

The Network for Learning

Privacy Statement

The Network for Learning (N4L) recognises the importance of protecting your privacy.

This Privacy Statement was last updated on 13th August 2019.

1. Introduction

Overview

- 1.1 This Privacy Statement explains how N4L may collect, hold, use and disclose information that identifies, or is capable of identifying an individual (referred to as personal information).

2. Who does this Privacy Statement apply to?

- 2.1 This Privacy Statement applies to you if you use N4L's internet services at your school (or through arrangements with your school) - for example, it applies to students, teachers, guests, kaitiaki and guardians that use N4L's services (**End Users**). If you are an End User, N4L will only collect your personal information as a custodian, on behalf of your school, for the specific purpose of providing our services to you and your school.
- 2.2 This Privacy Statement also applies to you if you are a representative of a school (such as a principal, teacher or IT technician) (**School Representative**) and you provide any personal information to N4L.

3. Does this Privacy Statement apply to schools?

- 3.1 N4L only collects personal information about End Users on behalf of their school. Accordingly, each school is responsible for ensuring that it complies with the Privacy Act in connection with the collection of personal information about its End Users.
- 3.2 For example, each school that uses N4L's services must ensure that it has obtained authorisation from each End User (or their kaitiaki, parent or guardian) to the collection, use and disclosure of their personal information in accordance with:
- **Part A** of this Privacy Statement – Part A applies to all N4L services; and
 - **Part B** of this Privacy Statement – Part B **only** applies if your school uses N4L's Reporting Services (including email reporting or the Reporting Portal) (the **Reporting Services**).
- 3.3 A school may obtain this authorisation pursuant to its Acceptable Use or ICT Policy. Schools will also collect other personal information, which is unrelated to N4L's services and is not covered by this Privacy Statement.

4. Any questions?

- 4.1 Please read this Privacy Statement carefully. By providing N4L with personal information or using our services, you authorise N4L to collect, use and disclose your personal information in accordance with this Privacy Statement.
- 4.2 If you have any questions about this Privacy Statement, please email us at the details set out in the Contact Us section below.

5. Updates to this Privacy Statement

- 5.1 N4L may update this Privacy Statement at any time by posting an updated version of this Privacy Statement on our website. The updated version of this Privacy Statement will take effect immediately

after it is posted. We may also take additional steps (or ask your school to take additional steps) to make you aware of the changes, including notifying you directly. You are responsible for reviewing this Privacy Statement regularly to ensure that you are aware of any updates.

6. Additional rights and obligations

6.1 This Privacy Statement applies in addition to and does not limit, our rights and obligations under the Privacy Act 1993 (as amended or replaced from time to time) (**Privacy Act**) or any specific authorisation that you provide to us when you interact with us or use our services.

6.2 You don't have to provide us with any personal information that we ask for. However, if you don't, we may not be able to provide you with our services.

PART A: ALL SERVICES

1. Collection of personal information

Types of personal information we collect

1.1 The personal information we collect will vary depending on the services that you use, and your interactions with us. For example, we may collect:

| Network Information (relating to End Users) | Customer Information (relating to School Representatives) |
|---|--|
| <ul style="list-style-type: none">• your network user name, for example, your school ID or email address• information about your device such as its type, browser, IP address, or unwanted programmes on it that communicate over the network such as viruses• information about the applications you use and websites you visit (including websites you have tried to visit but have been blocked by our filtering service for security or safety reasons) | <ul style="list-style-type: none">• your name, job title, address, telephone numbers, e-mail addresses, and school ID• information relating to your relationship with us, for example, the name of your school or organisation• the feedback that you provide (for example, in calls to our helpdesk or when we visit your school) |

1.2 We do not collect any personal information through your use of our website, other than when you actively subscribe to our blog or other publications.

How we collect personal information

1.3 Generally, we collect personal information that is in the 'network information' category through End Users' use of our services, and we collect personal information that is in the 'customer information' category directly from you.

1.4 N4L may also collect information through our website through cookies. Cookies are small pieces of information that are stored on a user's computer. We use cookies to personalise your experience on the website, make it easier for you to navigate our website, and improve your experience by storing your search, posting and application history, and, if applicable, your login details. Cookies can be disabled via your web browser; however, doing so may limit your access to some of our website's content and features. We may use cookies to track non-personally identifiable information such as usage and volume statistics, for research purposes in order to further develop our website.

2. Use of personal information

- 2.1 We will only use your personal information for purposes that relate to providing our services to you and to schools. For example, we may use your personal information:
- for the general operation of N4L and our relationship with schools - including providing schools and End Users with services
 - to manage and improve our services
 - to coordinate joint services with partner organisations
 - to respond to or investigate incidents that could be harmful to users or that breach our terms of use
 - for any other purpose authorised by you or permitted by law (for example to avoid a serious threat).
- 2.2 If you have opted-in to communications from us, we may send you newsletters and other marketing information, including by email and other electronic communications.
- 2.3 If you are a Representative of a school, we may communicate with you, including by email and other electronic communications, about our services.

3. Disclosure of personal information

We hold personal information as a custodian on behalf of your school

- 3.1 If you are an End User, N4L will only collect and hold your personal information as a custodian on behalf of your school. This means that we will only disclose your personal information when we are directed to do so by your school (other than in the limited circumstances set out below). For example, we may provide:
- information (which includes personal information) about use of our services to your school, such as browsing activity
 - your personal information to you or your whānau if you request access to the personal information that we hold about you.

We may need to disclose your personal information to respond to a security threat or legal obligation

- 3.2 The only other circumstances where we may disclose personal information (about End Users and Representatives) are where we:
- need to respond to or investigate a breach of our terms or use or a security incident – for example, we may need to share information with security agencies, Netsafe and CERT NZ; or
 - are permitted or required to disclose information by law – for example, to the Police.

Aggregated information

- 3.3 N4L may also use and share information in an aggregated and anonymous form – we will ensure that this information does **not** identify you or any other individual.
- 3.4 For example, we may share aggregated and anonymous information with:
- the Ministry of Education
 - other government departments or agencies
 - our partners, contractors and service providers (including IT services providers), to assist us with the operations of N4L.

3.5 We may share aggregated and anonymous information for the following purposes:

- Māori data sovereignty – such as sharing information with Māori organisations to help with understanding how data about Māori students can best be used and communicated to tell their stories
- statistical and research purposes – such as public good research projects by providing anonymised data to university or government researchers who are aiming to understand the impacts of digital technology on student learning
- Open and Transparent Government Data – such as summarised information about activity across the whole or a part of the Managed Network, and a summary of activity by decile, region and ethnicity.

4. **Storage of personal information**

Storage

4.1 Personal information that we collect is either held by us (refer to the Contact Us section below) or on our behalf. For example, some information we hold will be stored in “the cloud” in secure databases on our behalf by third parties based overseas. The use of these services and the transfer of information overseas (if applicable) will not relieve us of our obligations under the Privacy Act and this Privacy Statement.

Security

4.2 Security of your information is very important to us. We will take reasonable technical and organisational precautions to protect the personal information that we hold. However, due to the inherent nature of the internet, we can't guarantee the security of any information that you hold or send to us. We keep your information secure by:

- using recommended industry secure storage practices – for example, we keep your personal information behind firewalls
- securing all communications between your browser, your organisation/school, and our environment using mechanisms such as transport layer security
- tracking and tightly controlling access to your personal information
- keeping your identity (email address, username, and other related information) behind firewalls and accessible only to allow us to use or disclose your information as set out in this Privacy Statement.

Updates

4.3 We rely on you to update us if your contact details change (please refer to the Contact Us section below).

5. **Your rights to access your personal information**

5.1 Under the Privacy Act, you have the right to access and request correction of any personal information that we hold about you.

5.2 If you are an End User, please direct your request to your school - this allows us to ensure that appropriate identity verification is undertaken and that, as a custodian of data, we can work with your school to respond to your request.

6. **Other websites**

6.1 Our website may provide links to other websites for your convenience and information. These websites are outside our control and are not covered by this Privacy Statement. If you access other websites

using the links provided, the operators of these sites may collect information from you which will be used by them in accordance with their Privacy Statement. We are not responsible for the privacy policies or the content of any third party website.

7. **Contact us**

7.1 If you have any questions about this Privacy Statement, please contact us at:

The Network for Learning

Phone: 0800 LEARNING (0800 532 764)

E-mail: privacyofficer@n4l.co.nz.

PART B: REPORTING SERVICES

- 1.1. If you are an End User and your school uses the N4L Reporting Services, you authorise us to collect, use and disclose your personal information, as a custodian on behalf of your school, in accordance with this Part B. The use of personal information described in this Part B only applies to N4L Reporting Services and does not apply to any other services provided by N4L.

2. Collection of personal information

- 2.1 If you use our Reporting Services, we may collect the personal information set out in Part A: General Services of this Privacy Statement. More of this data will be collected and it will be retained for longer than set out in Part A: General Services of this Privacy Statement.

3. Use of personal information

- 3.1 If you use our Reporting Services, we may use your personal information for the purposes set out in Part A: General Services of this Privacy Statement. We may also use your personal information to report on the usage of our services by End Users (such as browsing activity) to authorised individuals within your school (e.g. school leadership and IT professionals who aid in the delivery of IT services at your school).

4. Disclosure of personal information

- 4.1 If you use our Reporting Services, we may disclose your personal information to the parties set out in Part A: General Services of this Privacy Statement.