



PRIVACY STATEMENT

InLoop is committed to protecting your data and providing you with a safe online experience. This Privacy Statement explains how we may collect, use and disclose your Personal Information when you visit our Sites or use our Services. By providing Personal Information to us and/or using the services provided by us, you consent to our data practices, including the collection, use and disclosure of your Personal Information in accordance with this Privacy Statement and any other arrangements that apply between us.

Where there are capitalised terms used in this statement that are not otherwise defined, you can find the definitions in the definitions section below.

1. GENERAL

- 1.1 This Privacy Statement applies when you visit our Sites or use our Services and governs data collection, use and disclosure.
- 1.2 This Privacy Statement, and any terms and definitions in it, should be read in conjunction with the Terms and Conditions of Use found on or through our relevant mobile or device application, or found at www.flexischools.com.au and/or www.flexibuzz.com.au as appropriate, and are available in hardcopy on request. If any part of this Privacy Statement is inconsistent with any term set out in the relevant the Terms and Conditions of Use, the terms of this Privacy Statement will prevail to the extent of the inconsistency.
- 1.3 Please **contact us** (through the method set out in clause 9 below and/or on our website) if you have questions about these terms or our privacy practices that are not addressed in this Privacy Statement.

2. COLLECTION OF YOUR PERSONAL INFORMATION

- 2.1 InLoop collects Personal Information, including the following types of information:
 - e-mail address;
 - name;
 - age;
 - home or work address;
 - organisation name and address;
 - telephone number;
 - password; and/or
 - information through customer surveys or any additional information relating to you that you provide us directly through our Sites, or indirectly through your use of our Sites.
- 2.2 The information that we seek to collect about you may vary and may depend on services that we provide. If you do not allow us to collect all of the information we request, we may not be able to deliver all of those services effectively or at all.
- 2.3 There is also information about your computer hardware (including hand-held devices) and software that is collected by or on behalf of InLoop. This information can include your IP address, browser type, device location, domain names, access times and referring web site addresses. This information is used by us for the operation of the service, to maintain quality of the service, and/or to understand general statistics regarding use of the Services.

- 2.4 InLoop's collection of data as set out in this clause and Privacy Statement generally may occur directly by us, through electronic means (for example when you visit our Sites), or through third party service providers acting on our behalf.
- 2.5 Your information, including Personal Information, may be collected when you:
- register on our website;
 - download our app;
 - communicate with us through correspondence, chats, email or when you share information with us from other social applications, services or websites; or
 - interact with our Sites, services, content and/or advertising.
- 2.6 Where links to other websites are provided through the Services, we encourage you to review the privacy statements of any such web sites you choose to link to so that you can understand how those web sites collect, use and share your information. InLoop is not responsible for the use, access, storage or treatment of your data (including Personal Information) and the privacy statements or other content on web sites or applications outside of our websites or our applications.

3. USE OF YOUR PERSONAL INFORMATION

- 3.1 InLoop collects and uses your Personal Information to operate and deliver our Services. Where the Services you have requested are delivered by another party engaged by us either from Australia or other international locations, we may provide your details to the other party to allow them to perform the Services required, provided that we take reasonable steps to ensure such other party is subject to appropriate confidentiality and security measures.
- 3.2 InLoop may use your Personal Information to send you direct marketing communications and/or inform you of other products or services available from InLoop, its affiliates or other approved third parties. InLoop may also contact you via surveys to conduct research about your opinion of current Services or of potential new services that may be offered. These communications from us may take the form of emails, SMS, mail or other forms of communication, in accordance with all applicable laws. You may opt-out of receiving marketing materials from us by contacting us using the details set out on our website or by using the opt-out facilities provided (eg an unsubscribe link).
- 3.3 Credit card details entered into the applicable Site by you are transmitted using industry-standard encryption to InLoop's e-commerce payment gateway provider (PayPal Australia Pty Limited), where they are held by that provider or its financial institution for the purpose of processing payments arising from your use of the applicable Site. Your credit card details are not recorded or stored by InLoop and InLoop will not provide your credit card details to any other third party without ensuring such third party is subject to appropriate confidentiality terms and conditions. Further details on how PayPal treats your credit card-related information may be found by visiting the Paypal Privacy Policy available at: <https://www.paypal.com/au/webapps/mpp/ua/privacy>.

4. DISCLOSURE OF YOUR DATA

- 4.1 InLoop may disclose Personal Information or other information about or provided by you for the following reasons:
- without notice and if authorised, permitted or required by law or a regulator, including in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on InLoop or the relevant site; (b) protect and defend the rights or property of InLoop; and/or (c) act under exigent circumstances to protect the personal safety of users of InLoop, or the public;

- to members of the InLoop family of entities, to, among other things, provide the Services and related services to you, to manage risk, to help detect and prevent illegal acts, and to help InLoop manage services and communications to you;
- to third party suppliers and service providers (including providers who perform services and functions at InLoop's direction and/or on InLoop's behalf in connection with providing any products and services to you);
- to third parties for our internal business purposes or as permitted or required by law, including to support our audit, compliance and corporate governance functions;
- to third parties who may collect certain use statistics from your devices or from our Sites in accordance with clause 2.2 above;
- to anyone to whom our assets or businesses (or any part of them) are transferred;
- to third parties where you have expressly consented to the disclosure or your consent may be reasonably inferred from the circumstances; and
- where we are otherwise permitted to disclose the information under the Privacy Act.

4.2 InLoop may collect, use and disclose information associated with your use of the Service provided that the information is de-identified, aggregated or otherwise made anonymous and use and disclose that de-identified, aggregated or otherwise anonymous information for any purpose with third parties provided that, in so doing, InLoop does not reveal any Personal Information.

5. USE OF COOKIES

5.1 InLoop uses "cookies" as part of the normal operation of our Sites and the Sites may not work appropriately if your browser has cookies disabled. A cookie is a text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you. Where a cookie collects any Personal Information, for example where the cookie is linked to your account, we will handle this in the same way that we handle all other Personal Information as described in this Privacy Statement.

5.2 You have the ability to accept or decline cookies. If you choose to decline use of cookies, you may not be able use the Services.

6. SECURITY OF YOUR PERSONAL INFORMATION

6.1 InLoop maintains security measures designed to provide reasonable protection for your Personal Information against loss, unauthorised access, misuse or disclosure. These security measures include reasonable access controls and data encryption.

6.2 While there is no guarantee that Personal Information transmitted to other websites is fully secure, InLoop will encrypt Personal Information in transit through the use of industry standard encryption methods.

7. MANDATORY DATA BREACH NOTIFICATION REQUIREMENTS

7.1 InLoop will comply with the notifiable data breaches scheme under the Privacy Act (NDB Scheme). The NDB Scheme requires organisations and agencies with obligations under the Privacy Act to notify the Office of the Australian Information Commissioner and impacted individuals about 'eligible data breaches'. A data breach is "eligible" if it is likely to result in serious harm to any of the individuals to whom the information relates.

- 7.2 If InLoop believes there has been an eligible data breach that impacts Personal Information provided by you, InLoop will notify you (or the applicable individual(s) if relevant) as soon as reasonably possible, and keep in contact with you about the nature of the breach, the steps we are taking and what can be done to reduce the impacts to the applicable individuals privacy.

8. CHANGES TO THIS STATEMENT

- 8.1 InLoop may occasionally update this Privacy Statement, including to reflect school and community feedback. InLoop encourages you to periodically check our Sites and review this Privacy Statement to be informed of any changes to how InLoop is protecting your information. An up-to-date version of this Privacy Statement may be found through our Sites.

9. CONTACT INFORMATION

- 9.1 InLoop welcomes your comments regarding this Privacy Statement. You may contact us at support@InLoop.com, including for the following reasons: if you believe that InLoop has not adhered to this Privacy Statement or you have a related complaint; if you seek further information about our privacy practices; or if you seek to access or correct your Personal Information held with us. We will use commercially reasonable efforts to respond to you promptly. We will also let you know if we need any further information.

Where you have a complaint and have contacted us as set out above, we will use commercially reasonable efforts to promptly determine and remedy the applicable issue. Where you believe we have failed to resolve a complaint satisfactorily in accordance with this Privacy Statement, we will provide you with information about further steps you can take.

10. DEFINITIONS

InLoop means InLoop Pty Ltd (ABN 27 114 508 771 and AFSL 471558) including trading under the business names of Flexischools and Flexibuzz

Personal Information includes any information or opinion, about an identified individual or an individual who can be reasonably identified from their information. The information or opinion will still be Personal Information whether it is true or not and regardless of whether we have kept a record of it;

Privacy Act means the Australian *Privacy Act 1988* (Cth)

Sites means the websites, mobile apps, official social media platforms or other online properties through which InLoop offers the Services and which has posted or linked to this Privacy Statement

Services means any products, services, content, features, technologies, or functions, and all related websites, applications and services offered to you by InLoop (including under the business names Flexischools and Flexibuzz)

We, us or our means InLoop