

Privacy Policy

Hello there! We are EnrolNow Pty Ltd ABN 711 497 11580 (**EnrolNow**, **we**, or **us**) and we're powering Australia's early learning industry through advanced waitlist and enrolment software.

This document is our **Privacy Policy**.

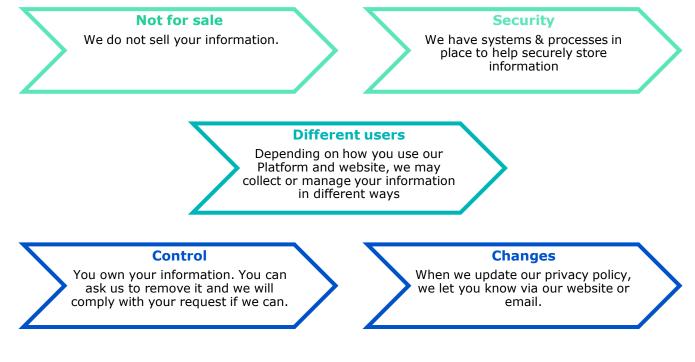
We're Aussies (and proud of it!) and so we work to meet the <u>Australian Privacy Principles</u> and the requirements of the <u>Privacy Act</u>.

Click on an icon or heading below to go to that section of our Policy



Privacy Summary

We're all about efficiency and visibility, so here is a summary of the key ways we manage and use your personal information.



1. Who does this Privacy Policy apply to?

Our Privacy Policy applies to various people and organisations that we interact with, the main ones are listed below:



This policy applies to EnrolNow and all persons who access our services, including all Clients, Families, and Visitors.

To be efficient, we'll talk about you all collectively as 'you' or 'Users'

- > We help our Clients manage a lot of important information and so we think it is crucial to show you how we manage your personal information.
- > If something applies specifically to a type of user, we've tried to make that clear.

2. Accepting this Privacy Policy

How you might accept our Privacy Policy:

- > Clients accept our Privacy Policy when they buy our products and services,
- Families accept our Privacy Policy by accessing our Platforms (including our website enrolnow.com.au, our online enrolment platforms and forms, EnrolNow One or other platforms we provide, or
- > **Visitors** accept our Privacy Policy when they visit our website or send us information (such as an email or enquiry form message).

Once accepted, the terms in this Privacy Policy apply to your personal information that we hold or collect in future.

For questions or notices, please contact us: <u>support@enrolnow.com.au</u> | Policy updated: March 2023

Collecting and using information

3. What kind of personal information do we collect?

When we collect personal information, we do so in line with this Privacy Policy.

Personal information is information that can identify you. Examples include your name, email address, birthday, device information and IP address or images of you.

> You don't have to give us your personal information, but if you don't, we might not be able to provide you our various services or you might not be able to access certain Platform features.

Examples We can't contact Clients if we don't have your contact details. We can't confirm a child's enrolment if we don't have confirmation of immunisation status.

Depending on how we interact with you, we might collect some or all the following information:

		Formilies	
Contact	Clients ✓ Name, Email address, Business address, Phone number	Families ✓ Name, Age, Email address, Date of birth, Address, Phone number 	Visitors ✓ Name, Email address, Phone number
Sensitive	× We do not collect sensitive information from Clients	 Required enrolment records including: Medical history, medications, allergies, immunisation status, cultural, ethnic, and religious information, Working with Children details, Visa or other concession details, court orders. See details of enrolment record requirements here. 	× We do not collect sensitive information from Visitors
Social	✓ Gender, Associated accounts like Google and information you give us through them, Images of you, Languages spoken	✓ Gender, Images of you, languages spoken.	✓ Gender, Associated accounts like Google and information you give us through them, Images of you
Device	 Device type, IP address, browser type, operating system, Location, Network information 	 Device type, IP address, browser type, operating system, Location, Network information 	✓ Device type, IP address, browser type, operating system, Location, Network information
Actions	 How you interact with our Platform and website, Browser session data, Search history, Enquiries you make about our services 	✓ When and who picks up a child, How you interact with our Platform and website, Browser session data, Search history	✓ How you interact with our website, Browser session data, Search history, Enquiries you make about our services
Financial	 Purchase history, Payment method (through our third- party payment processor), bank account details 	 Purchase history, Payment method (through our third-party payment processor), bank account details, eligibility for financial or government assistance 	× We do not collect financial information from Visitors
Content	 Contents of communications, Stored documents and media, SMS and text messages, care requirements 	✓ Contents of communications, Stored documents and media, SMS and text messages, care requirements	✓ Contents of communications
Location	 Delivery address, Geo-tag location, Publicly available check in location data 	 Home address, Publicly available check in location data 	✓ Geo-tag location, Publicly available check in location data

4. Sensitive Information

How do we manage sensitive information?

Sensitive info receives a higher level of protection under the Australian Privacy Principles.

Sensitive information means information relating to **health information** or biometric information, racial or ethnic origin, political opinions, religion, trade union or other professional associations or memberships, philosophical beliefs, sexual orientation or practices, or criminal records.

We only collect sensitive information to provide our services

- As we help our clients and Platform users manage, track and maintain enrolment records, we may collect sensitive information from users.
- > We only collect and use sensitive information for the <u>primary purpose</u> of allowing our clients to meet their regulatory requirements when using our Services.
- > Regulatory requirements for enrolment records

For more details on the enrolment record requirements, please visit: <u>https://www.education.vic.gov.au/childhood/providers/regulation/Pages/enrolment_records.aspx</u>

5. Why do we collect and use your information?

A note for Families: We collect and manage your information on behalf of our Clients.

Other policies will apply to Families in relation to how others such as our Clients or government agencies may manage the information Families submit via our Platforms

Depending on how we interact with you, we might collect, hold, use, and disclose your information for varied reasons, including:

- > To deliver our Platform and related services to Clients (so that they can enrol Families),
- > To give important service and platform updates to Clients,
- To communicate with Clients or Visitors generally or to respond to specific questions (including to market products and services to our Clients and to Visitors who sign up to our mailing list)
- > To verify identity or address and delivery information,
- > To provide Platform and website functionality,
- > For internal record keeping, invoicing, billing, and to take payment and to give refunds,
- For analytics and market research, including to operate and improve our Platform and website,
- > To comply with our legal obligations or to resolve disputes,
- > To consider your application to join our team.

Getting and giving information from third parties

> If we get personal information about you from a third party, we manage and protect it as set out in this policy.

For example, if our Client gives us a list of information for us to upload into an enrolment database and your information is in that list from our Client.

> If you are a third party giving personal information to us about somebody else, you warrant to us you have that person's consent to give us their personal information.

For example, if you are our Client and you give us a list of information for us to upload into an enrolment database, then you must have consent to share that information with us.

For example, in relation to Families, if a parent enters information about their child, then the parent gives consent on behalf of their child.

For example, in relation to Families, if a parent enters information about individuals who are authorised to collect the child from a service, then the parent gives consent on behalf of that individual.

6. Your rights and your personal information

A note for Families: In the first instance, you will need to contact the relevant early learning organisation (our Clients) for access to your data. There may be legal requirements that mean your data cannot be amended.

We want all users to feel in control of their own personal information.

- Clients and Visitors can ask us for access to their data and ask what Personal Information we hold about them
- You can ask that we correct your data if you think it's not right.

Deleting your information

A note for Families: In the first instance, you will need to contact the relevant early learning organisation (our Clients) to request your data is deleted. There may be legal requirements that mean your data cannot be deleted.

- You can ask that we delete the personal information we hold about you at any time.
- > To the extent we're permitted by law:
 - > We will take reasonable steps to delete your personal information from our current records.
 - > If you ask us to delete your personal information, we will let you know how that deletion affects your use of our Platform and services.
 - > If there are exceptions which mean we are not able to delete your data as requested, we will set out the details for you in response to your request.
- > If your agreement with us ends, we delete the personal information we hold within the timeframe set out in our agreement with you.

If you ask us to delete your information, we will need to verify that you are who you say you are, so we ask for proof of identity (and guardianship for children) for your request.

Opting out: Changing your preferences

All users can opt out of marketing communications at any time by clicking on the link in our communications to unsubscribe.

Managing children's information

Many of the Services we provide to our Clients involve managing information from Families which includes children's information.

In Australia, children have the same privacy rights as adults.

- > Parents and guardians in Families are responsible for their child's information. Please contact us if you have any concerns or questions about your child's information.
- > Our services are not directed at children. It is our Clients' responsibility to ensure all Families have consent to provide information that we receive.
- > Whilst it is our Client's responsibility to ensure only authorised parents and guardians make use of our forms and platform, if we do discover information was collected or provided to us from children and without verified consent of a parent or guardian, then we will take actions to delete that information.

Sharing information

7. Sharing

Who do we share personal information with?

Depending on how we interact with you, we might share your information with different organisations, including:

- > Our Clients (we share Families' information with a relevant Client organisation),
- > Our employees, and related entities,
- Our third party service providers and suppliers such as IT, data storage and data collection and processing (such as Google Analytics or other relevant businesses), web-hosting and server, delivery, design, marketing, and maintenance providers as well as advisors and payment systems operators,

This may include parties located, or that store data, outside of Australia

- > Existing or potential agents or business partners, sponsors, or promoters of our competitions,
- > Anyone we transfer our business or assets to,
- > Credit reporting agencies, courts, or authorities if you do not pay for our goods or services,
- Authorised law enforcement agencies who follow the legally required processes, or in connection with any actual or prospective legal proceedings, or to establish, exercise or defend our legal rights.

Core third party integrations

Third parties we currently use include:

- > <u>Zoho</u> (AU Hosted)
-) <u>Jotform</u> (AU Hosted)
- > <u>Burst SMS</u> (AU Hosted)
- > <u>AWS</u> (AU Hosted)

8. Sharing information outside Australia

Some suppliers we use to deliver our Platform and services are located outside Australia.

- > We may disclose your personal information outside Australia.
- Overseas third parties might not be governed by the <u>Privacy Act</u> and might not comply with the <u>Australian Privacy Principles</u>. So if those parties breach the Privacy Principles, you aren't protected by the Privacy Act.
- > By giving us your personal info, you consent to us disclosing it outside Australia and acknowledge we aren't required to ensure overseas recipients manage your personal information in line with Australian Privacy Law.

Our operations

> Enrol Now's offices, employees and hosting facilities are all located in Australia.

Our supplier operations

Supplier>	EnrolNow	Zoho	Jotform	Burst SMS	AWS	Software partners
Account Management	Australia	Australia	Australia	Australia	Australia, USA	Australia
Support Staff	Australia	Global	Global	Australia	Global	Australia
Data Stored	Australia	Australia	Australia	Australia	Australia	Not applicable
Cloud Access	Global	Global	Global	Global	Global	Not applicable

9. About our Platform and integrations

EnrolNow One is a **flexible CRM** style database, enabling one central source of truth for your organisation.

About our core Platform software

- > EnrolNow One Platform uses **Zoho CRM** platform.
- > EnrolNow One Forms uses **Jotform Enterprise**.
- > All data is hosted in Australia.

Custom configuration

> We build and deploy additional system configuration and scripting within the Zoho environment to ensure the specific and unique requirements of each client are delivered.

Platform details overview

Product / Module	Included (core)	Additional Module (optional)	3rd Party Software	EnrolNow Software	Data Information
EnrolNow One Platform	~		~		See Zoho
EnrolNow One Forms	~		~		See Jotform (Enterprise Account)
SMS		~	\checkmark		See Burst SMS (ISO certificate and pen test available)
Digital Sign In Sign Out		~		~	Hosted on AWS (S3 Bucket)
Transact (payment gateway integration)		~		~	Hosted on AWS (S3 bucket) with Payment API (via Payrix)
Allocation Engine	~			~	Hosted on AWS (S3 Bucket)

Storing information

10. Store

How do we store and secure this information?

- > We store all Personal Information in electronic form on a secure server hosted in Australia. These secure servers are owned and operated by third parties (see **above**).
- > Whilst we take measures to safeguard against unauthorised disclosures, we can't assure you the personal information we collect won't be disclosed in a way that is inconsistent with this Privacy Policy.
- > We cannot guarantee the security of any information transmitted to or by us over the Internet.

Other **details**

11. 💮 Cookies

We may use cookies on our Platform from time to time.

Cookies are small text files placed in your computer's browser to store your preferences.

- On their own, cookies do not tell us personal information however, they let others like <u>Google</u> and <u>Facebook</u>, push our adverts to appear on your social media and online media as part of our marketing.
- > If you give us personal info, we may link this to the data stored in the cookie.

12. 🛎 Web beacons

We may use web beacons on our Platform from time to time.

- > Web beacons are small pieces of code placed in a web page or email to monitor behaviour of site visitors and email recipients.
- We may also use Google Analytics to collect and process data. For more details on how Google uses data when you use third party websites or apps, please search <u>Google's site</u>.

13. Links to other websites

Our Platform and website may link to other websites and applications that we don't control.

- > We cannot and do not protect personal information you share with those other websites.
- > Check those other websites for details of their privacy policies.

14. Changes

We will change this Policy if we change the way we manage your personal information changes or privacy laws change.

> When we do, we put the updated policy on our Platforms and, if possible, we may also notify you via email.

15. Complaints and questions

- Let us know if you have questions or concerns about how we use your personal information or the way we try to explain how we manage your information. We know we won't always get things perfect, so we appreciate your feedback to improve.
- First, please contact us so we can help resolve your issue or question, <u>support@enrolnow.com.au</u>.
- **Second,** we'll work through your question or feedback, and get back to you with an update within 14 days.
- **Third,** if you aren't happy with our response, you can escalate your complaint to the Privacy Commissioner via their website: <u>oaic.gov.au</u> or contact OAIC via <u>enquiries@oaic.gov.au</u>.