



## Acapella Privacy Policy

We acknowledge and value your privacy and understand the importance of keeping your personal information secure. This Privacy Policy explains in plain language how we collect, store, use and remove the information that you provide us.

This policy covers the use of Acapella's websites, the Acapella Read application and other services that may be provided by Acapella. In the rest of this document, we will use the term '**Services**' to mean these services and products individually and collectively as is appropriate in the context.

Acapella is committed to protecting the safety and security of our registered users including: students, teachers, school administrators and parents. We are sensitive to concerns about the safety of the personal information provided to us. In the rest of this document, we will use the term '**Registered Users**' to mean these users individually and collectively as is appropriate in the context.

## Consent for the collection of personal information

Each time you access our Services as a Registered User you give Acapella your explicit consent which allows us to collect personal information about yourself and other Registered Users. The information we collect allows us to:

- perform our obligations under our agreement(s) with the Registered Users;
- to communicate to parent or teacher Registered Users, including to provide updates about the Services, newsletters, general and marketing information about our events, products and services; and
- to comply with applicable laws, rules and regulations.

When a **school** creates an account with Acapella, the school's nominated executive gives Acapella the school's explicit consent on behalf of its staff and students which allows us to collect personal information about each person who is or becomes a Registered User and who is associated with the school account.

When a **professional consulting practice** (for example, a speech pathology practice) creates an account with Acapella, the consultancy's nominated executive gives Acapella the consultancy's explicit consent on behalf of its staff which allows us to collect personal information about each person who is or becomes a Registered User and who is associated with the consultancy account.

When a **parent** creates an account for their family with Acapella, they give Acapella the family's explicit consent which allows us to collect personal information about each person who is or becomes a Registered User and who is associated with the family account.

Each time a Registered User logs in to the Services they explicitly renew their consent to Acapella. If they do not consent at login or they do not agree to the Terms and Conditions they must not use the Services.

Acapella does not allow anonymous access to any Services, except that visitors to our public website may remain relatively anonymous until they login.



## What personal information do we collect?

We collect personal information to provide Registered Users our Services. The kinds of personal information we collect depends on how you interact with us.

When you contact us for any reason prior to becoming a Registered User and after you become a Registered User, we may collect information about you, including:

- your name;
- your contact details, including your email address and phone number;
- your state and country of residence;
- your school (if applicable);
- details of other interactions that you have with us or the Services, together with any other information that you choose to provide (e.g. enquiries or interactions with our customer and technical support teams).

If you are a **Registered User working in a school**, we may collect additional information about you, including:

- the name and location of the school;
- your role in the school;
- the name of your class(es).

If you are the **parent of child who uses our services**, we may collect additional information about you, including:

- links to your child, their school, and any relevant professional services;
- links to other members of your family group who may interact with our services;
- credit or debit card details (managed and stored by a third party provider).

If you are a **child who uses our services**, we may collect additional information about you, including:

- your date of birth;
- the postcode, State and Country of your home;
- the postcode, State and Country of your school(s);
- details of your disabilities as far as they impact on your reading, general learning ability and/or your physical ability to respond to software instructions or requirements;
- data from Aacapella products that may record keystrokes and keys pressed including: latency times, details of books read, details of words read, detail of errors made, and other data related to learning progress, results of tests, rewards points earned and used, games progress, and other data that may allow us to enhance your learning experience;
- details of settings in Aacapella products at the time data was collected;
- the date at the time data was collected;
- your age at the time data was collected;
- if you use AAC communication software, and details of that software;



- any physical environment data, that may be relevant to the configuration of the services or analysis of data, and may include:
  - if you use a keyguard;
  - if the iPad you use is enclosed in a protective case, and details of the case;
  - if you use one or more switches for input, the type and how many;
  - if you use eye tracking technology;
- links to your school(s), class(es) and teacher(s);
- links to your parent(s) and/or guardian(s);
- any additional information relating to you that you, your parent, carer, school or teacher provide to us directly through our websites or indirectly through use of our websites or online presence, through our representatives or otherwise;
- information you, your parent, carer, school or teacher provide to us through our service centre, our customer support portals, customer surveys or visits by our representatives from time to time.

## What happens if we are unable to collect your data?

If you do not consent to Aacapella collecting, using and retaining the data, or if you are unable to provide the data for whatever reason, you may not use the Services.

Consent is given as part of the registration process and renewed each time you log in to the Services. You may withdraw your consent at any time.

## How do we collect and process your Personal Information?

We may collect your personal information in several ways, including:

- if you are an adult, directly from you;
- if you are a child, from:
  - your parents,
  - your school administrators and teachers;
- if you are a teacher, from your school;
- From data collected in the process of your interaction with the services.

No personal data is entered by children. When children interact with the Services, usage data is collected for analysis, reporting and research.

## How will we use your personal information?

For all registered Users, including children we will use your information to:

- provide access to our services;
- administer and manage accounts, including password resetting;
- communicate with you and provide feedback on the use of the services, including measures of educational status, performance and progress;
- to provide deidentified data for educational research;



- for administrative, planning, product or service development, staff training, quality control and research purposes relating to our products and services.

## How do we restrict the use of your personal data?

Acapella 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 Services;
- the disclosure is to a third party that acts on our behalf, provides certain aspects of our Services or processes data on our behalf, such as a contracted service provider;
- in connection with any transaction involving our companies or assets, where another party acquires ownership or operation of the Services, subject to this Privacy Policy and applicable law; or
- to protect the safety and security of our Registered Users and our Services;

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 Acapella, however, sometimes we may provide aggregated data *without personal information* to government education departments, peak bodies managing or representing schools, or schools themselves for educational/teaching purposes. We 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. 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 authorised educational/school purposes or as otherwise specifically authorised 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.

## How long do we hold your information?

We retain the personal information that we collect from and about our Registered Users for as long as it is needed to provide access to the Services or to manage that Registered User's account.

We take reasonable steps to delete the personal information we collect if your registration to use our Services lapses and you opt out of receiving further communications from us, or if you ask us to delete your information. However, we may retain and use personal information as necessary to comply with our legal and regulatory obligations, to resolve disputes, and to enforce our agreements. We may also retain and use anonymous and aggregated information for performance reporting, benchmarking, analytic purposes, and for product and service improvement.



Registered Users can request that their personal information be deleted by contacting the Aacapella Privacy Officer at: [dataprivacy@aacapella.com](mailto:dataprivacy@aacapella.com).

## How can you view, and update your personal data?

Most of the personal data we hold about you can be viewed and edited, by logging in to our website using your Registered User credentials.

In case you wish to view any other personal data we may hold about you as a Registered User, you may request a copy from [dataprivacy@aacapella.com](mailto:dataprivacy@aacapella.com).

## How do we keep your personal data secure?

Aacapella is committed to information security. We use reasonable endeavours to keep the personal information we collect and use in a secure environment, and we implement appropriate technical, administrative and physical security measures designed to protect personal information from unauthorised access, disclosure, use and modification. These measures include the encryption of personal information and organisational measures such as our incident response plan. We review security procedures and engage independent third parties to review and audit aspects of our information security.

We use Google Cloud Platform for data hosting and storage. Your data may be stored and backed up on Google's secure servers in Australia, Europe, and the USA.

As we have employees in Australia, New Zealand and Europe your personal information may be accessed in countries other than your location by:

- our technical and development team for product development, database management and compliance purposes;
- our administrative team for the maintenance of Registered User accounts;
- our customer support team;
- our education support and professional development team;
- our marketing team for administering mailing lists and informing our marketing activities.

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.

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

## How do we collect data about anonymous users?

When you visit our websites as an anonymous user (i.e. you are not logged in to our Services as a Registered User), we collect data about how you interact with our services for the purposes of analytics which may assist us in maintaining and improving the services.



This information may be collected on our behalf by our service providers, and may include the content you view, the date and time that you view this content, links that you click, the products you view, and your location information associated with your IP address.

When agreeing to our Privacy Policy and Term and Conditions, all Users (including unregistered users and Registered Users) 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 and for the purposes set out in our 'Cookies & Third Party Technologies Policy'.

## Revisions to our Privacy Policy

Acapella 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. By accessing our Services you consent to the terms under which we process your information set out in this Privacy Policy, including any amendment to this Privacy Policy. Revisions of this Privacy Policy will be published on our website.

Where there are important notifications or material changes under our Privacy Policy we will notify impacted customers.

## Contacting Acapella

If you wish to access, update, or delete your personal information, or if you have any questions or concerns regarding your personal information or this Privacy Policy, please contact us at [dataprivity@aacapella.com](mailto:dataprivity@aacapella.com).

We will use our best endeavours to promptly address your security concerns. 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.

## Legislation and Guidelines

For more information on privacy legislation and guidelines in your country we provide the following links:

- Australia: [privacy.gov.au](https://www.oaic.gov.au)
- New Zealand: [privacy.org.nz](https://www.privacy.org.nz)
- United Kingdom: [ico.org.uk](https://ico.org.uk)