



Acapella recognises the importance of protecting the privacy and rights of individuals in relation to their personal information. This document is our Privacy Policy. It tells you what, how and why we collect, hold, use and disclose your personal information.

1. What is personal information?

Personal information is any information that relates to an identified or identifiable living individual.

2. What personal information do we collect and hold?

2.1. If you are a **teacher**, an **education professional**, or an **educational administrator**, we may collect and store the following types of personal information about you:

2.1.1. Class 1 Privacy Data

- your name;
- your work and/or home mailing or street addresses;
- your work and/or personal email addresses;
- your telephone number(s);
- your age or birth date;
- your profession, occupation or job title;
- any professional bodies you belong to that are relevant to your work with students;
- the schools with which you have a professional or employment relationship;
- your education and qualifications that are relevant to your interaction with children;
- your areas of experience and expertise that are relevant to your interaction with children;
- details of the products and services you have purchased from us or which you have enquired about, together with any additional information necessary to deliver those products and services and to respond to your enquiries;
- any additional information relating to you that you provide to us directly through our websites or indirectly through use of our websites or online presence, through our representatives or otherwise;
- information you provide to us through our service centre, our customer support portals, customer surveys or visits by our representatives from time to time; and
- data that we gather through your interaction with our products

2.1.2. Class 2 Privacy Data

- links to the identities of children and students who use an Acapella product;



2.2. If you are a **parent, carer or guardian**, we may collect and store the following types of personal information about you:

2.2.1. Class 1 Privacy Data

- your name;
- your home street address;
- your personal email address;
- your telephone number(s);
- your credit card, debit card or other payment method details;
- your date of birth;
- any qualifications you have that are relevant to teaching or supporting your child;
- details of the products and services you have purchased from us or which you have enquired about, together with any additional information necessary to deliver those products and services and to respond to your enquiries;
- any additional information relating to you that you provide to us directly through our websites or indirectly through use of our websites or online presence, through our representatives or otherwise; and
- information you provide to us through our service centre, our customer support portals, customer surveys or visits by our representatives from time to time.

2.2.2. Class 2 Privacy Data

- links to the identities of your child or children or student(s) who use an Acapella product;
- links to schools, teachers, consultants, administrators who are involved with the Acapella product(s) used by your child or children;

2.3. If you are a **child or student**, we may collect and store the following types of personal information about you:

2.3.1. Class 1 Privacy Data

- Your postcode, State and Country;
- Details of your disabilities as far as they impact on your reading, general learning ability and/or your physical ability to respond to software instructions or requirements;
- If you are colour blind, and details of the type and severity;
- data from Acapella products that may record keystrokes and keys pressed including: latency times, details of books read, details of words read, detail of errors made, and other data related to learning progress, results of tests, rewards points earned and used, games progress, and other data that may allow us to enhance your learning experience;
- details of settings in Acapella products at the time data was collected;



- if you use an AAC communication device that is not situated on an iPad, and details of the device;
- if you use AAC communication software situated on their iPad, and details of that software;
- Any physical environment data, that may be relevant to the analysis of data, and may include:
 - if you use a keyguard;
 - if the iPad you use is enclosed in a protective case, and details of the case;
 - if you are seated in a wheelchair when using Acapella products;
 - Whether the iPad you use is fixed by a device or frame to make it stable and accessible;
 - If your iPad is fixed to a wheelchair, what is the relationship of the centre of the iPad to the centre of the wheelchair (i.e. is it centred or off-centre?);
 - if you use one or more switches for input, and how many.
 - if you use eye tracking technology;
- the date the relevant data was collected.

2.3.2. Class 2 Privacy Data

- your name;
- links to your School;
- links to your teachers (past and present);
- links to your parents or guardians and their contact details
- your birth date;
- links to schools, teachers, consultants, administrators who are involved with the Acapella product(s) used by you;
- any additional information relating to you that you, your parent, carer, school or teacher provide to us directly through our websites or indirectly through use of our websites or online presence, through our representatives or otherwise; and
- information you, your parent, carer, school or teacher provide to us through our service centre, our customer support portals, customer surveys or visits by our representatives from time to time.

3. How do we collect and hold your personal information?

We collect your personal information directly from you unless it is unreasonable or impracticable to do so. When collecting personal information from you, we may collect in various ways including:

- When you interact with an Acapella product;
- through your access and use of our websites;
- during conversations between you and our employees or representatives;



- when you complete a survey;
- when you complete an application or purchase a product
- We may also collect personal information from third parties, including from third party companies such as customers, credit reporting agencies, law enforcement agencies and other government entities.

Personal information which we collect is stored by us and by third party service providers which provide data storage and hosting services to us and may be located in a number of different countries. Where appropriate, we may combine or share any information that we collect from or about you with information collected by any of our related entities. For more information on how we secure your personal information, please see section 10 below.

4. What happens if we can't collect your personal information?

If you are a **teacher** or **parent** and do not provide us with the personal information described above, some or all of the following may happen:

- we may not be able to provide the requested products or services to you, either to the same standard or at all;
- we may not be able to provide you with information about products and services that you may want, including information about discounts, vouchers and promotions;
- we may be unable to establish vital links between you, schools, teacher, parents, and students, meaning that some or all Acapella software and services may be functionally impaired or inoperable;
- we may be unable to provide you with useful professional data, including performance comparisons, normative and comparative assessment data;
- we may be unable to tailor the content of our websites to your preferences and your experience of our websites may not be as enjoyable or useful;
- We may be unable to complete financial transactions with you which may cause loss of access to or loss of functionality of software provided to you by Acapella.

If you are a **child** or a **student** and you, your parent, carer, guardian, school, or teacher do not provide us with the personal information described above, some or all of the following may happen:

- we may not be able to provide the requested products or services to you, either to the same standard or at all;
- we may be unable to establish vital links between you, your school(s), and your teacher(s), meaning that some or all Acapella products may be functionally impaired or inoperable;



- we may be unable to make necessary background operating adjustments to products based on machine learning and data analysis;
- we may not be able to optimise your user experience to suit your personal abilities and physical capabilities; and
- you may not be able to play the reward games that are built into some products.

5. Do we use cookies on our websites?

In some cases, we may also collect your personal information through the use of cookies. When you access our website, we may store 'cookies' (small files containing a unique ID number and data) on your computer. Cookies enable us to measure traffic patterns and to understand how you use our website. We use this to research our users' habits so that we can improve our online products and services. Our cookies do not collect personal information and do not collect any data for use in targeted advertising. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them.

We may log IP addresses (that is, the electronic addresses of computers connected to the internet) to analyse trends, administer the website, track user's movements, and gather broad demographic and geographic information. For more information on our use of cookies, see our cookie policy.

6. For what purposes do we collect, hold, use and disclose your personal information?

We collect personal information about you so that we can perform our business activities and functions and to provide best possible quality of customer service and user experience.

If you are a **teacher** or **parent** we may collect, hold, use and disclose your personal information for the following purposes:

- to help us provide products and services to you and to send communications requested by you;
- to help us answer enquiries and provide information or advice about existing and new products or services;
- to enable us to provide you with access to protected areas of our websites;
- to assess the performance of our websites and to improve the operation of our websites;
- to conduct business processing functions including providing personal information to our related bodies corporate, contractors, service providers or other third parties who perform functions required for the functioning of the business;
- for the administrative, marketing (including direct marketing), planning, product or service development, quality control and research purposes of Aacapella, and its related bodies corporate, contractors or service providers;
- to add richness and depth to the data we collect on child or student progress and performance where this might add to its usefulness for research purposes;



- to allow automated adjustments to our products using artificial intelligence to improve the user experience and learning opportunities;
- to provide your updated personal information to our related bodies corporate, contractors or service providers (see clause 7 below);
- to update our records and keep your contact details up to date;
- to process and respond to any complaint made by you; and
- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country (or political sub-division of a country).

Your personal information will not be shared or disclosed other than as described in this Privacy Policy.

No personal or confidential data will be sold, rented or otherwise shared or distributed for financial gain to anyone, anywhere, at any time.

If you are a **child** or **student** we may collect, hold, use and disclose your personal information for the following purposes:

- to allow us to dynamically adjust the software to optimise its educational functionality and to maximise user engagement;
- to allow us to compile reports on your progress and performance to your parents and teachers;
- to allow us to make suggestions and observations to your parents and teachers regarding your use of Aacapella software and other services;
- to allow us to conduct research that advances knowledge in the areas of AAC and education;
- to further the general body of knowledge related to AAC and education by making data available to recognised non-commercial research organisations.

7. To whom may we disclose your information?

All personal and confidential data is stored in a secure encrypted database. We restrict access to and disclosure of your data according to its classification:

7.1. Class 1 Privacy Data may be disclosed to:

- our employees, related bodies corporate, contractors and service providers for the purposes of operation of our website, our software and products, our business, fulfilling requests by you, and to otherwise provide products and services to you including, without limitation, web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants;



- third parties with whom Aacapella has commercial relationships, for business, marketing, and related purpose, but only when such disclosure is related to, and to the benefit of, the business carried on by Aacapella, and only when such disclosure is used by the third parties for the benefit of Aacapella;
- third parties who undertake independent data analysis on behalf of Aacapella.
- research organisations that use the data to further knowledge and understanding of the education and medical domains relevant to the students using Aacapella products, and under the following conditions:
 - disclosure will only be allowed when its use is regulated by a properly constituted ethics committee; and
 - all data provided will be de-identified.
 - any other organisation for any authorised purpose with your express prior written consent.

7.2. Class 2 Privacy Data may be disclosed to:

- Aacapella employees with appropriate security clearance; and
- any organisation for any authorised purpose with your express prior written consent.

7.3. We may disclose your personal and confidential information to our related entities and third-party suppliers and service providers in a number of countries. We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to that information.

7.4. Although Aacapella will not disclose your data except as documented in clause 6, our websites may contain links to the websites of external organisations and third parties. We make no representations or warranties in relation to the privacy practices of any third-party website that you may visit as a result of activating a link in one of our websites, and we are not responsible for the privacy policies or the content of any third-party website. Third party websites are responsible for informing you about their own privacy policies and practices.

8. Will my information be used for direct marketing?

We may use your data to send you direct marketing communications and information about our products and services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS, and email, in accordance with applicable laws. If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so.

You may opt-out of receiving marketing communications from us by contacting us (see the details below) or by using opt-out facilities provided in the marketing communications and we then ensure that your name is removed from our mailing list.



We will not provide your personal information to any other organisation for the purpose of direct marketing, except where that direct marketing is undertaken on our behalf and is directly related to our business.

9. How can you access and correct your personal information?

You may request access to any personal information we hold about you at any time by contacting us (see the details below). Where we hold information that you are entitled to access, we will provide you with suitable means of accessing it (for example, by emailing it to you). We may charge you a fee to cover our administrative and other reasonable costs in providing the information to you. We will not charge for simply making the request and will not charge for making any corrections to your personal information.

There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would have an unreasonable impact on the privacy of others or if it would be unlawful. In that case we will give you written reasons for any refusal.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may ask us to amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment, then we will add a note to the personal information stating that you disagree with it, and the details of your request for amendment.

10. What is the process for complaining about a breach of privacy?

If you believe that your privacy has been breached, please contact us using the contact information below and provide details of the incident so that we can investigate it and respond to you about your concerns. We have a formal process for handling and responding to a suspected data breach.

11. How do we protect your data from unauthorised access and use?

We take reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorised access, modification or disclosure. We will hold your information in electronic form, and it will be protected by encryption to security industry standards. If you provide us with a hard copy of any personal data, we will transfer that data to an electronic form as soon as is practical, and we will then destroy all hard copies of the information.

Your personal and confidential information will be destroyed or de-identified when it is no longer needed or useful to our business or to research entities who may use it for improving knowledge and understanding of the fields we work in.

For the sake of clarity, we will delete and destroy all Class 2 Privacy Data when it is no longer required, and we will retain some or all Class 1 Privacy Data at our sole discretion.



12. How can you contact us regarding this privacy policy or any other privacy issue?

If you have any questions about this privacy policy, any concerns or wish to make a complaint regarding the treatment of your privacy or report a possible breach of your privacy, please use the contact link on our website or contact our Privacy Officer using this link: dataprivacy@acapella.com.

We will treat your requests or complaints confidentially and with respect. Our representative will contact you promptly after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will ensure that your complaint is resolved in a timely and appropriate manner.

13. Changes to our privacy policy

We may change this privacy policy from time to time. Any updated versions of this privacy policy will be posted on our website. When there is a significant change to this policy that might affect you and/or your data we will endeavour to contact you to advise you of the change.

We may periodically ask you to reconfirm your acceptance of our privacy policy and to confirm information we hold about registered students.

This privacy policy was last reviewed on 16 August 2024.