

# Privacy Policy

This policy is used to inform users of LeadMe Learning how the app collects, uses, and shares user data, and with whom. The Personal Information that we collect is used for providing and improving the Service. We will not use or share your information except as described in this Privacy Policy.

By accessing or using the LeadMe Learning app, you agree to the terms of this Privacy Policy, including the use of Third Party Services, as outlined below. If you do not agree to these terms, please do not access or use this Service.

## Information Collection and Use

Users engage with LeadMe Learning in two different roles – as a Leader (e.g. teacher), or as a Learner (e.g. student). To ensure appropriate use of the app and to maintain data privacy and security, these roles have different data information collection and use requirements. The information that we request will be retained and used as described in this Privacy Policy only.

To use the Service as a Leader you will be required to set up an account. Account setup requires the provision of certain personally identifiable information, including but not limited to a name and email address, and the setting of a password and pin. LeadMe Learning uses Google Cloud Firestore to store and manage account data.

To use the Service as a Learner, no account is required. Learners must enter a nickname of their choice when connecting to a Leader. This nickname is shared only with the Leader, only for the duration of the session, and is not retained when the app is closed.

To allow for the improvement of the Service, we may also collect anonymised data usage statistics from both Leaders and Learners.

To provide the Service, LeadMe Learning uses the following third party services that may collect personally identifiable information:

- [Google Cloud Services](#)
- [Google Play Services](#)
- [Google Analytics for Firebase](#)

## Permissions

To provide the Service, LeadMe Learning requests the following permissions:

- **Location Services** – this is required for Leaders and Learners. Location services are used only to connect Leaders and Learners across the local network, enabling Leaders to send instructions and content to Learners, receive information about Learner actions, and observe Learner's screens. Location data is not used for any other purpose, is not stored, and is not shared in any way.
- **System Overlay/Draw Over Other Apps** – this is only required for Learners. This allows the Leader to block the Learner's screen if they are concerned that the Learner is off-task or accessing unintended third party content. The Leader can unblock the Learner's screen when appropriate. The blocked screen overlay is only functional when a Learner is actively connected to a Leader, and will be automatically removed when disconnected.
- **Screen Capture/Recording** – this is only required for Learners. This allows Leaders to unobtrusively check what a Learner is viewing on their screen.
- **Accessibility Services** – this is only required for Learners. This facilitates 'kiosk mode' by ensuring that Learners remain in the last app requested by the Leader, alerting the Leader to potentially off-task behaviour, and automatically performing Leader-requested actions, such as entering VR mode on a VR video.

## Log Data

If an error occurs during your use of LeadMe Learning we may collect data and information (through third party products) on your phone called Log Data. This Log Data may include information such as your device Internet Protocol ("IP") address, device name, operating system version, the configuration of the app when utilizing our Service, the time and date of your use of the Service, and other statistics. This Log Data is stored on your device, and will only be shared with us following your explicit consent.

## **Cookies**

Cookies are files with a small amount of data that are commonly used as anonymous unique identifiers. These are sent to your browser from the websites that you visit and are stored on your device's internal memory.

This Service does not use "cookies" explicitly. However, the app may use third party services, apps and libraries that use "cookies" to collect information and improve their services. You can choose to accept or refuse these "cookies", however refusal may result in some portions of this Service not functioning correctly.

## **Service Providers**

We may employ third party companies and individuals for the following purposes:

- To facilitate our Service;
- To provide the Service on our behalf;
- To perform Service-related functions; or
- To assist us in analyzing how our Service is used.

To fulfil their duties these third parties may require access to your Personal Information, however, they are obligated to maintain the security and confidentiality of this information in accordance with this agreement.

## **Security**

We value your trust in providing us with your Personal Information and strive to use appropriate technical and administrative safeguards to maintain the integrity and security of your data. However, no method of transmission over the internet or electronic storage is 100% secure and reliable, and thus we cannot guarantee absolute security. If a data breach occurs, we will notify you in accordance with applicable laws and regulations, and take appropriate steps to investigate and remedy the situation.

## **Links to Other Sites**

This Service may contain links to other sites and provide means for a Leader to share links with connected Learners. If you click on a third-party link or have a link shared with you by a Leader, you will be directed to that site. Please note that these external sites are not operated by us. Therefore, we strongly advise you to review the Privacy Policy of these websites prior to use. We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

## **Children's Privacy**

We do not knowingly collect personally identifiable information from children under 18 years of age. In the case we discover that a child under 18 has provided us with personal information, we immediately delete this from our servers. If you are a parent, educator or guardian and you are aware that your child has provided us with personal information, please contact us so that we will be able to take necessary actions.

## **Changes to This Privacy Policy**

We may update our Privacy Policy from time to time. Thus, you are advised to review this page periodically for any changes. We will notify you of any changes by posting the new Privacy Policy on this page.

This policy is effective as of 2021-04-16

## **Contact Us**

If you have any questions or suggestions about our Privacy Policy, do not hesitate to contact us at [dev@lumination.com.au](mailto:dev@lumination.com.au).