Privacy Policy

Last Updated 28 November 2019

Effective: March 2014

1. **Introduction**

   This Privacy Policy explains what information Schoolbox Pty Ltd ("Schoolbox") and its related entities collect about you and why, what we do with that information, how we share it, and how we handle the content you place in our products and services. Schoolbox care about your personal information and how this is used and shared. Schoolbox will only use any data of a personal or sensitive nature that we collected as necessary for business transactions between us and for the purposes of providing information about our services and products.

2. **Scope of Privacy Policy**

   This Privacy Policy applies to the information that we obtain through your use of "Schoolbox Services" via a "Device" or when you otherwise interact with Schoolbox.

   "Schoolbox Services" include our:

   (a) Websites

   (b) Hosted Products

   (c) On-Premise Products

   but does not include:

   (a) Schoolbox products or services for which a separate privacy policy is provided.

   (b) Third party products. These are third party products or services that you may choose to integrate with Schoolbox product or services, such as third party Add-Ons or other software used by you. You should always review the policies of third party products and services to make sure you are comfortable with the ways in which they collect and use your information.

   A "Device" is any computer used to access the Schoolbox Services, including without limitation a desktop, laptop, mobile phone, tablet, or other consumer electronic device.

   Unless otherwise stated, our Hosted Products and our On-Premise Products are treated the same for the purposes of this document.

   By registering for or using Schoolbox Services you consent to the collection, transfer, processing, storage, disclosure and other uses described in this Privacy Policy.

3. **Definitions**

   Add-On: A bundle of code, resources and configuration files that can be used with an Schoolbox product to add new functionality or to change the behavior of that product's existing features.

   Schoolbox Services: Schoolbox's Websites, Hosted Products, and On-Premise Products.

   Content: Any information or data that you upload, submit, post, create, transmit, store or display in an Schoolbox Service.

   On-Premise Products: Schoolbox's software products and mobile applications, including Add-Ons created by Schoolbox, that are installed by customers on an infrastructure of their choice. On-Premise Products do not include Add-Ons created by third parties, even when they are accessed through Schoolbox Services.

   Information: All of the different forms of data, content, and information collected by us as described in this Privacy Policy.

   Personally Identifiable Information (PII): Information that may be used to readily identify or contact you as an individual person, such as: name, address, date of birth, email address, relationships or phone number. PII does not include information that has been anonymised such that it does not allow for the ready identification of specific individuals.

   Hosted Products: Schoolbox's "Hosted" or "Cloud" hosted solutions, as well as other Schoolbox hosted solutions that display a link to this Privacy Policy. For the avoidance of doubt, if an Schoolbox hosted solution displays a link to a different privacy policy, then that other privacy policy shall apply.

Websites: Schoolbox's websites, including but not limited to schoolbox.com.au, and any related websites, sub-domains and pages.

4. **Change to our Privacy Policy**

We may change this Privacy Policy from time to time. If we make any changes, we will notify you by revising the "Effective Starting" date at the top of this Privacy Policy and, in some cases, where appropriate we may provide you with additional notice (such as sending you an email notification). We encourage you to review our Privacy Policy whenever you use Schoolbox Services to stay informed about our information practices and the ways you can help protect your privacy.

If you disagree with any changes to this Privacy Policy, you will need to stop using Schoolbox Services and deactivate your account(s).

5. **The information provided to us**

We collect the following information:

Account and profile information: We collect information about you and your company as you register for an account, create or modify your profile, make purchases through, use, access, or interact with Schoolbox Services (including but not limited to when you upload, download, collaborate on or share Content). Information we collect includes but is not limited to names, usernames, physical addresses, email addresses, phone numbers, photos, job titles, student enrolment details, or credit card details. You may provide this information directly when you enter it in Schoolbox Services, or in some cases another user (such as a system administrator) may provide it on your behalf either directly, or through an automated provisioning service (most commonly when adding or updating account details on Schoolbox Services). If you are providing information (including PII) about someone else, you confirm that you have the authority to act for them and to consent to the collection and use of their PII as described in this Privacy Policy.

Content: We collect and store Content that you create, input, submit, post, upload, transmit, store or display in the process of using our Hosted Products or Websites. Such Content includes any PII or other sensitive information that you choose to include ("passively-collected PII").

Other submissions: We collect other data that you submit as you participate in any interactive features of Schoolbox Services, participate in surveys, contests, promotions, sweepstakes, activities or events, apply for jobs, request customer support, communicate with us via third party social media sites or otherwise communicate with us. For example, information regarding a problem you are experiencing with an Schoolbox product could be submitted to our Support Services or posted in our public forums. Any information, including PII, that you submit to our Websites could be visible to the public unless submitted to a secure area in the Website.

6. **Information we collect from your use of Schoolbox Services**

Web Logs: As is true with most websites and services delivered over the Internet, we gather certain information and store it in log files when you interact with our Websites and Hosted Products. This information includes internet protocol (IP) addresses as well as browser type, internet service provider, URLs of referring/exit pages, operating system, date/time stamp, information you search for, locale and language preferences, identification numbers associated with your Devices, your mobile carrier, and system configuration information. In the case of our SaaS Product, the URLs you accessed (and therefore included in our log files) includes but is not limited to elements of Content (such as search terms, class codes on homepage URLs, unique hash tokens) as necessary for the SaaS Product to perform the requested operations. Occasionally, we connect PII to information gathered in our log files as necessary to improve Schoolbox Services for individual customers.

Analytics Information from Website and Hosted Products: We collect analytics information when you use our Websites, On-Premise and Hosted Products to help us improve our products and services. In the On-Premise and Hosted Products, this analytics information consists of the feature and function of the Schoolbox Service being used, the domain name, the username and IP address of the individual who is using the feature or function (which will include PII if the PII was incorporated into the username), the sizes and original filenames of attachments, and additional information required to detail the operation of the function and which parts of the Schoolbox Services are being affected. For example:

(a) In Schoolbox when you create a homepage we collect information about which template was used, what components were added to the page, the position and the settings used on these components. We also collect information about the types of content and media that is uploaded and embedded into Schoolbox.

As shown in the example above, the analytics information we collect includes elements of Content related to the function the user is performing. As such, the analytics information we collect may include PII or sensitive business information that the user has included in Content that the user chose to upload, submit, post, create, transmit, store or display in an Schoolbox Service.

As of the date this policy went into effect, we use New Relic and Sentry as a server monitoring provider and Google Analytics as an analytics provider. To learn more about the privacy policy of New Relic, refer to New Relic's Privacy Policy. To learn more about the privacy policy of Sentry, refer to Senty's Privacy Policy. To learn more about the privacy policy of Google Analytics, refer to Google's Policies and Principles. Use the Google Analytics Opt-out Browser Add-on to prevent to analytics information from being sent to Google Analytics.

Analytics Information Derived from Content: Analytics information also consists of data we collect as a result of running queries against Content across our user base for the purposes of generating Usage Data. "Usage Data" is aggregated data about a group or category of services, features or users that does not contain PII. For example, we may query Content to determine the most common features or homepage components are used within the system (e.g. what percentage of all instances use the resource booking system effectively) by searching across the Content, or we may query Content to determine which class pages use the course outline homepage component the most to establish the demographic of which year levels use this functionality the most. This is in order to better understand the composition of our user base.

Though we may happen upon sensitive or PII as we compile Usage Data from Content across user instances, this is a byproduct of our efforts to understand broader patterns and trends. It is not a concerted effort by us to examine the Content of any particular customer.

Analytics Information from On-Premise Products: We collect analytics information when you use our On-Premise Products to help us improve our products and services. Our On-Premise Products contain a feature that sends information about the technical operation of the On-Premise Products on your systems ("System Information") to us. System Information includes but is not limited to information about (a) the server environment in which the Self Hosted Product is operating, for example hardware specification (CPU type, RAM allocation, disk utilisation), version information on all software installed (OS type and version, PHP version and modules installed, database types and versions) and all software configuration (network configuration, database settings, web server settings), as well as (b) user client information, for example: browser type and version, native client type and version, and client device specifications (e.g. screen resolution, OS version, device type, etc.). In addition, we collect analytics information from On-Premise Products that is a subset of the analytics information described above for Websites and Hosted Products. You can disable our collection of analytics information from On-Premise Products by submitting a support request via our Help Centre or by blocking collection at the local network level.

Cookies and Other Tracking Technologies: We use various technologies to collect information, including cookies that we save to your computer or mobile device. Cookies are small data files stored on your hard drive or in device memory. We use cookies to improve and customise Schoolbox Services and your experience; to allow you to access and use the Websites or Hosted Products without re-entering your username or password; and to count visits and understand which areas and features of the Websites and Hosted Products are most popular. You can instruct your browser, by changing its options, to stop accepting cookies or to prompt you before accepting a cookie from websites you visit. If you do not accept cookies, however, you may not be able to use all aspects of our Websites or Hosted Products. We also collect information using web beacons (also known as "tracking pixels"). Web beacons are electronic images that may be used in our Websites or Hosted Products or in emails that help us to deliver cookies, count visits, understand usage and campaign effectiveness and determine whether an email has been opened and acted upon.

7. **Information we collect from other sources**

Information from third party services: We also obtain information from third parties and combine that with information we collect through Schoolbox Services. For example, we may have access to certain information from a third party social media or authentication service if you log into Schoolbox Services through the service or otherwise provide us with access to information from the service. Any access that we may have to such information from a third party social or authentication service is in accordance with the authorisation procedures determined by that service. By authorising us to connect with a third party service, you authorise us to access and store your name, email address(es), current city, profile picture URL, and other information that the third party service makes available to us, and to use and disclose it in accordance with this Privacy

Policy. You should check your privacy settings on these third party services to understand and change the information sent to us through these services.

8. **How we use Information we collect**

   General Uses: We use the information we collect about you (including PII to the extent applicable) for a variety of purposes, including to:

   (a) Provide, operate, maintain, improve, and promote Schoolbox Services;

   (b) Enable you to access and use Schoolbox Services, including uploading, downloading, collaborating on and sharing Content;

   (c) Process and complete transactions, and send you related information, including purchase confirmations and invoices;

   (d) Communicate with you, including responding to your comments, questions, and requests; providing customer service and support; providing you with information about services, features, surveys, newsletters, offers, promotions, contests and events; providing other news or information about us and our select partners; and sending you technical notices, updates, security alerts, and support and administrative messages. Generally, you have the ability to opt out of receiving any promotional communications as described below under "Your Choices";

   (e) Process and deliver contest or sweepstakes entries and rewards;

   (f) Monitor and analyse trends, usage, and activities in connection with Schoolbox Services and for marketing or advertising purposes;

   (g) Investigate and prevent fraudulent transactions, unauthorised access to Schoolbox Services, and other illegal activities;

   (h) Personalise Schoolbox Services, including by providing content, features, or advertisements that match your interests and preferences;

   (i) Enable you to communicate, collaborate, and share Content with users you designate; and

   (j) For other purposes about which we notify you.

   Notwithstanding the foregoing, we will not use PII appearing in our Analytics Logs or Web Logs for any purpose.

   Compiling aggregate analytics information: Because our Hosted Products and On-Premise Products are highly configurable, we make extensive use of analytics information (including log and configuration data) to understand how our products are being configured and used, how they can be improved for the benefit of all of our users, and to develop new products and services. As such we generate Usage Data (as defined above) from the web logs and analytics logs described above, including the Content elements captured in such logs, as well as from the Content stored in the Websites and Hosted Products.

9. **Information sharing and disclosure**

   We will not share or disclose any of your PII or Content with third parties except as described in this policy. We do not sell your PII or Content.

   Your use: When you use Schoolbox Services, Content you provide will be displayed back to you. Certain features of Schoolbox Services allow you to make some of your Content public, in which case it will become readily accessible to anyone. We urge you to consider the sensitivity of any data you make public.

   Collaboration: As a natural result of using Schoolbox Services, you may create Content and grant permission to other Schoolbox users to access it for the purposes of sharing and collaboration. Some of the collaboration features of Schoolbox Services display your profile information, including PII included in your profile, to users with whom you have shared your Content. Where this information is sensitive, we urge you to use the various security and privacy features of the Schoolbox Services to limit those who can access such information.

   Access by your system administrator: You should be aware that the administrator(s) or any user granted super user access of your instance of Schoolbox Services may be able to:

   (a) access information in and about your Schoolbox Services account;

   (b) disclose, restrict, or access information that you have provided or that is made available to you when using your Schoolbox Services account, including your Content; and

   (c) control how your Schoolbox Services account may be accessed or deleted.

Schoolbox Community: Our Websites offer publicly accessible community services such as blogs, forums, bug trackers, and wikis. You should be aware that any Content you provide in these areas may be read, collected, and used by others who access them. Your posts may remain even after you cancel your account.

Service Providers, Business Partners and Others: We work with third party service providers to provide application development, hosting, maintenance, back-up, storage, virtual infrastructure, payment processing, analysis and other services for us. These third parties may have access to, or process your Information as part of providing those services for us.

Third party applications: You may choose to make use of third party Add-Ons in conjunction with Schoolbox Services. Third party Add-Ons are software written by third parties to which you grant access privileges to your Content (which may include your PII). When access is granted, your Content is shared with the third party. Third party Add-On policies and procedures are not controlled by Schoolbox even though the third Party Add-On may be available through Schoolbox Services. Third parties who have been granted access to your Content through Add-Ons could use this data to contact you and market services to you, and could share your data with other third parties. Under certain circumstance, Schoolbox Services may bundle in third party products. For example our "Pro" plan includes our Inline Grader and Cheat Checker which utilise the Crocodoc, KAMI and Plagscan third party products respectively. This Privacy Policy does not cover the collection or use of your data by third party Add-Ons, and we urge you to consider the privacy policies governing third party Add-Ons.

Third Party Cookies and Tracking Technologies: When you visit Schoolbox' Websites, third parties such as our advertising partners and analytics providers use cookies, web beacons, and other technologies to collect information about your online activities over time and across different websites or online services. You may be able to opt out of receiving personalised advertisements as described below under "Your Choices." When you use our Hosted Products, we allow our analytics provider to collect the information described above under the heading Analytics Information from Website and Hosted Products. Our analytics provider may collect information about your activities over time and across different online services.

Compliance with Laws and Law Enforcement Requests; Protection of Our Rights: We may disclose your Information (including your PII) to a third party if (a) we believe that disclosure is reasonably necessary to comply with any applicable law, regulation, legal process or governmental request, (b) to enforce our agreements, policies and terms of service, (c) to protect the security or integrity of Schoolbox's products and services, (d) to protect Schoolbox, our customers or the public from harm or illegal activities, or (e) to respond to an emergency which we believe in the good faith requires us to disclose information to assist in preventing the death or serious bodily injury of any person.

Business Transfers: We may share or transfer your information (including your PII) in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

Aggregated or Anonymised Data: We may also share aggregated or anonymised information that does not directly identify you with the third parties described above.

With Your Consent: We will share your PII with third parties when we have your consent to do so.

10. **Information we do not share**

We do not share PII about you with third parties for their marketing purposes (including direct marketing purposes) without your permission.

11. **Data storage, transfer and security**

Schoolbox hosts data with hosting service providers in numerous countries including the United States and Australia.

At the date which this policy became effective, our Hosted Products are securely hosted within the Amazon Web Services (AWS) facility in Sydney, Australia.

This is a state-of-the-art data center that has been independently accredited as compliant with the Australian Government's criteria for information security. As you would expect, the physical security of servers and other infrastructure is tightly controlled according to industry best practice. In addition to a strong security focus, this datacenter has also designed to be resilient to failure, featuring multiple separate power supply systems, independent network links and a range of other measures to ensure servers are always available. You can [read more about using AWS in the context of Australian Privacy Considerations](#).

The servers on which PII is stored are kept in a controlled environment. While we take reasonable efforts to guard your PII, no security system is impenetrable and due to the inherent nature of the Internet as an open global communications vehicle, we cannot guarantee that information, during transmission through the Internet or while stored on our systems or otherwise in our care, will be absolutely safe from intrusion by others, such as hackers. In addition, we cannot guarantee that any passively-collected PII you choose to store in Websites or Hosted Products are maintained at levels of protection to meet specific needs or obligations you may have relating to that information.

In most instances, where data is transferred over the Internet as part of a Website or SaaS Product, the data is encrypted using industry standard SSL (HTTPS). We recommend you always check whether or not the Schoolbox Service is secured via SSL before choosing to transfer your data.

Where On-Premise Products are used, responsibility of securing access to the data you store in the On-Premise Products rests with you and not Schoolbox. We strongly recommend that administrators of On-Premise Products configure SSL to prevent interception of data transmitted over networks and to restrict access to the databases and other storage used to hold data.

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

Other security safeguards include data encryption, firewalls, and physical access controls to our office and files. Access to information is limited (through user/password credentials and two factor authentication) to those employees of Schoolbox who require it to perform their job functions. If we learn of a security systems breach, then we will notify you electronically so that you can take appropriate protective steps. We will also post a notice through Schoolbox Services if a security breach occurs.

12. **Your Choices**

You may opt out of receiving promotional communications from Schoolbox by using the unsubscribe link within each email, or emailing us to have your contact information removed from our promotional email list or registration database. Although opt-out requests are usually processed immediately, please allow ten (10) business days for a removal request to be processed. Even after you opt out from receiving promotional messages from us, you will continue to receive transactional messages from us regarding Schoolbox's Services.

You may be able to opt out of receiving personalised advertisements from companies who are members of the Association for data-driven marketing & advertising (ADMA), the Network Advertising Initiative or who subscribe to the Digital Advertising Alliance's Self-Regulatory Principles for Online Behavioral Advertising. For more information about this practice and to understand your options, please visit: http://www.adma.com.au/consumer-help/do-not-mail-service/, http://www.aboutads.info and http://www.networkadvertising.org/choices/.

13. **Accessing and updating your information**

You can request access to amend some of the information we keep about you by requesting this from us via email.

14. **Compliance with privacy laws and regulations**

You agree not to use the Schoolbox Services in a manner that would violate laws protecting an individual's privacy rights, health or financial data, including the Australian Privacy Act 1988 including the amended Australian Privacy Principles (APPs).

15. **Australian Privacy Principles**

Schoolbox's privacy procedures are in line with the Australian Privacy Principles.

16. **International users**

If you are visiting from the European Union or other regions with laws governing data collection and use, please note that you are agreeing to the transfer of your PII to Australia to us. By providing your PII, you consent to any transfer and processing in accordance with this Policy.

17. **Access to your Information**

You may request a copy of your PII associated with your Schoolbox Services by contacting us using the contact details provided below. We will endeavor to provide you the requested information as soon as possible.

18. **How to contact us**

If you have any questions or concerns regarding our Privacy Policy or need to contact us please use the following options:

- Email: support@schoolbox.com.au
- Telephone: 1300 332 338 (from overseas +61 3 9882 6909)
- Mail: Level 6/697 Burke Rd, Camberwell VIC 3124, Australia.