

Privacy Policy and Collection Notice – Clarisse Enterprises Pty Ltd

In this Privacy Policy, 'we', 'our', 'us' or 'CEPL' means Clarisse Enterprises Pty Ltd ACN 118 987 901 of Waterman Business Centre Suite 082, 44 Lakeview Drive. SCORESBY VIC 3179. We are committed to respecting your privacy. Our Privacy Policy sets out how we collect, receive, deal with, use, store and disclose your personal information. This includes personal information that we collect or receive via the website located at www.cepl.com.au including all password protected areas and subdomains of such website and all related top-level domains, mobile sites, apps, applications, APIs and widgets ('**Website**') or in connection with our customers' use of our products and services, including the nForma software as a service, nReports, nRoll, nWellbeing, nILP, nAid, nAssessment, Student Contacts, Parent Portal, AutoPrint and Front Cover Designer ('**Software Services**').

By providing to us, including via the Website or Software Services, personal information about you, you expressly consent to our collection, receipt, use and/or disclosure (as applicable) of the personal information in accordance with this Privacy Policy and any other terms, agreements and arrangements that apply between us (including the disclosure of such information to third party hosting service providers, third party software providers and, where applicable, the Catholic Education Commission Victoria ('**CECV**')).

By providing to us, including via the Website or Software Services, personal information relating to another individual:

- you represent and warrant on an ongoing basis that that individual has expressly provided his or her informed, voluntary consent to your collection of such information, the provision of that information to CEPL and the use and disclosure of such information in connection with the Website and or Software Services (including the collection, receipt, use and/or disclosure by CEPL of such information in accordance with this Privacy Policy and any other terms, agreements and arrangements that apply between us, which includes the disclosure of such information to third party hosting service providers, third party software providers and, where applicable, CECV);
- you agree to tell us immediately if that consent is revoked or altered;
- you represent and warrant on an ongoing basis that you have made that individual aware of this Privacy Policy and its contents; and
- you expressly consent to such information being dealt with as described above.

Amongst other things, this Privacy Policy contains information about how you may access personal information about you that is held by us, seek the correction of such information or complain about a breach of the Australian Privacy Principles or Health Privacy Principles, and how we will deal with any such complaint.

References in this Privacy Policy to the consent, rights or obligations of an individual should be interpreted as including references to that individual's parents or guardians where required, or permitted, by law.

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.

This Privacy Policy does not apply to, and we are not responsible for, the use of, or the protection of information provided to, other websites linked to our Website or to third parties whom you have connected with as a result of using our Website.

If you have any questions not addressed in this Privacy Policy, please feel free to contact us using the methods at the end of this Policy under the headings "Making a complaint" and "Contact us".

What is personal information?

- 'Personal information' means information or an opinion about an identified individual, or an individual who is reasonably identifiable (whether the information is true or not or recorded in any form or not). For example, personal information may include your name, age, gender, postcode and contact details. It also includes sensitive information.
- 'Sensitive information' is a subset of personal information that is generally afforded a higher level of privacy protection, such as information relating to a person's racial or ethnic origins, political opinions, religion, sexual preferences or criminal record. It also includes health information.
- 'Health information' includes information or an opinion about the health, illness, disability or injury of an individual, as well as information or an opinion about a health service provided (or to be provided) to an individual.

What personal information do we collect or receive?

We may collect or receive different personal information about you, including health information and other sensitive information depending on the circumstances in which that information is collected or received, including as set out below.

We may also collect or receive non-personal information about you including, but not limited to, data relating to your activities on the Website (including IP addresses) via tracking technologies such as cookies, web beacons and measurement software or data relating to survey responses.

We may collect or receive the following types of personal information:

- name;
- mailing or street address;
- country of residence;
- email address;
- telephone number and other contact details;
- age and date of birth;
- location and time zone details;
- your device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from the sites, ad data, IP address and standard web log information;
- details of the Software Services we have provided to you or that you have enquired about, including any additional information necessary to deliver those Software Services and respond to your enquiries;
- any additional information relating to you that you directly or indirectly provide to us, or via, or through your use of, the Website, or through other websites or accounts from which you permit us to collect or receive information (including the specifications of searches you have conducted on our Website);
- information you provide to us through customer surveys;
- any other personal information that may be required in order to facilitate your dealings with us; and
- information in relation to students and staff and other personnel of our Customers (defined below), including:
 - academic reports;
 - details of involvement in special academic programs;

- details regarding academic performance, including current and historical marks and grades;
- indicators of academic performance;
- details regarding in-class and social behaviour;
- attendance details and history, including the reasons for absences and details about whether absences were supported by written notes from parents or guardians;
- details of first aid incidents and records;
- details of insurance claims in relation to injuries
- health information, including details of any allergies, medical or psychological conditions; disabilities; injuries; medications, medical practitioners, medical history, vaccination history, reports of medical or other health practitioners; etc.;
- details of learning difficulties;
- student welfare information, including details of participation in school support programs and details regarding the involvement of governmental or welfare agencies;
- details regarding family, including family members, family history (including conflicts) and any relevant court orders;
- contact details and details of conversations with students or their parents/guardians;
- photographs of students and staff;
- relevant religious or cultural information;
- details of co-curricular or extra-curricular activities engaged in; and
- next of kin name and contact details.

How we collect personal information

We may collect or receive these types of personal information either directly from you, or from third parties.

In the case of information about students, this personal information is usually received from primary and secondary educational institutions that are customers of CEPL (**'Customers'**), which, as part of their use of the Software Services, enter into, upload onto, or otherwise make available on or via the Website or the Software Services data, content, documents, information, communications, text, images, files or other materials which contain such personal information (**'Customer Data'**).

We may collect or receive this information when you (or third parties):

- submit an order for any Software Services;
- include Customer Data on any part of the Website or the Software Services;
- communicate with us through correspondence, email, telephone, via our Website or in person; or
- otherwise use or interact with our Website, services, content or advertising.

If you do not provide us with required personal information about you, you may be unable to register or remain registered as a user of the Software Services.

If you have provided personal information about you to a Customer, but do not consent to the provision of that information to CEPL and the use and disclosure of such information in connection with the Website and or Software Services (including the collection, receipt, use and/or disclosure by CEPL of such information in accordance with this Privacy Policy), the Customer may be unable to obtain all or part of the benefit of the Software Services as they relate to you, (including by effectively managing academic, educational, social, behavioural, family, health, emotional, medical and other important information about

you, ensuring its staff have access to such information, providing proper care for you, keeping your parents or guardians informed about your progress, wellbeing and any unnotified absences).

Job applicants

When you apply for a job or position with us we may collect or receive 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 generally 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 1988* (Cth) ('**Privacy Act**'). However, CEPL handles staff health records in accordance with the Health Privacy Principles in the *Health Records Act 2001* (Vic) ('**Health Records Act**').

Why do we collect, receive, use and disclose personal information?

We may collect, receive, hold, use and disclose your personal information (including health information and other sensitive information, to the extent it is lawful to do so) for the following purposes:

- to process your registration on the Website and Software Services;
- to respond to any queries you may have from time to time;
- to enable you to access and use the Website and Software Services;
- to operate, protect, improve and optimise the Website and Software Services, our business and our Customers' experience, including by performing analytics and conducting research (e.g. for the purpose of understanding our client demographics, trends, and usage of the Website and services) and for advertising and marketing purposes;
- to send you service, support, operational and administrative messages, reminders, notifications, technical notices, updates, security alerts, and information requested by you;
- to comply with our legal obligations, resolve any disputes, and enforce our agreements with third parties;
- to consider your employment application; and
- to enable our Customers to use the Software Services, including to:
 - provide proper administration of their school and care for their students;
 - keep their staff informed regarding their students' academic and educational performance, social and behavioural issues, family issues, health issues, emotional and medical wellbeing and other important information;
 - keep parents and guardians informed about their child's progress and wellbeing;
 - streamline academic reporting processes;
 - protect the security of their staff, students, visitors and facilities;
 - perform research and statistical analysis; and
 - contact students' parents or guardians via SMS, phone or email if their child is absent without notice.

Do we use your personal information for direct marketing?

We and/or our carefully selected business partners may send you direct marketing communications and information about our products and services. This may take the form of emails, SMS, mail or other forms of communication, in accordance with the *Spam Act 2003* (Cth) and the Privacy Act. You may opt-out of receiving marketing materials from us by contacting us using the details set out below or by using the opt-out facilities provided (e.g. an unsubscribe link).

To whom do we disclose your personal information?

We may disclose personal information (including health information and other sensitive information, to the extent it is lawful to do so) for the purposes described in this Privacy Policy to:

- any person who has access to a Software Services account on which such information is stored, which persons may export or copy such information;
- our employees and related bodies corporate;
- third party suppliers and service providers in relation to our Website and Software Services (including cloud, hosting and data storage service providers and third party software providers);
- where applicable, CECV;
- anyone to whom our assets or businesses (or any part of them) are transferred;
- specific third parties authorised by you to receive information held by us; and/or
- other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

Disclosure of personal information outside Australia

We do not currently disclose personal information outside of Australia.

Retention and storage of collected information

We will retain personal information about the student of a Customer, which we collect or receive in connection with the Customer's use of the Software Services, for so long as the Customer uses the Software Services and for a reasonable period thereafter. However, to the extent personal information is not relevant to, or needed for, the above purposes, we will destroy all records of such personal information.

We will take reasonable steps to destroy or permanently de-identify health information if it is no longer needed for the purposes for which it was collected, or any other purposes authorised by law.

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 or disclosure, and we use a number of physical, administrative, personnel and technical measures to protect your personal information. However, given the sophistication of computer hackers,

we cannot make any absolute guarantee that our systems will never be accessed without our consent or that our systems are impenetrable.

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 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. However, we may be required by applicable laws to ensure you are given such access in relation to certain information (e.g. health information) in certain circumstances.

In order to assist you with a request for access, we may need you to provide details of the Customer who provided your personal information to us. 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 (in accordance with our obligations at law).

If your request is particularly complex, or requires detailed searching of our records, there may be a cost to you in order for us to provide this information, where permitted by law.

Making a complaint

If you think we have breached the Privacy Act (including the Australian Privacy Principles) or the Health Records Act (including the Health Privacy Principles), or you wish to make a complaint about the way we have handled your personal information, you can contact us at the details set out in the next section. 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.

If you are not satisfied with the outcome of your complaint or the way we handle it, you may make a complaint to the Office of the Australian Information Commissioner at <https://www.oaic.gov.au/individuals/how-do-i-make-a-privacy-complaint> or the Victorian Health Complaints Commissioner at <https://hcc.vic.gov.au/>.

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:

Clarisse Enterprises Pty Ltd ACN 118 987 901
Waterman Business Centre Suite 082, 44 Lakeview Drive. SCORESBY VIC 3179
info@cepl.com.au

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