

Last updated: October 2024

## About this policy

Kudos Kids & Co Pty Ltd (ACN 671 717 285) (**Kudos**) provides a school communication platform that connects schools, educators, students, parents and family members Australia-wide (**Kudos App**).

All references to 'us', 'we' and 'our' in this Privacy Policy are references to Kudos. All references to 'you' and 'your' in this Privacy Policy are references to:

- the students that use the Kudos App (**students**);
- the educators that use the Kudos App (**educators**);
- the parents or guardians of the students (**parents**);
- the approved family members or family friends who have been given access to the Kudos App (**family members**); and
- the schools that have adopted the use of the Kudos App and their administration staff (**schools**).

At Kudos, we understand the importance of your privacy and the security of your data. It's also important to us. We take privacy seriously and understand the importance of transparency, which is why we publish this Privacy Policy so that you can understand the types of personal information we collect about you, what we do with it, and who we disclose it to.

We're committed to collecting, using and disclosing personal information in accordance with the requirements of the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles contained within it, along with other applicable privacy legislation. When we use the term 'personal information', it has the meaning given to it in the Privacy Act.

From time to time we will review this Privacy Policy to make sure it reflects any changes in our services. If you have any questions or feedback about this Privacy Policy, please contact us using our contact details on this website.

## About the Kudos App

To understand how we handle personal information, we first need to explain a bit more about the Kudos App and what it does. Essentially, the Kudos App is an online platform which facilitates the sharing of photos and videos between students and their parents and family members. The parents and family members can then interact and engage with what the students post. Educators have to approve posts before they go online. Educators can also post on behalf of students, but the post is only visible to the educator, the student, and the student's family members.

There is a portal that schools use to set-up and manage the accounts for their students and educators (**Schools Portal**), and the parent nominated by the school will be able to add family members to that student's feed within the Kudos App. The parents and family members can only see what is uploaded by the student they are linked to, and not other students.

## Types of personal information we collect and who we collect it from

In order to provide the Kudos App, we need to collect personal information. We need to do this for a number of reasons that relate to the administration of the Kudos App. We've put a lot of effort in to collecting as little information as possible in order to provide the services required to run the Kudos App.

Given there are photos and videos taken of students and educators, it's also possible that we'll unavoidably collect information about race, religion, disability status, or any other types of information that you may be able to determine just by looking at somebody. That is unavoidable if we're collecting photos and videos of what people look like, and we minimise this as much as we can.

When you visit the Kudos website or use the Kudos App, we might also receive technical data such as the IP address you use, device information, and other general information about the way in which you use the Kudos App.

We provide more detail below as to the types of information we collect on each type of user.

#### If you are a student

If you are a student, we will collect your personal information from your school when they sign you up to the Kudos App and your account is created. However, your parents will need to give their permission for you to use the Kudos App before you'll be able to login.

When setting up your account, we will generally collect your full name, your student ID, your year level, and your classroom code.

Once your parents have provided permission for you to use the Kudos App, we'll also collect the photos and videos that you upload to the Kudos App, and sometimes you might be in the photos and videos that other students upload. We will also collect the comments that are posted in the Kudos App.

#### If you are an educator

If you are an educator, we will collect your personal information from your school when they sign you up to the Kudos App and your account is created. However, you will need to accept the terms and conditions in the Kudos App before you'll be able to login.

When setting up your account, we will generally collect your full name, your classroom code and your email address. We'll also collect the photos and videos that you may be in, though as the educator you have the moderation capability and will be able to delete (or refuse to approve) any photos or videos that you happen to be in, if you do not wish that to be the case.

We will also collect the comments that are posted in the Kudos App.

#### If you are a parent

If you are a parent, we will collect your personal information from the school when they sign you up to the Kudos App and your account is created. However, you will need to accept the terms and conditions in the Kudos App before you'll be able to login.

When setting up your account, we will generally collect your email address which may contain your name in it.

Once you've accepted the terms and conditions and your account becomes active, we will collect your name if you give it, however you can use a pseudonym or no name at all.

We will also collect the comments that are posted in the Kudos App.

#### If you are a family member

If you are a family member, we will collect your information from the parent when they provide your details as one of the approved people who can view the student's posts in the Kudos App.

We will collect your email address, which may contain your name in it. Once you've accepted the terms and conditions and your account becomes active, we will collect your name if you give it, however you can use a pseudonym or no name at all.

We will also collect the comments that are posted in the Kudos App.

#### If you are a school

If you work at a school, we will collect your personal information when the school signs up to the Kudos platform.

We will collect the name, telephone number and email address of the school administrator.

### **How we use your personal information**

The primary purpose for which we collect your personal information is to enable the functionality of the Kudos App as described earlier in this document. We will also at times use your personal information to provide you with customer support and for other purposes directly related to the reason we collect your personal information.

We will only use your personal information for a secondary purpose if you've provided us consent to do so, or if you'd reasonably expect us to use the personal information for that reason (for example, you've contacted us asking us to look at an issue for you, or we need to verify your details if you've forgotten your login).

We may also use de-identified and aggregate technical data that we receive about the way in which you use the Kudos App or the Kudos website to improve our services. This would not ordinarily include personal information.

### **Who we disclose your personal information to**

We have no interest in making money from trading personal information. We will never sell your personal information, including for the purpose of training large artificial intelligence data sets.

We understand that the Kudos App involves children, and the sensitivities around protecting the personal information, including photos and videos, of children.

We maintain all personal information in strict confidence. We only disclose it to third parties if that will enable us to provide you the service. For example, we use a third-party email service to send emails to you. For schools, to facilitate payments, we use a third-party payment provider. We use a third-party IT provider to enable us to develop and maintain the Kudos App.

We've made sure that all of our third-party providers have the strictest of privacy protections and only have access to the bare minimum data that they need to.

We may also disclose your personal information if we're authorised or required to do so by law, and this might include where you've given us your express consent to use your personal information in a specific way or that particular circumstances exist which would authorise or require the disclosure. It is unlikely, but we may also disclose your personal information to our external professional advisors such as our lawyers, and they would be required to maintain your privacy because of their own professional obligations.

## **Overseas recipients**

We have ensured that your personal information is all hosted and stored on Australian servers.

In very rare cases, in the circumstances set out above, some limited personal information may be available to some overseas recipients.

At the moment this may include where one of our staff is temporarily working from an overseas location, or where our IT provider may need to use development or support services located overseas. However, our third-party providers are required to comply with confidentiality restrictions and the data that they have access to is encrypted and limited in order to protect your privacy.

## **Who can view the content in the Kudos App?**

The content in the Kudos App, which includes photos, videos, and text comments and captions, can only be viewed by the authorised users of the Kudos App. These include students, educators, and approved family members. We at Kudos can't view the content, and we've designed it that way for your protection.

Students cannot view the feeds of other students, and the family members linked to one student cannot view the feeds of other students.

## **How we keep your personal information secure**

We take all reasonable precautions to protect your personal information from unauthorised disclosure or access, including misuse or loss.

This includes using industry-standard encryption methods when storing and transferring personal information, and the use of audit logging and access controls that regulate who can access each type of personal information. We've ensured our data is hosted within Australia.

We have built in protections so that administrators cannot see the photos and videos that are posted in the Kudos App.

We regularly review the changes to the Kudos App to make sure that we continue to meet our privacy and security commitments.

## **How to access, correct or update your personal information**

If you would like to know what personal information we hold about you, please feel free to contact us using the details below. We'll be happy to correct or update your personal information.

If you no longer want us to hold your personal information, you can write to us and request that we delete it. If there is no legal reason that we're required to hold on to the information, we will delete the information within a reasonable time.

## **How to contact us or make a complaint**

If you would like to contact us for any reason, including to make a complaint, please contact us at [admin@kudoskidsandco.com](mailto:admin@kudoskidsandco.com).