

# **Security and Privacy White Paper**

Last updated: May 9th, 2017

Front Edge Software, hereinafter referred to as "us", "we", or "our", operates <a href="https://www.teacherspet.net.au">https://www.teacherspet.net.au</a> and the database behind the website, any or both of which hereinafter referred to as the "website". The website is used by schools to allocate students into classes following multiple class-allocation rules.

This document discloses our policies regarding the collection, use and disclosure of information about the schools, teachers (including administrative staff in schools) and students. Such information is hereinafter referred to as "customer information".

### What customer information is collected?

- 1. For the school to register an account in the website, the following information about the school must be collected:
  - School name
  - Postal address
- For a teacher to administer the school account or use the website, the following information about the <u>teacher</u> must be collected:
  - Full name
  - Phone number
  - Email
- 3. For the site allocate students into classes, the following information about the <u>students</u> must be collected
  - Full name
  - Grade
  - Current class<sup>[2]</sup>
- 4. For the website to allocate students into classes, the following information about the <u>students</u> MAY<sup>[1]</sup> be collected<sup>[3]</sup>
  - Academic level<sup>[2]</sup>
  - Behaviour<sup>[2]</sup>
  - Faith<sup>[2]</sup>
  - Gender
  - Special need<sup>[2]</sup>
  - Full names of friends that each student desires to have in his/her new class



- [1] There is a category of student details that are optionally collected whether the website requires a particular student attribute in this category, such as academic level, depends on whether the school intends to use this attribute to affect the class allocation result. For example, if the school indicates to the website that it intends to evenly spread students with different academic levels across the class, then the website will require the academic level of each student to be provided. Otherwise the student academic levels will not be collected.
- [2] It is up to the school to decide what values to provide for the attribute. For example, for academic level, one school may use "1", "2" and "3" while another school may use "A", "B" and "C".
- [3] With more class-allocation rules/criteria being added to the capability of the website in the future, more types of student attributes may be collected by the website.

## Managing user access

The website works in a shared responsibility security model. We are responsible to safeguard the website and database so that no party except for our own authorized IT staff can access the data without going through the school user accounts.

Each school is responsible to manager its own user accounts and their access to the school's own data:

- The person who registers the school account becomes the primary administrator of the school account. He/she can then
  - Add more school administrators and teachers
  - Assign teachers access to student data in certain grades
  - Deactivate other administrators and teachers to prevent them from logging into the website.
- All school administrators have the same right except that no one can deactivate the primary administrator.
- Teachers can access or enter student data in the grades to which they have been assigned access by the administrators, and perform the core business of the website, which is class allocation.

On our side, only authorized employees have access to the system. We take all necessary measures to safeguard our login credentials.

All user logins and activities, of both school users and ours, are logged. We periodically review the access logs to identify potential unauthorized and improper access.

## **Data security**

All data being exchanged between customer's web browsers and our website are encrypted using HTTPS protocol, which is used by most of the secured websites around the world, such as online banking websites, eBay and Amazon.

The collected customer information is stored in a Microsoft SQL Server database. The website and the database are both hosted inside the Microsoft Azure cloud, where Boeing, Apple, eBay and other enterprises host their online solutions. Both the website and the database are hosted as Azure



managed services, which means Microsoft is responsible to maintain their security and availability, such as safeguarding the physical and networking access, backup and failure recovery. See <u>Trusted Cloud: Microsoft Azure Security, Privacy, and Compliance</u> for details on Microsoft Azure's security, privacy and compliance model.

All customer information is segregated by schools. One school cannot access any information about another school, including the fact that another school has an account in the website.

Data within a school is further segregated by grades. Unless explicitly assigned the right to access a certain grade by the school administrator, a school teacher cannot access any data of any grade.

The security of customer information is paramount to us. However no method of transmission over the Internet or method of electronic storage is 100% secure. We take no responsibility for any breach of privacy incurred in spite of all the precautions and safeguarding measures outlined in this document.

#### Use of the customer information

The website is a "dead end" for all customer information. All business process that uses the customer information runs within the website, which are hosted within and protected by the Microsoft Azure cloud. There is no need to transfer any information stored in the website to any other device, environment or person and we never do so.

We never provide or allow access to any customer information to any third party.

We may use the teacher's contact information to contact them with newsletters, marketing or promotional materials.

When requested by the teacher, the website sends automated emails to the students to invite them to pick their own friends on the website. Apart from this use case, we never contact any student.

The website offers the following capabilities for the schools:

- 1. Download all student data onto user's own computer as an Excel spread;
- Delete all student details from the website and any time;
- Upload the downloaded spreadsheet back to the website.

All can be done in a few mouse clicks. To minimize our hosting fees, we encourage the schools to only keep student data in our website for a very short period. They can upload the needed student data into the website, perform the class allocation, download the result, download the student data into their own computer just in case they need to redo the class allocation in the future, then purge the student data from the website. The whole time when the student data is in our website can be as short as a few hours.

#### Cookies

Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and stored on your computer's hard drive.



Like many sites, we use "cookies" to collect information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Site.

## Changes to this privacy policy

This Privacy Policy is effective as of 15 January 2017 and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being released.

We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the Service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us, or by placing a prominent notice on our website.

#### Contact us

If you have any questions about this Privacy Policy, please contact us.