

General Data Protection Regulations

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BECOME. LIFE DESIGN PTY LTD
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GDPR Statement

Introduction

Data protection and your privacy matter to us at BECOME. LIFE DESIGN PTY LTD. This document outlines our obligations under the new GDPR Act and ensures that we treat your personal data with the utmost respect.

The EU General Data Protection Regulation (GDPR) act reinforces the 1995 EU Data Protection Directive, strengthening the rights that individuals have regarding personal data.

We are committed to taking every step necessary to protecting your data and have taken measures to ensure that privacy and security protections are built into the service(s) we provide to you.

This policy (together with our standard terms of use and any other documents referred to in it) outlines when and why we collect personal data, how we use it, and the conditions under which we may disclose it to others. It governs how BECOME. LIFE DESIGN PTY LTD ('we') collects, uses, maintains and discloses information we collect about individuals ('you'), and applies to all products and services that are offered by BECOME. LIFE DESIGN PTY LTD.

Should you wish to discuss any part of our GDPR Statement with us, please contact us.

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Privacy - Your Right to be Informed

An important part of the GDPR is the Right to be Informed about what information we have. The following data types are stored and used by BECOME. LIFE DESIGN PTY LTD as part of our normal business activities:

Data Type	Details	
Email Addresses	Purpose	Customer Identification, Marketing, Student Identification
	Retention Period	Perpetual
	Basis for Processing	Legitimate Interest, Consent, Contract
	Source	Website, Social Media, Business Card, Existing Customer
Telephone Numbers	Purpose	Customer Identification, Marketing
	Retention Period	Perpetual
	Basis for Processing	Legitimate Interest, Contract, Consent
	Source	Website, Social Media, Business Card, Existing Customer
Job Title	Purpose	Customer Identification, Marketing
	Retention Period	Perpetual
	Basis for Processing	Legitimate Interest, Contract, Consent
	Source	Website, Social Media, Business Card, Existing Customer
School Address	Purpose	Customer Identification, Marketing
	Retention Period	Perpetual
	Basis for Processing	Legitimate Interest, Contract, Consent
	Source	Website, Social Media, Business Card, Existing Customer
School Name	Purpose	Customer Identification, Marketing
	Retention Period	Perpetual
	Basis for Processing	Legitimate Interest, Contract, Consent
	Source	Website, Social Media, Business Card, Existing Customer
Date of Birth	Purpose	Student Identification
	Retention Period	Perpetual
	Basis for Processing	Legitimate Interest, Contract, Consent
	Source	Teacher, School, or School District

Gender	Purpose Retention Period Basis for Processing Source	Student Profile, Insights report to school Perpetual Legitimate Interest, Contract, Consent Teacher, School, or School District
Student Exploration Notes	Purpose Retention Period Basis for Processing Source	Student Kanban, Teacher can view Identification Perpetual Legitimate Interest, Contract, Consent Student
Student Exploration Activity	Purpose Retention Period Basis for Processing Source	Student Kanban, Teacher can view Perpetual Legitimate Interest, Contract, Consent Student
Full Name	Purpose Retention Period Basis for Processing Source	Customer Identification, Marketing, Student Identification Perpetual Contract, Consent Teacher, School, or System
Preferred Name	Purpose Retention Period Basis for Processing Source	Customer Identification, Marketing, Student Identification Perpetual Contract, Consent Teacher, School
Student Surveys	Purpose Retention Period Basis for Processing Source	Teacher can view, Insights report to school Perpetual Contract, Consent Teacher, School

Lawful Basis

Data Controller/Processor

We are a 'data controller', which means that we (either alone or jointly or in common with other persons) determine the purposes for which and the way personal data are or will be processed. We have overall control over the 'why' and the 'how' of our data processing activities.

Data

Whose Data do we Collect?

We need to collect and use personal data to fulfil our obligations as an organisation. This policy describes how this personal data must be collected, handled, and stored to meet our data protection obligations - and to comply with the law.

We only ask for information about you that helps us to help you, and we do not ask for any information that has no specific purpose.

We store information about:

- Customers
- Suppliers
- Business Contacts
- Employees
- Contractors

Use of Data for Specific Purposes

We may use the personal data you supply for our purposes where we deem it necessary in our legitimate interests.

We will need your consent for some of the activities that may not be covered by our legitimate interests, for example the collection of data via cookies and the delivery of direct marketing through digital channels such as email subscriptions. Where we need to obtain consent, we do so in an open, transparent, and straightforward way so that you know exactly what you are signing up for, why we need your information and how we will intend to use it.

If you are not happy with the way we collect your personal data, you have several rights which you can exercise at any time. Please see the section on 'Your Rights' in this document.

We may use your personal information to help us to exercise or defend any legal claims that may arise.

Below are the ways we may use and process your personal data, although this list is not exhaustive.

- For carrying out our obligations and contracts with us and our customers
- To comply with our legal obligations, including crime, tax, or duties
- For marketing purposes
- To send details of promotions, offers and events

- To communicate with individuals during our business operations
- To enable us to develop and market other services and products
- To carry out satisfaction surveys and testimonial requests
- To conduct online training
- To facilitate our payroll and invoicing procedures
- Other (please state below)
- To provide students' school, teachers, and parents with details on tasks and activities here

Personal Data Types

We collect information to help provide our users with better services. The information we collect, and how we use that information you supply, depends on how you use our service(s), and how you manage your privacy controls. We collect and use the following personal data about our staff and/or customers:

- Email Address
- Other (please state below)
- School Staff: email, phone number, school address, role / title
- Students: email, DOB (to confirm school transfers), gender (aggregate reporting)
- Contractors: email, phone number, address, tax details
- Employees: as required by gov reporting agencies

The Ways we Collect Data

Become Education collects a limited amount of personal data to enable us to fulfil our contractual duties to you or to other organisations. Additional items of information may be needed to help us keep our relationship with you working smoothly.

In the event that you access our website, read an email, or click on a link in an email we send to you, we may also collect certain data automatically or through providing it to us, including data such as your IP address and cookies, the latter of which make your interaction with our website(s) smoother and more intuitive, providing you with a better, more customised experience.

We collect this information from the following sources:

- Directly from the individual
- From our website (including cookies)
- From individuals emailing us
- Other (please state below)
- From schools at the local and enterprise level
- School and staff details are obtained from school / school system web site, email footers from staff

Third-Party Data

In some circumstances, it may be necessary for us to collect and use personal information from a third-party source.

Where appropriate, we may seek more information about you from alternative third-party sources, and always in accordance with any local laws and requirements. This may include market research through a third party, delegate lists from events, and other organisations we may employ to collect this data.

We have taken steps to ensure that we are compliant with GDPR as follows:

- We know how and where this information was compiled
- Consent was sought to obtain this information
- We can prove that consent was sought

- Our organisation was specifically named when the data was collected
- Other (please state below)
- Basic user contact data is provided to us by schools (our customers) so that we may maintain user accounts for staff and students to perform our contracted service
- No student data is obtained or sought from third parties

Sharing of Personal Data

From time to time, Become Education may share personal data with another organisation (another data controller). The circumstances and purpose of sharing this personal data may depend on the nature of the service provided, but we will be clear when this happens, and for what purpose. In all cases, the information sharing will be reasonable and expected, and will be clear who is involved.

If you are concerned about data sharing, contact us and we will be able to tell you whether information is being shared with another organisation. We will explain what the information is, who it is being shared with, and why. Alternatively, you can see our Privacy Statement. You also have additional rights under the GDPR, including the right to access your information, a right to rectification, a right to erase your data, a right to restrict processing and a right to object.

- Third-party service providers where we have an appropriate protection in place
- Marketing technology platforms and suppliers
- Other (please state below)
- Student data is shared only with the school they attend.
- Our marketing platform (CRM) is used to coordinate planning, professional learning, and support for school staff members.
- Our LMS (Learning Management Systems) is used to coordinate planning and professional learning school staff members.

Children's Data

Become Education may process the personal data of children under the age of 16 in its normal business activities. In these cases, we operate in accordance with local laws and requirements at all times.

We operate the following principles when storing the personal data of children under the age of 16:

- We have carefully considered the language of privacy notices
- We have obtained valid consent
- We operate with children in mind from the outset, using data protection by design
- Our processing is fair and complies with the data protection principles

Data Transfer

Data Residency

Become Education processes and stores data in the customer's region does not transfer data out of the customer's region.

Consent

Information about individual's personal or sensitive information has been freely given by the data subject. We also take the following measures to ensure that we obtain explicit consent before using or storing their information:

- Consent was freely given at the point of purchase
- Consent was clearly distinguishable in an accessible, distinguishable manner

Website Data Collection

Become Education may collect a limited amount of data from our website users which we use to help us to improve your experience when using our website and help us to manage the services we provide.

We may also use data from your use of our websites to enhance other aspects of our communications (including marketing) with you. Any communications to and from Become Education and you may be reviewed and monitored as part of internal or external investigations or for legal reasons as required to under law.

The data we collect may consist of the following information:

- IP Addresses
- Cookie Information
- Location information
- Search terms and phrases
- Name
- Age/Date of Birth
- Gender
- Contact Details (including Email Address)
- User comments

We may collect information from our website users that include details of the apps, browsers, and devices you use to access our services.

This information is collected when a device you are using contacts our servers, which could include websites and/or apps. This information includes IP addresses, unique identifiers, browser types/device, and operating system. Data may also include the date, time, and referrer URL of your visit.

When you use our website to submit comments, we may store the information you provide to tailor your visit and to provide additional features and services that you may be interested in.

Cookies

A cookie is a small file that is sent to your device when you visit a website. It allows websites to recognise you when you next visit the website and helps to customise the information you see when you revisit. Cookies may store user preferences and other information that helps to provide a better service whilst using the website.

You can configure your browser to refuse all cookies, or to display which cookies are being sent to your device. Although you can disable cookies, some features or services may not function properly.

Individual Rights

Right to Object

- We will stop processing personal data upon receiving notification to do so
- We stop processing data for direct marketing right away, and without charge
- Personal data may be in the interest of a public interest task, and we may not be required to comply

Right to Access

- Individuals have the right to access their personal data
- We may store supplementary information, which we will supply when requested to do so
- A copy of the data can be provided free of charge
- We may charge a reasonable fee to comply with requests for further copies of the same information
- We will provide the information without delay, within one month of receipt of the request
- We may extend the period of compliance by an additional two months where requests are complex or numerous
- We may charge a reasonable fee if a request is manifestly unfounded or excessive
- We may refuse to respond if a request is manifestly unfounded or excessive
- If we refuse, we will explain why, and inform them of their right to complain
- We provide information in a commonly used electronic format
- We verify the identity of the person making the request using 'reasonable means'
- Individuals can access our self-service system to provide the data with direct access to their information
- Where we process a large quantity of information about an individual, we may ask to specify the information the request relates to

Right to Erasure

- We can recognise a request for erasure, and understand when the right applies
- We respond to a request for erasure without undue delay, and within 1 month of receipt
- We place particular emphasis on the right to erasure if it relates to data collected from children
- We have appropriate methods in place to erase information

Security

- We consider the state of the art and costs of implementing security measures
- We review our information security policies and measures at regular intervals
- We make improvements to our security policies wherever necessary
- We understand the requirements of confidentiality, integrity, and availability for the personal data we process

Security Measures

BECOME. LIFE DESIGN PTY LTD has implemented adequate security measures to protect personal information from unlawful access, theft, disclosure, or loss.

If you suspect a loss, unauthorised access, or misuse of your personal information we hold about you, please let us know immediately. Our details can be found on this document.

The following measures have been implemented:

- Data encryption
- Server maintenance
- Software version updates
- Data integrity and resilience
- Security testing measures
- Pseudonymisation (artificial identifiers)

Data Anonymisation

BECOME. LIFE DESIGN PTY LTD may anonymise data to help protect your privacy. Anonymisation strips data of any identifying information. By anonymising the data we store, it is impossible to connect personal data to an identifiable person.

CCTV and Cameras

BECOME. LIFE DESIGN PTY LTD does not store personally identifiable video or images from CCTV cameras, body cameras, unmanned aerial systems or other systems that capture information of identifiable individuals or information relating to individuals.

Data Breaches

Breach Identification

We have taken steps to prepare a series of actions in the event of a breach of personal data from our systems.

- We know how to recognise a personal data breach
- We have allocated responsibility for managing breaches to a dedicated person or team

Data Breach Procedures

BECOME. LIFE DESIGN PTY LTD has procedures in place to report a breach of data security to the regulator within 72 hours of becoming aware of any breach. We undertake the following procedures:

- Breaches are investigated at the earliest opportunity
- We may require assistance from data processors
- We notify individuals if there is a significant risk to their rights and freedoms

Accountability

Our Accountable Practices

New GDPR legislation by the Information Commissioner's Office state that accountability should be high on the list of priorities for organisations. At we take accountability seriously and take responsibility for complying with GDPR at the highest management levels and throughout our organisation.

- We take responsibility for complying with the GDPR at the highest management and throughout our organisation
- We adopt and implement data protection policies where proportionate
- We take a 'data protection by design' approach, putting data protection measures in place from the outset
- We implement appropriate security measures to protect data
- We record and report personal data breaches to the appropriate authorities
- We have appointed a Data Protection Officer
- We review and update our accountability measures at appropriate intervals