Music Ecademy (Ecademy Limited) Privacy Policy

By purchasing a licence for Music Ecademy you acknowledge that you have read and understood this privacy policy.

Music Ecademy does not provide students with any way of communicating directly with each other or any other person (including teachers).

Music Ecademy does not require any personal information for students to set up a Music Ecademy account. However to set up an account for a child we do require the contact details of an adult, either parent or teacher (if purchasing on behalf of a school)

What personal information we may collect about you:

We may have collected personal information about you from the following people or places (including within the last twelve months):

Students:

If you use Music Ecademy through your school, then we may have collected the following information:

- Your first and last names
- The name of your school
- Your school ID
- Your classes

If you hold an individual licence (rather than using the school licence), then we may collect this information directly from you or from the card holder who purchases the licence on your behalf.

We do not require any personal information to use our website if you do not wish. If you do not wish to provide your name we can provide aliases. You also do not need to provide an email address, although this means you will not be able to reset your own password. However, we can always do this on your behalf if you email us or your teacher can.

We may also collect information about you when you contact us for help so that we can answer your questions (including details about your questions and an email address to contact you with the answers, if required.)

When you visit our website, it will automatically collect some information about you:

- your answers and results on lessons, quizzes and games
- your use of the website (for example, when you login and how long you spend completing lessons)
- details about your device (for example, your internet (IP) address, your location and the type of browser that you use, and its identity in the form of a "cookie").

Teachers:

When we sign you and your school up to our services, we will also collect some of your personal information (e.g. first and last names, job and title, school name and address, email address and contact number, and billing or account details).

Parents:

We may collect your email address (either directly or via the relevant school), name and details of which student is your child. In some cases, we may also collect log in details for you if you log in to our services. If you purchase an individual licence for your child to use our services, we will also collect your address and payment information.

In order to collect some of the data described, we may use cookie technology on our website. A cookie is a small piece of information which is sent to your browser and stored on your computer's hard drive, mobile phone or other device. Cookies do not damage your computer. You can set your browser to notify you when you receive a cookie. This enables you to decide if you want to accept it or not. However, some of our services may not function properly if your cookies are disabled.

How long we keep your personal information for and where we store it:

We will keep your information while you are an active user of our services and, provided your school continues to hold a licence, we may keep it for up to 1 year to enable you to reactivate your account and access your learning history as you move between classes.

We regularly review our information retention rules to make sure we are not keeping it for longer than we need to, but you can ask us to remove your information at any time.

An element of the service that Music Ecademy provides is the ability to track your learning journey across multiple years. In the event that you (or your school) choose not to re-subscribe we will retain your account and historic learning data to ensure that if you return in the future, the work you have previously completed is still available and associated with your account.

If your account remains inactive for a period of 1 year we will delete your account and your data.

You or your school may notify us that you no longer require us to retain past learning data before this 1 year period has passed, in which case we will take this action sooner.

Our company is established and headquartered in New Zealand. Data is stored in Sydney, Australia by Google Cloud. We may use third parties in other countries to process data for us.

How we may use the information we collect:

In most cases, we act as a "data processor" and use your information only as instructed by your school to make sure that we can provide our services to you. We may need to use, collect, store or otherwise process your information as explained below:

Students:

For the purpose of providing services as required by our contract with your school (or under your individual licence):

We will use the information that we have collected about you to:

- maintain a record of your learning on our platform
- help your studies by sharing your e-learning progress with your teachers (for example, that you have completed tests, your scores on tests and your competition performance);
- maintain and improve our services. For example, we can use statistical information about how long all students spend on a lesson to make sure that the lesson or quiz is not too simple or difficult. Such information will only ever be used on a grouped basis so that you (or your classmate) will never be identified individually;
- use the information that our website collects about you to improve your experience while using our services – for example, to identify that it really is you;
- identify you when you contact us for help on technical problems (for example if you report a problem with our website or the content) or to email you a new password when you have asked for one.

Teachers:

For the management and administration of our contract:

We will use the information that we have collected about you to provide our services, and to carry out administrative tasks such as managing our relationship with your school and for billings and invoicing purposes, as may be necessary in order to perform our contract with your school.

For marketing purposes and our legitimate business interests:

We will also use the information to communicate with you where we have a legitimate interest to do so – for example, sending you information about new learning resources and products that are being made available. You can opt out of receiving such communications at any time by clicking the unsubscribe link or following the instructions in the email.

Parents:

For the purpose of entering into a contract and for marketing purposes:

We will use your information for payment purposes.

We will also use the information and the email address you provided on sign up to communicate with you where we have a legitimate interest to do so – for example, sending you information about new content and updates, or information about resubscribing or ending your subscription. You can opt out of receiving such communications at any time by clicking the unsubscribe link or following the instructions in the email.

Whether we will give your information to anyone else:

We may also need to use your information to protect ourselves from criminals or fraudsters and in some circumstances, we may also need to share or use your information to make sure that we follow the law. We may also use or transfer your information to a successor entity in the event that we sell or transfer all or a portion of our business or assets (including in the event of a merger, reorganisation, spin-off, dissolution or liquidation) and we will endeavour to ensure that the successor entity applies this policy to such information. We will keep your personal information safe and will not give it to any third party except as explained in this policy or where we are allowed to do so by law. [We do not sell personal information.]

Your rights and responsibilities:

While we do our best to keep your personal information safe and private by following high standards, no security and safety system is 100% secure. You have to play your part in ensuring that your username and password are kept safe, and tell us when your account has been accessed without permission.

You may have the right to ask us to:

- give you a copy of your personal information that we have collected
- update or correct any personal information about you that is wrong
- stop collecting your personal information
- remove your personal information from our records

Rights and responsibilities for parents of children under the age of 13:

COPPA provides certain rights and responsibilities to parents of children under the age of 13 that provide us with personal information.

This section of the policy only applies to children under the age of 13.

We do not permit children under the age of 13 to create an account or provide us personal information without your or the school's verifiable consent. Such consent may be provided, for example, through teachers providing a secure class join code to permit a student to set up an account. If you believe we have collected information from a child under age 13

without such consent from the school, please contact us at info@musicecademy.com so that we may delete the information as soon as possible.

We will not require a child under the age of 13 to provide us with more information than is reasonably necessary to use our site and services. **We do not require any personal information to set up a Music Ecademy account for a child.**

At any time, you may review your child's personal information maintained by us, including requiring us to correct or delete the personal information and/or withdrawing and refusing to permit us from further processing your child's information. You can also refuse to allow us to disclose information to third parties that is not necessary for the use of our site and services. You can do this by sending us an email at info@musicecademy.com. To protect the privacy and security of your child, we may require you to take certain steps to verify your identity.

Data Security Measures:

Security of Your Personal Information: We take the security of your personal information seriously. To protect your personal information from unauthorised access, use, or disclosure, Music Ecademy employs a variety of security technologies and procedures. Our data is stored on secure servers and protected by encrypted passwords and firewall technology. We regularly update and test our security technology and train our staff to ensure the highest level of protection. Despite these measures, please note that no method of transmission over the Internet or method of electronic storage is 100% secure.

Complaint Process for Privacy Breaches:

Complaints and Disputes: If you have a complaint about how we have handled your personal information or believe we have breached your privacy, please contact us at info@musicecademy.com providing details of the incident so that we can investigate it. Our procedure is as follows:

1. We will acknowledge receipt of your complaint within two business days.
2. We will investigate the issue and respond to you within 30 business days after the complaint has been made.

Disclosure of Personal Information to Overseas Recipients:

International Data Transfers: Music Ecademy operates globally, Our company is based in **New Zealand** and our data is stored in **Sydney, Australia**

We will only transfer personal information to countries (Australia, New Zealand) where we are satisfied that an adequate level of protection is in place to protect your information, and where we have put in place appropriate safeguards to ensure such protection.

By agreeing to our privacy policy, you consent to the transfer, processing, and storage of your personal information in these countries.

Our contact details:

If you have any questions about our services and you have signed up through a school please ask your teachers first. However, you can always contact us at the following details if you do have any questions.

Email: info@musicecademy.com
Phone: +64 4 889 2224
Address: Suite 8877, Level 1, 6 Johnsonville Road, Johnsonville, Wellington 6037, New Zealand

List of sub-processors

Below is a list of sub-processors we work with.

Sub-processor	Purpose	Categories of personal data	Location of Processing
Alphabet Inc (Google)	Office software, email provider, website analytics, cloud storage	Staff: names, email addresses	USA
Google Cloud (Alphabet Inc)	Cloud hosting	Personal data contained in user account information. (staff - name, email address; Students (optional): account usernames, email addresses, user data)	Australia, USA
Jetpack	Security and performance	No direct personal data- only anonymized website visitor data	USA
Mailchimp	Email marketing	Staff: names, email addresses	USA
PayPal, Inc	Payment processing	Payment data including transaction details	USA
Siteground Ltd.	Website Hosting	Website visitor data, form submission data	UK/EEA
Streak CRM	Marketing and CRM services	Staff and customers: names, email addresses, contact details	USA
Stripe	Payment processing	Payment data including transaction details	USA
Xero Limited	Accounting and invoicing	Customers: names, email addresses, billing addresses, payment details	New Zealand, USA