



Privacy Policy

1. General Statement

1.1 Skodel Technology Pty Ltd (**Skodel**) respects the privacy of all individuals and, most notably, students. This privacy policy outlines Skodel’s approach to privacy and how Skodel collects, stores, uses and protects your personal information. It also sets out your rights in relation to accessing the personal information we collect and hold about you. We are bound by the National Privacy Principles in the *Privacy Act 1988* (Cth).

If you are under the age of 18, please be sure to read this Privacy Policy with a parent or guardian.

- We abide by all Australian Privacy Principles outlined in the Privacy Act.
- Skodel and the services it provides to Educational Agencies comply with applicable provisions of law, including the Family Educational Rights and Privacy Act (“FERPA”), COPPA, CSPP, GDPR and equivalent federal and state laws.
- We are committed to creating a safe and secure online environment for our users.
- We will never sell your personal information to third parties.
- We take the protection of your personal information very seriously, using the best of modern technology feasible for us to protect data and restrict unauthorised access to that information.

1.2 Personal information is defined in the *Privacy Act 1988* (Cth) and means information or an opinion about an individual whose identity is apparent or can be reasonably ascertained from that information or opinion.

1.3 Our website may contain links to third party websites. We are not responsible for the privacy policies of any third party websites. We recommend that you review the privacy policy of each website you visit.

2. Collection of Personal Information

2.1 Skodel only collects personal information for the purposes of supplying services to you. The personal information Skodel collects may include:

a) Information you provide us with:

We collect and store any information you knowingly provide us with when using our services, whether that be on mobile, computer or any other means. That information may include, without limitation, personal information such as your name, email address, school affiliation, telephone number, address and any other information necessary for us to provide our services.

b) Information other users provide us with:

We may collect information other users provide us about you, which can include personal information. This is generally the case when a teacher, school or parent provides us with personal information about their students or children in order to create an account with Skodel. Refusing to provide certain information will result in not being able to access service.

c) Information collected automatically:

We collect and store certain types of usage information when you interact with our services. This information is not personal information. We collect usage information about things such as questions answered, time spent answering questions, order in which you select responses, the number of questions completed and trend over time in negative, neutral or positive emotions stated.

d) Information from integrated services:

To make it easier and save time for students and teachers, Skodel allows for single-sign-on (SSO) for various platforms. If you choose to login through SSO or otherwise via an integrated service such as Google, Microsoft or other learning management system (LMS), then Skodel may collect personal information that is already associated with your integrated service account. By choosing to provide such information, you are giving Skodel permission to use, share and store it in a manner consistent with this Privacy Policy.

e) Location information

We collect information about which state or country you are in to tailor our question format to your location.

2.2 Skodel will only collect personal information from you by lawful and fair means and not in an unreasonably intrusive way.

3. Using and Disclosing Personal Information

3.1 We will generally use or disclose your personal information only for the primary purpose for which it was collected; or for a related secondary purpose where you would reasonably expect us to use or disclose the personal information for that secondary purpose. We may otherwise use and disclose your personal information if you have given us consent for the use or disclosure or it is required or authorised by law.

3.2 Generally, we use and disclose your personal information for the following purposes:

a) To provide a service to you

Skodel uses information to be able to provide our services to you. For example, to create a Skodel account, we may need to collect personal information such as name and email address.

b) To enhance the services we provide

Skodel uses the personal information to better the service we provide you. We collect and store relevant data when students complete check ins on our platform, so that we can provide educators, students themselves and parents with relevant insights into the wellbeing of each student and effectiveness of wellbeing programs within the school. An example of this is how we store previously stated emotions on check ins to provide teachers with meaningful insight into progression or regression.

c) As testimonial

Under certain circumstances and only with consent from you, we may post your personal information on our website. This would only include your name, title and what you have said about our services. We may also collect anonymous survey data relating to how likely you are to recommend Skodel. This would be aggregated and may be published on our website as a percentage figure.

d) School ownership of data

Schools will be able to download a CSV file with all student activity. This data is owned by the school and will continue to be the property of and under the control of that school.

e) Shared with other users

Skodel shares certain information with other users to allow teachers within a school to work together seamlessly. An example of this is the development of successful intervention strategies - these are made available for other teachers within the same school.

f) Retaining data

Student accounts can only be deleted by teacher accounts. When a student account is deleted, all the data is deleted with it, however, we may hold the data on our backup databases for a period of up to 90 days. After 90 days, all information from the deleted account will be removed from our database. Teachers can delete their accounts at any time. You have the right to request that our company restrict the processing of your personal data, under certain conditions.

g) Understand usage

Skodel automatically collects and stores information on our server logs from your browser, including Skodel cookie information, your IP address and pages visited. Cookies are alphanumeric identifiers that we transfer to your computer or mobile device. These are transferred, whether you are a registered member or not and are used to help us gain an understanding of how our users are using our services. This enables us to tailor your own experience and create a better experience for our other users. If you wish to change your cookie settings, you can do so but this is dependent on the browser you are using, so we suggest looking at the 'help' section for the browser you are using. For more information on cookies, we recommend visiting Google AdSense. For more information about cookies, please visit allaboutcookies.org.

h) Types of cookies we use

We use the following types of cookies for the purposes explained below:

1. Essential Operational. These cookies are necessary to allow us to operate Skodel as you have requested. For example, they let us recognise what type of user you are and then provide you with services accordingly.
2. Performance and Analytics. We use these cookies to analyse how Skodel is accessed, is used, or is performing. We use this information to maintain, operate, and continually improve Skodel. We may also obtain information from our email newsletters, including whether you opened or forwarded a newsletter or clicked on any of its content. This information tells us about our newsletters' effectiveness and helps us ensure that we're delivering information that you find informative.
3. Functional. These cookies let us operate certain functions of Skodel in line with the choices you make. These cookies mean that when you continue to use or come back to Skodel, we can provide you with our services as you have asked for them to be provided, such as knowing your username, remembering how you have customised our services, and reminding you of content you have recently viewed.
4. Third Party. We may allow our business partners to use cookies on or outside the Skodel Service for the same purposes identified above, including collecting information about your online activities over time and across different websites. We may also use service providers acting on our behalf to use cookies for the purposes identified above.

i) **Assist with fixing bugs and customer issues**

We use a variety of third-party services to help with bug detection, understand usage and monitor server performance. Such services include Google Analytics and we may share certain information with these providers to assist in identifying and fixing bugs, customer support and improving our services. Except for the purposes provided in this Privacy Policy, Skodel will not disclose the information we collect from you to third parties without your express written permission, or where we believe, in good faith, that the law requires us to disclose the information.

j) **Marketing and or potential investors**

To assist in running more effective marketing campaigns or raising capital, we may share aggregated information with marketing professionals or potential investors. Students will remain **anonymous**. We store session information on our website, such as the pages you viewed, for the purposes of re-marketing to potential customers. This information remains anonymous and we will never knowingly advertise to existing school users in this manner.

We may market to potential clients if you have opted in to receive marketing, you can opt out at a later date. You have the right at any time to stop our company from contacting you for marketing purposes.

k) **We may share data when legally required or to protect Skodel or others**

Skodel may disclose personal information when required by law. We may also disclose information, in good faith, to protect Skodel from third party allegations or to protect the property or safety of our users.

4. Security of your personal information

Data and information security is a priority for Skodel and we have gone to great lengths to ensure our systems are secure and your information is protected. We take steps to protect the personal information we hold against loss, unauthorised access, use, modification or disclosure and against other misuse. This includes the use of services from respected cyber security professionals. When no longer required, personal information is destroyed in a secure manner or deleted.

4.1 Protecting your personal information

Your personal information on your Skodel account is protected by a password set by you for your privacy and security. Selecting and protecting a more secure password will help prevent the threat of unauthorised access.

On top of this, we also have in place a number of physical and technical security measures to help prevent the threat of an attack on our own services. Whenever you enter sensitive information on our website, we encrypt the transmission of that information using a secure socket layer (SSL). We endeavour to protect all your information in order to keep this private, however, no transmission of information through web services can be guaranteed to be 100% secure. Given this, we cannot guarantee the security of your information and any information you do provide Skodel which is done so at your own risk. In a case where your information may be compromised, you will be notified electronically. In addition to the restrictions discussed in this Privacy Policy, our employees are required to comply with information security safeguards, and our systems are protected by technological measures to help prevent unauthorized individuals from gaining access. Skodel employees undergo background checks and are trained to observe and comply with applicable federal and state privacy laws in the handling, processing, and storage of your information.

Skodel uses [Google Cloud](#) to host our web application and store data, including personal data, in encrypted formats. Laws on data protection differ from country to country, so be aware that if you are not based in the USA and provide us with information, your data will be transferred to the USA, which may have different data protection laws.

4.2 What happens in the event of a data breach

In the event of a data breach, Skodel will adhere to the applicable Federal and/or State data breach regulations of the impacted user(s). Upon discovery or notification of any unauthorised access disclosure, Skodel will take immediate measures to safeguard and prevent further dissemination of any personal information.

When reasonably able to do so, Skodel will notify the impacted parties via contact information on record, with information including but not limited:

- Company contact information.
- A general description of the breach incident.
- An explanation, to the best of our knowledge, of what happened.
- A listing of the types of personal information that is believed to be compromised.
- If known, the date and time of the breach, or a best estimate.
- Whether the notification was delayed as a result of law enforcement.
- What steps the Company has taken to mitigate the situation, prevent it from happening again, and advice to the impacted individuals on how they can best protect themselves.

4.3 What happens in the event of a bankruptcy, sale or merger?

In the unlikely event that Skodel goes out of business, or files for bankruptcy, we will protect your personal information, and will not sell it to any third-party.

5. Access to Your Personal Information

5.1 What personal information can I update and or view?

Skodel acknowledges an individual's right to access and update their personal data. You can access and update much of this personal information in your account settings online. If you are after other personal information that is not accessible to you, you can contact us and we will look into this matter. There may be cases where we are unable to release certain personal information to you and in such cases, you will be given the reasons as to why. If you feel certain

personal information is not correct and you are unable to update it, you can contact us and we will investigate such cases.

6. Changes to the Privacy Policy

We may make changes to this Privacy Policy from time to time for any reason. In such cases where changes diminish the privacy rights of our users, we will notify users via email before the changes go into effect. Please ensure the email attached to your Skodel account is valid and you are able to receive email, otherwise, you will not receive information on such updates.

Want to make a complaint or ask a question?

If you feel we have not been compliant with this Privacy Policy, are unhappy with the way we handle personal information or would like to ask a question, you can contact us at any time and we will respond within a reasonable period of time. Every complaint is taken seriously and we will do our best to resolve such issues. In cases where we are unable to do so, there are additional steps you can take if you wish to escalate the matter and we will advise you on this.

Contact us at info@skodel.com

[Tel: \(02\) 9327 8696](tel:(02)93278696)

[Address: Suite 8, Level 2, 1 McLaren St North Sydney, NSW 2060, Australia](#)

If you are based in the United States of America and wish to file a complaint or ask a question, then please contact iKeepSafe via the following email address COPPAPrivacy@iKeepSafe.