

# Privacy Policy

Byrne Innovations Pty Ltd

Last updated: 09 August 2025

## 1. Introduction

Byrne Innovations Pty Ltd (“Harmony”, “we”, “us”, or “our”) respects your privacy and is committed to protecting your personal information in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs), and the Privacy Act 2020 (NZ).

This Privacy Policy explains how we collect, use, disclose, and protect your personal information when you use our classroom assignment application (“Service”).

By using the Service, you consent to the practices described in this Privacy Policy.

## 2. Who This Policy Applies To

This policy applies to:

- **Organisation users** – authorised representatives of schools or educational organisations who configure and manage spaces (cohorts) and access full student data.
- **Respondent users** – teachers, caregivers, or other authorised individuals who provide information about specific students. Respondents can only access limited information relating to their assigned students.

## 3. Information We Collect

We collect personal information in two main ways:

1. **Information you provide directly** when creating an account, managing a space, or completing a card.
2. **Information provided by your school or organisation** when they set up and manage student records.

### 3.1 From Organisation users

- Name, email address, login credentials
- Organisation details (school name, contact information)
- Payment and billing information (processed via Stripe; we do not store full payment card details)

### 3.2 From Respondent users

- Name, email address, login credentials
- Responses to student rating forms/cards

### 3.3 Student information (provided by Organisations)

- First and last name

- A unique student identifier
- Gender
- Ethnicity (from predefined list)
- Classroom assignment details (current and future)
- Learning support status
- Teacher and caregiver contact details
- Ratings and qualitative input from Respondents
- Additional notes made by Respondents or the Organisation

## 4. Sensitive Information

Some student data collected (e.g., ethnicity, learning support status) is considered “sensitive information” under the Privacy Act. We only collect this information where:

- It is necessary for the functionality of the Service, and
- The Organisation confirms it has the required consent or legal authority to provide it.

## 5. How We Use Your Information

We use personal information to:

- Provide and maintain the Service
- Enable Organisations to configure and manage student groups
- Invite Respondents to complete student information cards
- Generate and present grouping recommendations
- Manage billing and payments via Stripe
- Communicate with users about account, service updates, or policy changes
- Improve and develop the Service, including using anonymised, aggregated data for internal analytics

## 6. Disclosure of Personal Information

We may disclose personal information:

- To the Organisation that invited you to use the Service
- To service providers who assist in operating the Service (e.g., Supabase for hosting, Stripe for billing)
- If required by law or to respond to valid legal requests
- In connection with a merger, acquisition, or sale of assets

We **do not** sell personal information to third parties.

## 7. Storage and Security of Information

- All data is hosted in Australia using Supabase infrastructure. New Zealand users should be aware their data will be stored in Australia, a jurisdiction recognised as having comparable privacy protections.
- We implement reasonable technical and organisational measures to protect your information, including encryption in transit and at rest, access controls, and system monitoring.
- User passwords are stored in hashed form and cannot be retrieved in plain text.

Despite our efforts, no system can be guaranteed 100% secure.

## 8. Data Breach Notification

If we experience a data breach likely to result in serious harm, we will:

1. Notify the Office of the Australian Information Commissioner (OAIC) where affected individuals are in Australia, and/or
2. Notify the New Zealand Privacy Commissioner where affected individuals are in New Zealand, and
3. Notify affected individuals promptly, including details of the breach, the types of information involved, and recommended steps to protect themselves.

## 9. Access and Correction

You may request access to the personal information we hold about you and request corrections if it is inaccurate, out of date, incomplete, or misleading. Requests should be directed to the contact details in section 13.

For student data, requests must be made via the Organisation that provided the information.

## 10. Overseas Disclosure

We do not intentionally disclose personal information overseas. However, some of our service providers (e.g., Stripe) may store or process data in other jurisdictions. We ensure they have appropriate safeguards in place. For New Zealand users, disclosure of data to Australia is expressly permitted under the Privacy Act 2020.

## 11. Children's Information

We do not knowingly collect personal information directly from children. All student data is provided by the Organisation, which is responsible for obtaining parental or guardian consent where required.

## 12. Changes to this Privacy Policy

We may update this policy from time to time. Changes will take effect on the user's next login, where they will be prompted to review and accept the updated policy.

## 13. Contact Us

If you have questions, concerns, or complaints regarding this Privacy Policy or our handling of personal information, please contact:

[harmonysort@gmail.com](mailto:harmonysort@gmail.com)

We will respond within a reasonable time, and if you are not satisfied, you may contact the Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au). If you are in New Zealand, you may instead contact the Office of the Privacy Commissioner (OPC) at [www.privacy.org.nz](http://www.privacy.org.nz).