



# Privacy Policy

Personal Data Privacy

---

## Americas

A large, faint, light blue version of the Reach logo is positioned in the bottom right corner of the page. It is a stylized graphic consisting of three overlapping shapes: a red one at the top, a teal one on the left, and an orange one on the right, arranged in a circular pattern.

# DATA PRIVACY POLICY

## Reach Student Life Management System



Last updated: 1<sup>st</sup> March 2023

This statement outlines the Personal Data Privacy Policy for the developed Reach Student Life Management System. It relates to managing personal information provided to or collected by Reach.

From time to time, reach Student Life Management System may review and update this Privacy Policy to take account of new laws and technology, changes to the operations and practices, and ensure it remains appropriate to the changing school environment.

Reach Student Life Management System is committed to protecting the privacy of personal information. This Privacy Policy embodies this commitment and applies to personal information collected by Reach Student Life Management System and its contractors and agents.

All personal information collected by Reach Student Life Management System is protected by the COPPA Act of 1998 (updated in 2013) and the PIPEDA Act of 2001.

### 1) Collection of Personal Information

The type of information that Reach Student Life Management System collects and holds includes (but is not limited to) personal information, including sensitive information about:

- Students and parents and/or guardians ("Parents") and hosts before and during the course of a student's enrolment at a School;
- Staff and other people who contact the School for managing School Boarding House activities.

#### **Personal Information about Parents, Students and Guardians;**

Reach Student Life Management System will collect personal information about an individual from schools who use REACH. Parents and Students will also have a capacity to update that information from time to time with secure, direct access to REACH.

#### **Personal Information about School Staff and other third parties;**

Reach Student Life Management System will collect personal information about an individual staff member or third party associated with school boarding activities from schools that use REACH. These individuals may also have the capacity to update that information from time to time with secure, direct access to REACH.

#### **Photographs:**

Reach Student Life Management System will, as part of the activities of REACH, utilize photographs of individuals provided by the School or by the individual themselves for system identification purposes. Photographs of school activities, staff, students and other personnel may be posted on REACH by authorized school administration staff for the school's internal use and promotional use.



Reach Student Life Management System will not use any photograph provided by the school for anything other than its intended purpose without consent from the individual or individuals identified in the photograph.

## **2) Data Storage**

REACH User Portals and applications are hosted in data centres that reside physically in United States, Canada, EU, UK and Australia. This means your data is always secured and processed exclusively in your country of origin.

## **3) Use of the personal information provided**

The primary purpose of collecting personal information of students, parents, guardians, hosts and school staff is to enable REACH to provide an activity management system which assists schools in managing their boarding house activities and their duty of care. This data is maintained in a secure environment with multi-layered security protocols for data protection.

This data is limited to authorized school personnel and individuals whose personal data is on the system. Security protocols restrict an individual's access to personal data their information, or information relating to individuals the school has formally associated them with on REACH.

### **The purposes for which Reach Student Life Management System uses the personal information of students, parents, guardians and staff include:**

- Keeping Parents and staff informed about matters related to a student's activities in the School, through correspondence, news alerts and activity notifications, and
- Satisfying the School's legal obligations and allowing the School to discharge its duty of care.

Personal information collected by Reach Student Life Management System will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose unless agreed otherwise, or where the use or disclosure of that personal information is allowed or required by law.

### Images of individuals

Images of the School's students, staff, parents, guardians and other visitors may be used by authorized school administration staff using REACH. Only authenticated users may insert photographs into the REACH system.

Reach Student Life Management System will not use any photograph or images provided by the School without consent from the individual or individuals identified in the photograph or image.



#### **4) Disclosure of personal information**

Reach Student Life Management System will not share personal information held about an individual with any third party without school approval for the sharing of data with that third party except in the following instances;

- REACH may transfer personal information via direct data connections with a school's existing database or other computer systems to maintain accurate and co-ordinated school records,
- The disclosure is required or authorized by or under law,
- The disclosure is reasonably necessary for the enforcement of the criminal law; or
- We have reasonable grounds to determine that the disclosure is necessary to prevent or lessen a serious and imminent threat to the life or health of the individual concerned or another individual.

#### **5) Protection of personal information**

Reach Student Life Management System manages the security of personal information with physical, electronic and procedural safeguards.

We urge individuals to take every precaution to protect their personal data when connecting to REACH by regularly changing passwords, using alpha-numeric combinations and ensuring that a secure browser is used to access REACH.

Reach Student Life Management System has in place several data protection steps to protect the personal information that is contained in REACH. These include ;

- Servers that are connected to UPS power and have RAID disk arrays for greater reliability
- Servers that are fully locked down, running only essential services, with CISCO firewalls and CISCO routers used to secure data
- Servers are backed up daily and tapes stored in a fireproof safe
- Servers housed in premises on a secure floor with 24 hour PIN access

#### **5) Checking and updating personal information held by REACH**

Under most Federal/State/Provincial Privacy Acts, an individual has the right to obtain access to any personal information which REACH holds about them and to advise of any perceived inaccuracy. Students will generally have access to their personal information through their Parents or Guardians.

Individuals with personal data on the REACH system and who are approved by the school administrator of REACH may have access to their own personal data and, in some cases, to other individuals with whom the school administrator has associated them in REACH.

REACH stores personal information no longer than necessary. If a school ceases to use REACH, it will be provided with its REACH database files. The school may be required to hold this data for a minimum specified period, however all personal information relating to individual students, parents, guardians,



hosts and staff will be removed from REACH and Reach Student Life Management System will destroy any remaining digital records that it holds for that school.

## **6) Matters relating to the use of the REACH Cloud port and REACH website**

### **Information Collected:**

When you view and use the REACH web portal or the REACH website, the following information is collected for statistical purposes:

- The Internet Protocol (IP) address of the machine from which you are connecting
- Your top-level domain name (for example .com, .cloud, .gov, .au, .uk, etc)
- The date and time of your visit to the site
- The pages that you accessed and any documents downloaded
- The previous site you had visited
- The type of browser you are using and the operating system that it runs on.

### **Use of information collected:**

Your email address and mobile phone number will only be used for the purpose for which it has been provided to us by the school or the individual. They will not be added to a mailing list or used for any other purpose without your consent.

### **Cookies:**

The REACH web portal and the REACH web site use "Session" cookies to aid in the ease of browsing through the site. In this situation, the cookie identifies the browser, not the individual. No personal information is stored within the cookies of Reach Student Life Management System.

You can manually disable cookies at any time. Simply check your web browser's "Help" function to find out how to disable cookies in your web browser. Disabling cookies will not impact your ability to access the REACH web portal or the REACH website.

### **Google Analytics:**

REACH User Portals are not monitored using any external tracking programs. In portal analytics are utilised to monitor user traffic flows and movements however all data is maintained within our own server network and the data is not shared with any third party.

Google Analytics is used by Reach Student Life Management System to collect website visitor information for our various websites. This includes the REACH website but it does not include any REACH User Portals.

Google Analytics uses first-party cookies and JavaScript code to help analyse how users use the site. It anonymously tracks how visitors to these sites interact with the websites. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purposes of compiling reports on website activity and providing other services relating to website activity and internet usage. You may refuse the use of cookies by selecting the appropriate settings on your browser.



## 7) Complaints

If any person believes that we may have breached their privacy, they may contact us to make a complaint using the contact details below. To ensure that we fully understand the nature of any complaint and the outcome they may be seeking, we prefer that all privacy complaints are made in writing. Complaints should be directed to our Data Security Manager, Brad Gibby, at [brad@reach.cloud](mailto:brad@reach.cloud).

Reach Student Life Management System undertakes to assess and resolve all privacy complaints diligently and promptly, in accordance with the best practices of data privacy.

### **Changes to this privacy policy**

Please note that the privacy policy may change from time to time.

Last updated: 01 January 2023

