

# Loop Software Privacy Policy for Daymap's Cloud Services and Apps

Loop Software Pty Ltd (ACN 159 198 366) is committed to ensuring all users' personal and sensitive information is protected. In this policy, **"us"**, **"we"** or **"our"** means Loop Software Pty Ltd (ACN 159 198 366) and its related bodies corporate. This Privacy Policy sets out how we use, disclose and protect any personal information that you provide or that we collect, when you use the Daymap software services and applications, or that we collect directly from you.

Daymap is a software service and application used by schools (**"the School"**) to send and request information to and from various stakeholders (i.e. students, parents, teachers and staff) (hereinafter referred to as **"End Users"**). Through our Daymap Services and Apps we may receive and hold personal information about End Users who register with the Schools' services and app and also the School's contact details to perform business management functions. The School may also use certain services under the Daymap Services and Apps (the **"Services"**) to collect or receive information from its End Users. This Privacy Policy does not apply to the collection, use or disclosure of personal information about End Users by the Schools – we have no control over the School's own privacy practices.

Privacy and confidentiality of personal information disclosed or stored through the Services are of utmost importance to us and we therefore require that the School require that users of the Services adhere to the terms and conditions of use of the Services, and we shall adhere to the privacy policy set forth below. We endeavour to preserve your privacy and confirm that we will not disclose, share, sell or rent personal information other than as described in this Privacy Policy.

By accessing and using the Services (whether as the School or their End Users), you consent to the collection, use and disclosure of your personal information as outlined in this Privacy Policy.

This Privacy Policy sets out:

- what is considered personal information;
- what personal information we hold;
- how we store personal information;
- information collected by the School;
- the purposes for which we collect personal information;
- what happens if we cannot collect personal information;
- how to access and correct your personal information;
- how to lodge a complaint about a breach of the Privacy Policy;
- security;
- whether we disclose personal information outside Australia; and
- changes to our Privacy Policy.

## WHAT IS PERSONAL INFORMATION

When used in this policy, the term **“personal information”** has the meaning given to it in the Privacy Act 1988 (Cth). In general terms, it is any information that can be used to personally identify you. This may include (but is not limited to) your name, age, gender, postcode and contact details (including phone numbers and email addresses). If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

## WHAT PERSONAL AND/OR SENSITIVE INFORMATION DO WE HOLD

The School may request the following personal or sensitive information from End Users of the Services. As the Services are hosted by us, we hold all such collected information on behalf of the School:

- name (and names of your children or children under your care);
- telephone number;
- mailing or street address;
- email address;
- information about students entered by the school.

Also please note that as part of the terms and conditions of use as an End User, you have consented to third parties (i.e. the School placing and/or disclosing personal or sensitive information about you on the Services, which shall be held by us, as the host of the Services. You therefore consent to us collecting, holding, storing and using this information as is reasonably necessary to provide our Services to the School.

## HOW WE STORE PERSONAL INFORMATION

We do not collect personal information, personal information is collected by the School with whom an End User registers. We store information provided through and from a School for their sole use. We do this through your access and use of Daymap and our Services as provided to you from the School with whom you are registered. Users of Daymap provide their personal information to us via the Services login and registration sections. Please note that if the School requests that Daymap is integrated with other service providers (such as payment gateways or bulk-SMS suppliers, the School has requested that we allow the Daymap program to disclose any personal information collected and owned by the School to third party providers. We do not have control over the disclosure, use or handling of any personal information transferred on behalf of Schools to third parties. End Users should discuss this with the School and seek the third party providers' privacy policies.

## **INFORMATION COLLECTED BY THE SCHOOL:**

We treat all information collected from users, by the School, as private to the School. All such information is stored by us securely. How the School chooses to use this information is the responsibility of the School, and End Users should address privacy requirements with the School for a greater understanding of how the School uses the collected information.

## **WHY DO WE HOLD, USE AND DISCLOSE PERSONAL INFORMATION**

The primary purpose for which we hold, use and disclose information about you is to enable us to perform our business activities and functions and to provide best possible Service to the School.

We hold, use and disclose your personal information for the following purposes:

- to provide the hosted Services, which includes allowing the School to:
  - o communicate with you including by email, mail or telephone;
  - o verify your identity;
- to manage and enhance our Services;
- as required or permitted by any law (including the Privacy Act).

Your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy. If we no longer require the use of your personal information, we will take reasonable steps to destroy or permanently de-identify it.

We may also disclose your personal information to:

- our employees, related bodies corporate, contractors or external service providers for the provision of the Services including without limitation IT systems administrators and electronic network administrators, professional advisers and consultants; and
- any relevant authority or enforcement body where we reasonably believe that disclosure is necessary.

## **WHAT HAPPENS IF WE CAN'T HOLD YOUR PERSONAL INFORMATION**

If you do not provide the School with the personal information described in this Privacy Policy, most likely, you will not be able to access or use Daymap and the Services, either to the same standard, or at all.

## **THIRD-PARTY PROVIDERS**

Daymap can be integrated with a range of providers and the School can select their own provider for services like SMS and payment gateways. When the School requests integration to be activated, Daymap will programmatically allow the School to disclose personal information to those third-party services. Any information sent to those services will thereafter be managed by those services. We have no control over what they do with it, it is the School's responsibility to review what services it utilises and mandates to us to integrate with Daymap and to inform their End-Users about this relationship and use. We are not responsible for the information practices of such third party providers.

## **ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION**

As we store your personal information on behalf of the School with who you register your details, we recommend that you contact the School to seek access to and correction of your personal information. If the School cannot or does not provide you with access in a reasonable timeframe, or cannot or does not correct your personal information to a satisfactory level, you may request access to and amendment of, any personal information we hold about you by contacting us (details below). Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it – i.e. by mailing or emailing it to you. We will not charge for making a request and for making any corrections to your personal information. If you make an access request, we will ask you to verify your identity. There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others, or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal. If you require an amendment, we will consider if the information requires amending - if we do not agree that there are grounds for amendment, then we will add a note to the personal information stating that you disagree with it.

## **HOW YOU CAN COMPLAIN ABOUT A BREACH OF THIS PRIVACY POLICY**

If you believe we have breached the terms of this Privacy Policy, or if you have any questions or concerns about our Privacy Policy please, contact us using the contact information below and provide details of any complaint you may have so we can investigate and respond.

We have a formal procedure for investigating and dealing with breaches of this Privacy Policy. Once the Privacy Officer receives a complaint, whether it is in writing or verbal, the Privacy Officer will commence an investigation and endeavour to determine the nature of the breach, if any, and how it occurred. We may contact you during the process to seek any further clarification if necessary. If a breach is found, the Privacy Officer will escalate the matter to management so that the process can be rectified to prevent any further breaches from taking place. We will also contact you to inform you of the outcome of the investigation. We will endeavour to resolve all investigations within a reasonable time.

We will treat your requests or complaints confidentially. Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in a timely and appropriate manner.

Please contact our Privacy Officer at:

Privacy Officer

Loop Software Pty Ltd

Post: Suite 10, 317-321 Whitehorse Rd, Nunawading VIC 3114

Tel: 03 9879 0277

Email: [info@daymap.net](mailto:info@daymap.net)

## **NO DISCLOSURE OF PERSONAL INFORMATION OUTSIDE AUSTRALIA**

We do not, and do not ever intend to disclose personal information outside of Australia. Daymap is hosted in Microsoft Azure Australian Data Centre, a cloud computing platform with a collection of integrated services including database, storage and web. Daymap is stored and replicated in primary and secondary Azure regions in Australia.

For the avoidance of doubt, an End User may access their own information via the Services from outside of Australia. As noted above, End User Personal Information belongs to the School, as such the School's authorised representatives may freely access, view and download any End User information belonging to them, and we have no control over their collection, use or disclosure of this information whether in Australia or overseas.

## **SECURITY**

Whilst we cannot guarantee against any loss, misuse or alteration to information, we will take reasonable steps to ensure the security and confidentiality of the personal information that we hold from loss, misuse, alteration or unauthorised access, including by means of firewalls, password access and secure servers.

Please also note that it is our policy for all of our staff to undergo National Police Checks, sign confidentiality agreements for non-disclosure, use or mishandling of any information stored or held by us. We have strict internal policies in place regarding the handling and protection of sensitive data. Additionally, where considered appropriate staff have undergone criminal screening via various state authorities (i.e. VIC: Working with Children Check, SA: DSCI Screening and other state equivalents).

If you suspect any misuse or loss of, or unauthorised access to, your personal information, please let us know immediately.

## **CHANGES TO OUR PRIVACY POLICY**

We may change this Privacy Policy from time to time in our sole discretion. Any updated versions of this Privacy Policy will be posted on our Daymap website and highlighted to you upon your next sign-in and use of the Services. Please refer to this page from time to time to review any changes to this Privacy Policy. Your continued use of Daymap and our Services following the postings of changes to this Privacy Policy means you accept these changes. This Privacy Policy was last updated in May 2016.