

# Privacy Policy

In this Privacy Policy, 'us' 'we' or 'our' means Kioru Australia Pty Ltd [ABN 13 616 131 125] and our related business names. We are committed to respecting your privacy. Our Privacy Policy sets out how we collect, use, store and disclose your personal information.

By providing personal information to us, you consent to our collection, use and disclosure of your personal information in accordance with this Privacy Policy and any other arrangements that apply between us. We may change our Privacy Policy from time to time by publishing changes to it on our website. We encourage you to check our website periodically to ensure that you are aware of our current Privacy Policy.

## What is personal information?

Personal information includes information or an opinion about an individual that is reasonably identifiable. For example, this may include your name, age, gender, postcode and contact details. It may also include financial information, including your credit card information.

## What personal information do we collect?

The type of information that we collect about you is dependent on how you use our website and services offered by us or that we provide to you on behalf of our clients.

We may collect the following types of personal information:

- name;
- mailing or street address;
- email address;
- telephone number and other contact details;
- age or date of birth;
- credit card information;
- your device ID, device type, hardware model, operating system, geo-location information, computer and connection or experience information, local storage, statistics on page views, traffic to and from the sites, ad data, IP address and standard web log information;
- details of the products and services we have provided to you or that you have enquired about, including any additional information necessary to deliver those products and services and respond to your enquiries;
- any additional information relating to you that you provide to us directly through our website or services or indirectly through your use of our website or services or online presence or through other websites or accounts from which you permit us to collect information;
- information you provide to us through customer surveys;
- information collected through cookies; or
- any other personal information that may be required in order to facilitate your dealings with us.

Kioru Australia Pty Ltd does not collect sensitive information about you.

## How do we collect personal information?

We collect these types of personal information in three ways:

- information you provide to us directly, for example when you communicate or make enquiries with us, share information with us from services or websites, interact with our sites, services, content and advertising, or invest in our business or enquire as to potential service agreements;

- information provided to us by our clients under agreements for the provision of services to educational institutions; and
- access information derived from your use of our website and services, including:

In addition, when you apply for a job or position with us we may collect certain information from you (including your name, contact details, working history and relevant records checks) from any recruitment consultant, your previous employers and others who may be able to provide information to us to assist in our decision on whether or not to make you an offer of employment or engage you under a contract. This Privacy Policy does not apply to acts and practices in relation to employee records of our current and former employees, which are exempt from the Privacy Act.

### **Why do we collect, hold, use and disclose personal information?**

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

- to enable you to access and use our website and services;
- to develop, operate, protect, maintain, improve and optimise our website and services, business and our users' experience;
- to send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you;
- to prevent or lessen a serious or imminent threat to the life, health, safety or welfare of any individual;
- to comply with legal obligations, resolve any disputes that we may have with any of our clients or users, and enforce our agreements with third parties;
- to protect against harm to the rights, property or safety of Kioru Australia Pty Ltd, our clients and users; and
- to consider your employment application.

We may also disclose your personal information to a trusted third party who also holds other information about you. This third party may combine that information in order to enable it and us to develop anonymised consumer insights so that we can better understand your preferences and interests, personalise your experience and enhance the services that you receive.

### **To whom do we disclose your personal information?**

Generally, we provide services on behalf of our educational institution clients. In these circumstances, our clients typically collect, hold and use personal information and system data, and manage access to our services by authorised school staff.

We do not disclose your personal information with companies, organisations, government departments and other persons outside of Kioru Australia Pty Ltd except for the purposes described in this privacy policy to:

- our educational institution clients for whom we manage services or third parties authorised by our clients to access the information;
- third party suppliers and service providers (including providers for the operation of our websites and/or our business or in connection with providing our services to you);
- payment systems operators (eg merchants receiving card payments);
- anyone to whom our assets or businesses (or any part of them) are transferred;
- specific third parties that you consent to receiving information held by us; and/or
- other persons, including government agencies, regulatory bodies and law enforcement agencies, medical, paramedic or health professionals, or as required, authorised or permitted by law.

## **Disclosure of personal information outside Australia**

While we make every effort to ensure personal information is kept within Victoria and Australia we do run servers internationally. As such your personal information may be transferred to our servers in our international secure facilities.

We will, however, take reasonable steps to ensure that any overseas recipient will deal with such personal information in a way that is consistent with the Australian Privacy Principles.

## **Using our website and cookies**

We may collect personal information about you when you use and access our website.

While we do not use browsing information to identify you personally, we may record certain information about your use of our website, such as which pages you visit, the time and date of your visit and the internet protocol address assigned to your computer.

We may also use 'cookies' or other similar tracking technologies on our website that help us track your website usage and remember your preferences. Cookies are small files that store information on your computer, TV, mobile phone or other device. They enable the entity that put the cookie on your device to recognise you across different websites, services, devices and/or browsing sessions. You can disable cookies through your internet browser but our websites may not work as intended for you if you do so.

We may also use cookies to enable us to collect data that may include personal information. For example, where a cookie is linked to your account, it will be considered personal information under the Privacy Act. We will handle any personal information collected by cookies in the same way that we handle all other personal information as described in this Privacy Policy.

## **Security**

We may hold your personal information in either electronic or hard copy form.

We take reasonable steps to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification, disclosure or destruction in accordance with this privacy policy.

We use a number of measures to protect your personal information. We use various encryption implementations to protect our website and services. For example, all communications between web services and browser use standard security technology Secure Socket Layers (SSL), administrative user passwords are encrypted with SHA1 and teacher and student passwords are encrypted with OpenBSD bcrypt(). Verification techniques may be used on our website and services for certain modules and functions and various levels of data separation are implemented to prevent inadvertent disclosure of information.

Access to databases is restricted to authorised employees of Kioru Australia Pty Ltd and we run information back ups every day, week and twice a month. Kioru Australia Pty Ltd employees are subject to contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

Access to physical data stores is secured by means of restricted access, password protection and access monitoring.

Unfortunately, no data transmission over the Internet can be totally secure. While we strive to protect such information, we cannot guarantee or provide warranties in respect of the security of your information provided to us or obtained from our website or online services. Accordingly, use of our website and services is at your own risk. Kioru Australia Pty Ltd (and our clients) will not be held responsible for events arising from unauthorised access to your personal information.

## **Links**

Our website may contain links to websites operated by third parties. Those links are provided for convenience and may not remain current or be maintained. Unless expressly stated otherwise, we are

not responsible for the privacy practices of, or any content on, those linked websites, and have no control over or rights in those linked websites. The privacy policies that apply to those other websites may differ substantially from our Privacy Policy, so we encourage individuals to read them before using those websites.

### **Accessing or correcting your personal information**

You can access the personal information we hold about you by contacting us using the details set out below. Sometimes, we may not be able to provide you with access to all of your personal information and, where this is the case, we will tell you why. We may also need to verify your identity when you request your personal information.

If you think that any personal information we hold about you is inaccurate, please contact us and we will take reasonable steps to ensure that it is corrected and updated. You may also contact your educational institution to correct the information.

Additionally, you may be able to review and control some of your personal information from our services. While we allow for online amendment of some information, it may be necessary to contact your educational institution to amend, clarify or request other information from within the system.

### **Destruction of your personal information**

Kioru Australia Pty Ltd will take reasonable steps to destroy or deidentify any personal information about you once the information is no longer required for the purposes for which it was collected or as authorised or required by law.

### **Making a complaint**

If you think we have breached the Privacy Act, or you wish to make a complaint about the way we have handled your personal information, you can contact us using the details set out below. Please include your name, email address and/or telephone number and clearly describe your complaint. We will acknowledge your complaint and respond to you regarding your complaint within a reasonable period of time. If you think that we have failed to resolve the complaint satisfactorily, we will provide you with information about the further steps you can take.

### **Contact Us**

For further information about our Privacy Policy or practices, or to access or correct your personal information, or make a complaint, please contact us using the details set out below:

Kioru International Pty Ltd

Level 1/41 Stewart St, Richmond, Victoria 3121

[hello@saeko.com.au](mailto:hello@saeko.com.au)

Hours: Monday – Friday (8.30am – 5.30pm)

**Effective:** 10 February 2017