companies or assets, where another party acquires ownership or operation of the App, in which case that successor organization will be subject to the obligations in this Privacy Policy and any contractual representations we have entered into, and subject to law; or
- to protect the safety and security of our Registrants and our App.

If third parties act on our behalf, we require them to hold, use and disclose your personal information in accordance with this Privacy Policy, applicable privacy obligations and our contractual obligations.

Generally, we will only use your information within NOW@SCHOOL, however, sometimes we provide data on results to government education departments, peak bodies managing or representing schools, or schools themselves, especially in the case of School Customers, who use the features of our products (such as performance reporting tools) for educational/teaching purposes.

We will require these third parties to comply strictly with our instructions, use the information only for legitimate educational interests and not for any commercial purposes.

We do not sell data to advertisers (whether personal, anonymous or aggregated). We do not use data to engage in targeted advertising to children and we do not create or build personal

profiles of students other than for the purpose of supporting authorized educational/school purposes or as otherwise specifically authorized by a parent/student or school/educational institution customer.

We do not use cookies or third party providers to engage in behavioural targeting of advertisements to students. For more information refer to our Cookies & Third Party Technologies Policy.

We are committed to maintaining the confidentiality of the information that you provide us and we will take all reasonable precautions to protect your personal information from unauthorised use or alteration.

Personal information may be stored both electronically (on our computer systems and with our website hosting provider) and in hard-copy form. Firewalls, anti-virus software and email filters, as well as passwords, protect all of our electronic information. Likewise, we take all reasonable measures to ensure the security of hard-copy information.

How long we hold your information

We retain the personal information that we collect from and about our Registrants for as long as it is needed to provide access to the App or to manage that Registrant's account.

We take reasonable steps to delete the personal information we collect if your registration to use our App lapses and you (or if you are under 13 or legally a minor in your relevant location, a parent or guardian may request on your behalf) opt out of receiving further communications from us, or if you ask us to delete your information.

We may however retain and use personal information as necessary to comply with our legal and regulatory obligations, to resolve disputes and to enforce our agreements, and we may retain and use anonymous and aggregated information for performance reporting, benchmarking and analytic purposes and for product and service improvement.

Registrants can request that their personal information be deleted by contacting us: admin@nowsafteyapps.com.

Updating and accessing your personal information

Registrants have a right to request a copy of the personal information we hold about them, and Registrants can also update their personal information at any time, in each case by contacting NOW@SCHOOL.

If you wish to receive a copy of this information or to update or correct information held about you, please address your request to the Privacy and Data Protection Officers at admin@nowsafteyapps.com. We will endeavour to deal with your request promptly.

Keeping your personal information secure

NOW@SCHOOL is committed to information security. We will use all reasonable endeavours to keep the personal information we collect and use in a secure environment, and we have implemented appropriate technical, administrative and physical security measures that are designed to protect personal information from unauthorised access, disclosure, use and modification. These measures include the encryption of personal information and the implementation of organisational measures, such as our incident response plan. As part of our privacy compliance processes we review these security procedures to consider appropriate new technology and methods and engage independent third parties to review and audit aspects of our information security.

Our App developer, ROSCAR PTY LTD utilises INTERACTIVE PTY LTD for data hosting and storage. Both providers are recognised for their leading approaches to data security.

Further information regarding INTERACTIVE PTY LTD's privacy and security practices, including the latest updates and compliance information at:

<https://www.interactive.com.au/privacy-policy/>

We provide our personnel with training about data security and privacy, and we require all our employees and contractors to comply with this Privacy Policy and their obligations of confidentiality. We will take appropriate actions to address breaches by employees and contractors of the obligations imposed by this Privacy Policy.

Data transfers, storage and processing globally

Registrants' personal information is uploaded to and stored on servers that are maintained by third party provider, INTERACTIVE PTY LTD, at locations in Australia.

As our third party provider operates globally, we may on occasion allow your personal information to be accessed in countries other than your own location. We may do this where data is accessed:

- by our sales, operational or global customer support teams (located in Australia); or
- by one of our licensors (who owns, develops and hosts a particular product) or distributors (sales agents or resellers) who requires the information to set up, service or manage a customer account;
- where a copy is sent to the Registrant itself at their request.

By consenting to the collection and use of their personal information, Registrants' consent to their personal information being transferred and stored in this manner.

We may record, with your express consent, calls with customers for quality and staff training purposes. If, with your consent, we record a telephone call for this purpose, that recording will be stored in data centres located in Australia and deleted when no longer required.

Anonymous or aggregated information

In addition to personal information and results data, NOW@SCHOOL also collects anonymous information about Registrants and the activities of Registrants on the App.

Anonymous information is information that is not linked to the name or identity of a user. This information is used for educational performance reporting and analytics and to assist us in enhancing the learning resources. The information remains anonymous at all times.

NOW@SCHOOL powers certain elements of the Company's online marketing and advertising using information from third-party service providers that already know about you (referred to as 'retargeting').

We may collect information about where you saw the ads and what ads you clicked on. This is data that does not personally or directly identify you. We do not engage in this type of marketing or advertising to students or children.

When agreeing to the Term and Conditions, Registrants grant us the right to use this anonymous information for our own purposes, such as the preparation of statistical reports or to improve and change the content of our products.

Revision of Privacy Policy

NOW@SCHOOL reserves the right to change, modify, or revise this Privacy Policy in order to

comply with any applicable laws, to reflect changes in our processes or for any other reason at any time.

We will notify Registrants when we update this Privacy Policy by publishing our notification on the App. We also communicate important changes in our Privacy Policy to Registered Users and customers during their subscription term.

By accessing our learning App you consent to the terms under which we process your information set out in this Privacy Policy, including how we notify you of amendments to this Privacy Policy.

Copyright

All Proprietary Content is the property of us or its licensors (as applicable) and is protected by Australian and international copyright laws. You must not reproduce, transmit, republish or prepare derivative works from any of the Proprietary Content, except as expressly authorised by these policies or with our prior written consent or other copyright owner (as applicable).

You may download and print out content from the app only for your own personal and non-commercial use and provided that you do not remove or modify any copyright, trademark or other proprietary notices.

The term "Proprietary Content" means:

- the app;
- all of its content (including all of the text, graphics, designs, software, data, sound and video files and other information contained in this site, and the selection and arrangement thereof); and
- all software, systems and other information owned or used by the Company in connection with the products offered through this site (whether hosted on the same server as this site or otherwise).

Trademarks

Our logo and the phrase "Now@School" are trademarks of the Company. The look and feel of this site (including all button icons, scripts, custom graphics and headers) are the trademarks, service marks and/or trade dress of us.

These trademarks, service marks and trade dress may not be used, copied or imitated, in whole or in part, without our prior written consent.

Copyright claims

If you believe that our App contains any material that infringes upon any copyright that you hold or control, or that users are directed through a link on this site to a third party website that you believe is infringing upon any copyright that you hold or control, you may send a notification of such alleged infringement to us in writing.

Such notification should identify the works that are allegedly being infringed upon and the allegedly infringing material and give particulars of the alleged infringement. In response to such a notification, we will give a written notice of a claim of copyright infringement to the provider of the allegedly infringing material.

If the provider of that material does not respond to us in writing denying the alleged infringement within 14 days after receipt of that notice, we will remove or block the allegedly infringing material as soon as is reasonably practicable.

If the provider of that material responds to us in writing denying the alleged infringement, we will, as soon as is reasonably practicable, send a copy of that response to the original notifying party. If the original notifying party does not, within a further 14 days, file an action seeking a court order against the provider of the allegedly infringing material, we may restore any removed or blocked material at our discretion. If the original notifying party files such a legal action, we will remove or block the allegedly infringing material pending resolution of that legal action.

Contact Us

All requests to access, update and delete personal information as well as questions and concerns about your personal information and this Privacy Policy should be directed as follows:

admin@nowsafteyapps.com

If you have a question or a complaint you can also email us at:

admin@nowsafteyapps.com

We will endeavour to respond to your query as quickly as possible.

If you are not satisfied with the response you receive, you may have the right to contact the regulator responsible for privacy in your home country.