# **Home Learning Academy**

# **Privacy Policy**

The privacy of our users is extremely important to us. We believe you should understand what data we collect and why, where and for how long it is stored, and who we share it with. It is your data and it should be under your control. With your consent, we use your data to support your learning.

If you require any more information, have any questions about our Privacy Policy, or believe we are not upholding this philosophy, please contact us by email at <a href="mailto:admin@bington.net">admin@bington.net</a>

This Privacy Policy describes in detail the types of User Data that are collected and stored by Home Learning Academy (HLA).

This Privacy Policy is effective as of 1<sup>st</sup> October 2021 and should be read in conjunction with our Terms of Use and its definitions.

## 1. Personal Information

HLA collects and stores Personal Information relevant to the creation and management of Registered User accounts. Registered Users are described in our <u>Terms of Use</u>

## 1.1. What Personal Information we collect and why

### Full name

We collect your first name, last name and username so we can:

- address you in communications;
- help Educators (and sometimes other students) at your institution identify you; and
- award certificates of achievement in your name.

You can update your name in your account settings under your profile settings.

#### **Email addresses**

We collect your email address(es) so:

- you can login to your account with a unique identifier;
- we can notify you of important information (e.g., password reset, account changes, or policy updates);
- we can support your learning (e.g., encourage you to continue a course or notify you when you earn a certificate), and
- you can receive newsletters (e.g. about new courses and other educational activities), until you opt out.

We will, under no circumstances, send you any marketing or sales information.

## 1.2. Where we collect your Personal Information

Your Personal Information can be provided by you, or may be provided by someone on your behalf, such as a parent or guardian, or Educator at your Institutions.

### When you register yourself or are registered by a parent or guardian

We collect your full name, username and email address These data are essential for creating an account. You may enter other information on your profile page but it is not essential.

### When you are registered by an Educator at an Institution

We collect your full name, username and email address, as provided by your Educator(s). We also collect the name of the school/institution that you attend in order to create separate groups.

Your Educator(s) may consent to our Privacy Policy and Terms of Use on your behalf.

## 1.3. How long we keep your Personal Information

We store your Personal Information as detailed above until:

- 1. You request Admin to delete your account at which point your account is deactivated and all Personal Information is erased. You can submit a request to admin@bington.net Deleted accounts cannot be recovered; or
- 2. **Your account expires** at which point we erase all Personal Information. Unless you reactivate your account, your expired account is not identifiable in any way. We expire all accounts that have been inactive for more than 12 months.

### 1.4. Who we share your Personal Information with?

We will share your Personal Information in our Platform with Verified Teachers at your linked Institutions, or with tutors/teachers engaged by HLA, or by your Institution(s).

### 1.5. What you can do about it

You can delete your account in your account settings under Profile or edit your account settings at any time to add, update, or remove Personal Information from your account,

In accordance with your <u>right to be forgotten</u>, account deletion erases all of your Personal Information and it cannot be reversed.

# 2. Learning Data

We retain Learning Data from your interactions with our Platform. This includes:

• Results of quizzes

- Uploaded submissions
- Feedback on submissions
- Any submissions made on Course Chatrooms and Wiki activities

All of these data are collected to support and encourage you in your learning, give your Verified Teachers more information about your progress, and for HLA to improve our learning technology and content in the Platform.

None of this information is passed onto any third party organisation or institution.

## 3. Web Traffic Data

Like many other platforms and websites, HLA collects and stores web traffic data. Our web traffic log files record visits to HLA websites and the actions performed by visitors – a standard procedure for maintaining security and the reliability of our service.

### 3.1. What Web Traffic Data we collect and why

The Web Traffic Data we collect from your web browser is:

- the date and time you accessed the website
- the URL you accessed on our website
- the browser and operating system you used to access our website

This information is used to analyse trends, administer the site, and track user's movement around the site.

#### 3.2. Where we collect Web Traffic Data

We collect Web Traffic Data in log files on every page visit to HLA websites.

## 5. Cookies

"Cookies" are small pieces of information that can be placed on your device by a website in order to identify your web browser to that site.

The HLA Platform uses cookies to relate your user account to your browser and browsing session.

Cookies are critical to enabling the functionality on our Platform. The functionality on the HLA Platform will be unavailable if your browser is configured to reject cookies.

### 5.1. What Cookies we use and why

The specific cookies stored on your device are described in detail in our Cookies Policy.

At a high level, we use cookies to:

- **associate your account with your browser**: If you are using an anonymous user account, the information in these cookies is the only way to access your existing course progress. If you are a Registered User, these cookies store information you need to stay logged in.
- **simplify single sign on (SSO) access** to the Platform by redirecting logged out Registered Users to the authentication service they used previously.
- **increase the security of our Platform** by protecting against <u>cross-site request</u> forgeries.
- track website visitors and their activity using Microsoft Dynamics 365.

### 5.2. Who we share our Cookies with?

We don't share HLA cookies with anyone.

### 5.3. What you can do about it

If you wish to disable cookies, you may do so through your individual browser options. More detailed information about cookie management with specific web browsers can be found at the browsers' respective websites.

# 6. Sharing Information

Under limited circumstances, HLA will share your data with other entities, specifically:

- your Verified Teachers;
- your Institutions and their systems (including online providers);
- Tutors, provided by HLA or your Institution (who assist students in the platform);

We share this data where the risk of sharing your data is small, and is substantially outweighed by the benefits to you and your Verified Teachers, and creates a better learning experience for you and/or for future students.

Each scenario has been carefully considered, and where possible we anonymise and aggregate data before providing it to third parties. Some of these scenarios may not apply to you, depending on how you or your Institution(s) use HLA.

Most of these scenarios and the corresponding shared data has been discussed earlier, but has been split across the types of data.

### 7.1. Your Verified Teachers

Verified Teachers, in addition to the managers and creators of different courses, are teachers at your institutions who have enrolled you into one of the courses.

**If you are a student** who belongs to one or more Institutions, we will share your Personal Information and Learning Data with all Verified Teachers at your Institution(s).

Note: any Verified Teacher at your Institution can access your Personal Information and Learning Data.

A Verified Teacher at your Institution(s) can see and update your Personal Information, including (but not limited to) your full name, username and email addresses.

Verified Teachers at your Institution(s) may also have access to your Learning Data, including (but not limited to) your learning activity, summaries of progress and activity, Tutor Support data, and Feedback data, all via their Teacher Dashboard.

This is essential to allow Verified Teachers to manage their classes, record marks and monitor your learning progress.

**If you are a Verified Teacher** in an Institution then we will share your Personal Information with other Verified Teachers at your Institution. This allows Educators to manage the privacy of students, by controlling who can view student information on HLA.

### 7.2. Your Institutions and their systems (including online providers)

We will share Personal Information and Learning Data with your Institution(s) and representatives of your Institution(s). In most instances, this will be Verified Teachers, but it may include authorised administrative and technical staff from your Institution(s). This may be required to confirm who is appropriately enrolled in an HLA course.

#### 7.3 Tutors

Some of our courses may have expert tutor support. **Should you request,** we may share your Personal Information and course specific Learning Data with our trained expert tutors for the duration of the tutoring support period.

Tutor support may be provided by:

- HLA staff or volunteers;
- your Institution(s).

We will never share your Personal Information with a research organisation.

# 9. Tutoring Support

All HLA staff providing support have working with children certification in their relevant states or jurisdictions.

# 10. Email support

If you contact us about a topic related to an external organisation, we may forward your query to the relevant organisation.

# 11. Website Security

We use the industry standard encryption software, Transport Layer Security (TLS), for all communication between you and our website. The URL in your browser will show https (rather than http) to show this security feature is in use.

# 12. Protecting your children online

We believe it is important to provide added protection for children online. We encourage parents and guardians to spend time online with their children to observe, participate in and/or monitor and guide their online activity. If, as a parent or guardian, you are concerned about any information we hold about your child, please contact us immediately (using the contact in the first paragraph) and we will use our best efforts to promptly remove such information from our records.

## 13. Consent

By using the HLA Platform, you consent to our <u>Terms of Use</u>. By registering an account or permitting someone to register on your behalf, you hereby consent to HLA collecting and using your data according to our Privacy Policy.

# 14. Major and minor policy updates

We may update our Privacy Policy or <u>Terms of Use</u> in a minor way, without notice to you or requiring your consent. Where we make major updates to our policy, we will notify you and ask you to consent.

We classify updates as "minor" where your privacy is not materially reduced, or where your and our obligations are not affected. For example, minor changes may include (but are not limited to):

- clarifying any ambiguities in the Privacy Policy text or correcting typographic errors;
- increasing your privacy by removing a data sharing arrangement (with a third party or service);
- adding additional privacy obligations on HLA; or
- stating HLA's obligations under privacy regulations in different jurisdictions.

All updates (minor or major) will be noted as such in the Update Log.