



## FAMILY ZONE PRIVACY POLICY EDUCATION

<b>1</b>	<b>INTRODUCTION</b>	<b>2</b>
<b>2</b>	<b>CONSENT</b>	<b>2</b>
2.1	Your Consent	2
2.2	End User Consent	2
<b>3</b>	<b>OUR COMMITMENT TO PROTECTING CHILDREN &amp; STUDENT INFORMATION</b>	<b>2</b>
<b>4</b>	<b>THE INFORMATION WE COLLECT AND WHY</b>	<b>3</b>
4.1	Your information when we register you	3
4.2	End-User accounts and Device registration information	3
4.3	Parent accounts and registration information	3
4.4	Cyber Safety Family Zone Services related information	3
4.5	Use of our websites, Family Zone Services and customer support	3
4.6	Feedback, suggestions, survey responses and forums	4
4.7	Information collected from Third parties	4
4.8	Sensitive Information	4
<b>5</b>	<b>USE OF AND SHARING PERSONALLY IDENTIFICABLE INFORMATION (PII)</b>	<b>4</b>
<b>6</b>	<b>THIRD PARTY SERVICES</b>	<b>4</b>
<b>7</b>	<b>FACILITIES AND DATA TRANSFER</b>	<b>5</b>
<b>8</b>	<b>COMMUNICATING WITH YOU</b>	<b>5</b>
<b>9</b>	<b>SECURITY PROCEDURES</b>	<b>5</b>
9.1	Our Security Procedures	5
9.2	Your Security Procedures	5
<b>10</b>	<b>DATA BREACHES</b>	<b>5</b>
<b>11</b>	<b>SPAM</b>	<b>5</b>
<b>12</b>	<b>TRACKING TECHNOLOGY</b>	<b>6</b>
<b>13</b>	<b>SOCIAL ACCOUNTS ACCESS</b>	<b>6</b>
<b>14</b>	<b>RIGHT TO ACCESS, UPDATE OR CORRECT YOUR INFORMATION</b>	<b>6</b>
<b>15</b>	<b>DO NOT TRACK</b>	<b>6</b>
15.1	Do Not Track Browser Preferences	6
15.2	Do Not Track Settings in our Family Zone Services	7
<b>16</b>	<b>DATA RETENTION</b>	<b>7</b>
<b>17</b>	<b>CHANGES TO THIS POLICY</b>	<b>7</b>

## 1 INTRODUCTION

---

We are committed to protecting the privacy of end users and in particular, your students. This Privacy Policy describes how we collect, store, use and distribute information through our software and related Family Zone Services (together, the “Family Zone Services”). Unless otherwise specified, for the purposes of this Privacy Policy, “you” and “your” refers only to the education provider. End User refers to your staff, students or any other user of our Family Zone Services.

In this Privacy Policy:

- (a) **You:** You are the educational institution / provider.
- (b) **End Users:** These are staff or students whom access your network and have their internet and other device activity affected by our Family Zone Services.
- (c) **Parents:** This refers to parents and guardians of your students. Our Family Zone Services permit you to work with Parents collaboratively in cyber safety and accordingly we (subject to agreement with you and them) register and communicate with them.
- (d) **Family Zone Marketing Purposes:** Information is said to be used or collected for marketing purposes where it enables us to provide recommendations to you where we believe Products or Family Zone Services will be of interest to you.
- (e) **Operational Purposes:** Information is said to be collected for Operational Purposes where it allows us to:
  - (i) Make the Products you have requested from us available to you.
  - (ii) Bill you, deliver Product to you and get in contact with you when reasonably required.
  - (iii) Enforce our Agreement.
  - (iv) Respond to enquiries and requests.
  - (v) Supporting our efforts to monitor the performance of and constantly enhance our Family Zone Services.
- (f) **Partners:** Are providers of Products or Family Zone Services which we believe will be of interest to our customers.
- (g) **Partner Marketing Purposes:** From time to time in conjunction with Partners, we may send promotional announcements and/or serve web-based advertisements on their behalf, as permitted by law. Information is said to be used or collected for Partner Marketing Purposes where it enables us to provide recommendations to you relating to Partner Products or Family Zone Services.
- (h) **Operational Service Providers:** Means Third Party companies, agents or contractors that are engaged by us directly or indirectly to assist us in providing the Products to you. For example, Family Zone Services Providers assist us in delivering marketing and communications, providing infrastructure and IT Family Zone Services, delivered Products, processing payments, provide Customer Support, collecting debts, analyse and enhance data and so on. For the purpose of this Privacy Policy, Service Providers includes our Cyber Experts.

## 2 CONSENT

---

### 2.1 Your Consent

By using our Family Zone Services, you consent to the collection and use of Personally Identifiable Information of your End Users as described in this Privacy Policy. Except as set out herein, the Personally Identifiable Information of your End Users will not be used for any other purpose without your consent. We do not collect Personal Identifiable Information for the purpose of sale of such information in any way. You may withdraw your consent to our processing of the Personally Identifiable Information of your End Users at any time however we may be then unable to provide you or them with some or all of our Family Zone Services.

### 2.2 End User Consent

Our Service provides you with the ability to access, monitor, use, or disclose data associated with your End Users. With respect to End Users that are not managed by accounts other than yours (for example staff or school managed students) you undertake to obtain and maintain all required consents from End Users to allow: (i) access, monitoring, use and disclosure of this data and for us to provide the Family Zone Services and this data.

## 3 OUR COMMITMENT TO PROTECTING CHILDREN & STUDENT INFORMATION

---

We are committed to operating in compliance with the USA Family Education Rights and Privacy Act (“FERPA”) and the Children’s Online Privacy Protection Act (“COPPA”) and the Australian *Privacy Act* 1988 (Cth) in all applicable respects with regards to the collection, use, disclosure, and retention of the Personally Identifiable Information of minors.

We have also taken the Student Privacy Pledge introduced by the Future of Privacy Forum (FPF) and The Software & Information Industry Association (SIIA).

Please note, that as an education provider, you will have different obligations to us with respect to Personally Identifiable Information. Please consult with your own legal counsel to ensure your compliance with applicable federal and state laws, as we do not take any responsibility for your failure to comply with the requirements of FERPA or COPPA.

We undertake to not market to children (under 18).

## 4 THE INFORMATION WE COLLECT AND WHY

---

### 4.1 Your information when we register you

## FAMILY ZONE PRIVACY POLICY EDUCATION

When you sign up with us we will ask for personal information to enable us to establish an account. This will include name, email address, service location, address (if you order Products from us), payment method (such as a credit card), username and security information such as a password, PIN and secret question/answer.

As described in our Standard Terms we may also capture information about your organization including company/trust/association details and director's details.

### 4.2 End-User accounts and Device registration information

When you register End Users we will ask for personal information to enable us to establish their user account. This will include name, date of birth and security information such as a PIN and information about their role in your school or class. We may also capture user/student identifiers to assist you and us integrate our Family Zone Services with yours.

When devices such as tablets and personal computers connect to our Family Zone Services we ask for information to be registered for the device such as device type, a device name and for its End-User to be identified.

As you or your End Users connect to the Products (eg access points, gateways network appliances) an authentication process will be triggered. Device and/or authorisation tokens/certificates or a sign-in will allow our Family Zone Services to identify End-User – which is fundamental for the operation of our Service.

We require this information for Operational Purposes and Family Zone Marketing purposes. It enables us to identify you, your End Users and their devices and for us to support you. Without this information our Service cannot be provided.

### 4.3 Parent accounts and registration information

When you register End Users you may choose to require that they be associated with accounts held by their Parents. In such circumstances we will require you to either:

- (a) provide us with basic sign up information for them (ie parent names, date of birth, contact details) so we can pre-create temporary accounts for them; or
- (b) provide us with their contact information so we can direct them to online sign up processes.

When we pre-create temporary accounts, we capture the minimal information necessary to permit us to identify them and ensure a smooth set up. We require Parents to set up security settings and verify themselves during the account activation process.

### 4.4 Cyber Safety Family Zone Services related information

Our Family Zone Services enables you and Parents to control End User's use of the internet and devices. To do so we necessarily monitor and track usage and related personal and device information (Cyber Safety Data). This includes:

- ✓ Use of the internet including online search terms, sites visited and blocked and related information such as device, protocol, website, location, time & date.
- ✓ Use of applications including what applications are installed or attempted to be installed, are used and for how long, are blocked or permitted to be used and related information such as device details, location, time & date.
- ✓ Use of device features including what feature is being used and for how long and related information such as device, location, time & date.
- ✓ Geo-location information derived from GPS or other technology or from IP addresses.
- ✓ Use of calling and messaging features of devices including a and b-party details and related information such as device, location, time & date.
- ✓ Data, text, graphics, video, messages or other materials which has been transmitted, distributed, displayed, or shared using our Family Zone Services.
- ✓ Other End User actions or patterns of actions eg violation of our Family Zone Services.
- ✓ Diagnostic information such as crash reports and system logs which may capture device details such as operating system version, Family Zone Hardware, and browser version and any information associated.

We may offer you and you may opt-in to advanced cyber safety and security technology that permits us to intercept messaging traversing the school's network. In such circumstances such messaging will also be captured and managed in accordance with this Privacy Policy.

#### Your Access to Cyber Safety Data

Please note you will be able to view Cyber Safety Data associated with your End Users where:

- ✓ The related activity occurs on a Service owned by you; and
- ✓ Otherwise where the relevant End User's Parent has opt-in to provide you with this access.

### 4.5 Use of our websites, Family Zone Services and customer support

In using our Websites and Family Zone Services we will track information on your use of our Family Zone Services. For the purpose of providing you with a quality Service we maintain an activity log for you and your End-Users (and your devices) use of our Family Zone Services. Information collected includes:

- ✓ Use of our websites, customer portals and mobile apps.
- ✓ Use of the Products including updates.
- ✓ Logging the operational activity of the Products such as the running of updates, connection of users etc.
- ✓ Subscriptions, purchasing, invoice and payment history.
- ✓ Orders of Products including delivery address and contact information.
- ✓ Correspondence with us.

### 4.6 Feedback, suggestions, survey responses and forums

## FAMILY ZONE PRIVACY POLICY EDUCATION

While using our Family Zone Services, you and End Users will have opportunities to post comments or other information in public forums. This information is by its nature public and unsecured. We are not responsible for any Third Party use of information you publicly disclose through our Service.

Further terms such as copyright relating to any information you post or otherwise provide to us are described in our Customer Terms.

### 4.7 Information collected from Third parties

For Operational Purposes we may collect information about you from Third Parties including from:

- ✓ Credit reporting agencies.
- ✓ Law enforcement other government entities.
- ✓ Our Service Providers and Partners.
- ✓ Searches of publicly available information including social networks.

### 4.8 Sensitive Information

Certain legal jurisdictions define Sensitive Information and prescribe rules around its capture, storage and use. For the purpose of this Privacy Policy we define Sensitive Information to mean information or an opinion about an individual's:

- ✓ racial or ethnic origin.
- ✓ political opinions.
- ✓ membership of a political association.
- ✓ religious beliefs or affiliations.
- ✓ philosophical beliefs.
- ✓ membership of a professional or trade association.
- ✓ membership of a trade union.
- ✓ sexual preferences or practices.
- ✓ criminal record.

Unless permitted within your jurisdiction and either necessary for the provision of our Family Zone Services or permitted by you we will not record or use Sensitive Information.

## 5 USE OF AND SHARING PERSONALLY IDENTIFIABLE INFORMATION (PII)

---

**Operational Purposes:** We will share your and your End-User PII among any of our related companies and organisations and to any Service Provider for Operational Purposes.

**Third Party Marketing Purposes:** We will not sell your or your End User's personal information to Third Parties. We may however (subject to your opting out) direct partner organisations to you for the purpose of offering you what we reasonably consider to be complimentary Products or Family Zone Services. We will endeavour to work with reputable partners, however you acknowledge that we do not control their privacy practices.

**Marketing to Parents:** We will not directly market to Parents associated with your End Users without permission from you, them or another valid source.

**Hot-spotting:** Once registered for our Service, devices can be recognised by participating network gateways. We will share your End-User's masked names (first name and first initial of last name) and device identification information where they connect to participating networks.

**Exceptions:** We reserve the right to disclose PII if we reasonably believe that access, use, preservation or disclosure of such information is reasonably necessary to (a) satisfy any applicable law, regulation, legal process, or governmental request, (b) enforce applicable Customer Terms or our Agreement, including investigation of potential violations or breaches, (c) detect, prevent, or otherwise address illegal or suspected illegal activities, security or technical issues, or (d) protect against harm to the rights, property or safety of us, our users or the public as required or permitted by law. Further, in connection with any restructuring, merger or sale, or other transferring of assets we reserve the right to transfer all customer and End-User & Device information, including PII, to the receiving party. We will do so provided that the receiving party agrees to respect your personal information in a manner that is consistent with our Privacy Policy until such time as they properly change these terms or obtain your approval to change them.

## 6 THIRD PARTY SERVICES

---

Our Family Zone Services may be provided through platforms or contain links to sites operated by Third Parties whose policies regarding the handling of information may differ from ours.

While we endeavour to associate with reputable companies, we cannot be responsible for the information handling practices of these other websites and platforms. These websites and platforms have separate and independent privacy statements, notices and customer terms, which we recommend you read carefully.

In using the Products & Family Zone Services you may encounter Third Party applications (e.g. widgets and utilities). These technologies may import data related to your Family Zone account and activity and otherwise gather data from you. These applications are provided solely as a convenience to you. We are not responsible for them and your use or acceptance of them is at your own risk.

While using the Products & Family Zone Services, you or your End-Users will access websites and apps owned or operated by Third Parties. We are not responsible for their privacy policies and practices.

## 7 FACILITIES AND DATA TRANSFER

---

The Internet is a global environment and our Family Zone Services are deployed globally.

We undertake that our facilities and processes to store and process Customer Data will adhere to reasonable security standards.

We endeavour to store and process Customer Data in the country within which you are located (Locally), from time to time however this will not always be possible.

By using our Family Zone Services, you acknowledge and agree to the transfer of your information outside your country of residence to any country (including the United States) where we have facilities or engage third parties (including but not limited to payment processors, cloud service or other IT providers and other companies that provide Family Zone Services to us). You acknowledge that the countries to which we may transfer information may not have as comprehensive a level of data protection as in your country.

## 8 COMMUNICATING WITH YOU

---

By using any of our Family Zone Services, including our website and user interfaces, or providing information to us through any means, you agree that we can communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the Products & Family Zone Services.

## 9 SECURITY PROCEDURES

---

### 9.1 Our Security Procedures

We take information security seriously and use reasonable administrative, technical, physical and managerial measures to protect your personal information from unauthorized access. For example:

- ✓ We utilize Secure Sockets Layering to encrypt communication between us.
- ✓ We do not store your payment information, instead we use a Third Party payment provider to store your payment data encrypted through PCI-DSS.
- ✓ We require you to provide a unique username and set a password and other security measures from time to time such as PINs and secret questions/answers.
- ✓ We hold passwords encrypted and cannot re-issue these (instead you must enter a new one).

### 9.2 Your Security Procedures

We urge you to be diligent in securing your computing networks, devices, usernames and passwords. Should other parties obtain access to these or guess them (because they are too simple) then you may be compromised.

For convenience we make certain technologies available to you to make it easier to log in to your account or be authenticated to access the network or internet. For example, cookies, remember-me and single-sign-on type technologies. If you use these then we urge you to implement device PINs and to log off your device when you're not using it.

If you intend to sell or return a device which you have used with us you should remove our application/s, log-out and clear the cache, all browsing info and cookies before doing so.

You are responsible for maintaining the confidentiality of your account access information and for restricting access to your computer or device through which you access your Family Zone account.

## 10 DATA BREACHES

---

We are committed to transparency with respect to serious data breaches. We undertake to comply with the Australian Notifiable Data Breaches (NDB) scheme set out in Part IIIC of the Privacy Act 1988 (Privacy Act).

Under this scheme where a data breach occurs which is likely to result in serious harm to any individuals whose personal information then we will notify the relevant affected individuals (and other parties as required by law) and advise:

- ✓ Our identity and contact details.
- ✓ A description of the data breach
- ✓ The kinds of information concerned; and
- ✓ Recommendations about the steps the individual should take in response to the data breach.

## 11 SPAM

---

SPAM is a common term for unwanted commercial electronic messages including emails, short messages and so on. In various countries around the world there are laws designed to inhibit the use of SPAM by commercial organisations.

- ✓ We do not engage in SPAM.
- ✓ We will not use false, or misleading subjects or email addresses.
- ✓ We will identify marketing messages as such in a reasonable way.
- ✓ We will include our registered address.
- ✓ We will monitor Partner Marketing for compliance.
- ✓ We will honor opt-out/unsubscribe requests in reasonable timeframes.
- ✓ We will provide opt-out unsubscribe options in relation to Partner Marketing.

## 12 TRACKING TECHNOLOGY

---

We use Tracking Technologies. These may include:

- (a) Cookies: These are small pieces of data that are stored on your computer, mobile phone or other device.
- (b) Pixels: These are small blocks of code on web pages that do things like allow another server to measure viewing of a webpage and often are used in connection with cookies.
- (c) Local Storage: Like pixels and cookies but hold more data.

We may choose to use other Tracking Technologies which perform similar functions such as Web Beacons, Clear Gifs and Plugins (e.g., HTML5, IndexedDB, WebSQL and Silverlight storage). Like cookies, some of these technologies may store small amounts of data on your device.

We use these technologies to do things like:

- ✓ make our Websites and Family Zone Services easier or faster to use;
- ✓ enable features and store information about you (including on your device or in your browser cache);
- ✓ deliver, understand and improve Family Zone and Partner Marketing;
- ✓ monitor and understand the use of the Products; and
- ✓ protect you, others and us.

We may ask advertisers or other partners to serve ads or Family Zone Services to computers, mobile phones or other devices, which may use a cookie, pixel or other similar technology placed by us or the Third Party (although we would not share PII without your permission).

You should refer to your browser or device's help material to learn what controls you can often use to remove or block cookies or other similar technologies or block or remove other data stored on your computer or device (such as by using the various settings in your browser). If you do this, it may affect your ability to use our Family Zone Services.

## 13 SOCIAL ACCOUNTS ACCESS

---

We may permit you to connect your Family Zone account to your accounts in social media such as Facebook, Twitter or Google +.

If you connect your Family Zone account to a social network account, you may be able to take advantage of a variety of social features, including sending recommendations to friends and sharing with them automatically.

Please be aware that by choosing to connect your Family Zone account to a social network account or to use our social features, you consent to the collection, use and sharing of information about you (which may in some cases include sharing what Family Zone Services you use) with us and others.

We may provide and modify from time to time controls over what you share of your Family Zone Services activity.

You can disconnect your social network through your relevant social network.

## 14 RIGHT TO ACCESS, UPDATE OR CORRECT YOUR INFORMATION

---

The applicable laws of your country may give you the right to contact us to update, correct and request removal of inaccurate personal information we have about you or your End-Users.

You can review the account registration information you have provided to us and make any desired changes to the information, or to the settings for your Family Zone account, at any time by logging in to "Your Account" on the Family Zone website and editing the information on your profile page or your End-User's profile page(s).

If you close your Family Zone account, we will not automatically remove your name or other personally identifiable information from our database.

If you have a question regarding our privacy practices or want to exercise your rights regarding your personal information, please contact us through our website.

## 15 DO NOT TRACK

---

### 15.1 Do Not Track Browser Preferences

Do Not Track (or DNT) is a preference you can set in your browser to let the websites you visit know that you do not want them collecting certain information about you.

For more details about Do Not Track, including how to enable or disable this preference, visit this [Do Not Track webpage](#).

Our websites and web apps do not respond to Do Not Track settings. However, we only use Tracking Technology to provide, communicate, enhance and optimise our Family Zone Services for you and your End-Users.

Given their function our parental control Family Zone Services do not respond to Do Not Track settings. Furthermore, your End-Users may access internet sites that use Tracking Technology. We cannot control the DNT policies of these Third Parties.

### 15.2 Do Not Track Settings in our Family Zone Services

We do offer you the ability to not track Users as a setting in our Family Zone Services. These settings are typically for adult users of our Family Zone Services and when selected, as much as practically or legally possible we don't retain Cyber Safety Data.

## 16 DATA RETENTION

---

We will keep Personally Identifiable Information only for as long as it remains necessary for the identified purpose or as required by law, which may extend beyond the termination of our relationship with you.

We may retain certain data as necessary to prevent fraud or future abuse, or for legitimate business purposes, such as analysis of aggregated, non-personally-identifiable data, account recovery, or if required by law.

Please note that if you request that Personally Identifiable Information be removed from our databases, it may not be possible to completely delete all Personally Identifiable Information due to technological and legal constraints (such as if their Personally Identifiable Information appears in another student's Data).

All retained Personally Identifiable Information will remain subject to the terms of this Privacy Policy.

Notwithstanding the foregoing, Personally Identifiable Information belonging to students will be deleted in all cases (to the extent that it is reasonably and commercially possible to do so) when it is no longer needed for the purpose for which it was collected.

Our standard policy is to store Cyber Safety Data for 30 days. After that time related records are aggregated and anonymised. We MAY offer you the option to extend this storage period. For the purpose of quality assurance or due to technical limitations we may capture temporal Cyber Safety Data when End Users have set to be "not tracked". We will however purge such data as soon as practical.

## 17 CHANGES TO THIS POLICY

---

We may, from time to time, make changes to this Privacy Policy. Such revisions shall be effective immediately, provided however for existing members, such revisions shall unless otherwise stated, be effective 30 days after posting.

We will endeavour to post prior versions (or marked changes) of the Privacy Policy, if any, for the preceding 12-month period. You can see these prior versions of the Privacy Policy by visiting our website.