

BusMinder Privacy Policy

Table of Contents

| | |
|---|-----------|
| <i>BusMinder Privacy Policy</i> | 1 |
| Privacy Policy | 2 |
| Our Customers | 2 |
| Personal Data | 3 |
| Can you remain anonymous | 3 |
| Who we share your personal data with | 4 |
| How we store your personal data | 4 |
| How we secure your personal data | 4 |
| How long we keep your personal data | 5 |
| Social Media | 5 |
| Your Rights | 6 |
| Questions or concerns? | 6 |
| Changes to our Privacy Policy | 6 |
| Website Visitors | 7 |
| Types of personal data we collect | 7 |
| Why we collect and process your personal data | 7 |
| Customers or Prospective Customers | 8 |
| Types of personal data we collect | 9 |
| Why we collect and process your personal data | 10 |
| Why we communicate with you | 10 |
| Bus Drivers | 11 |
| Types of personal data we collect | 12 |
| Why we collect and process your personal data | 13 |
| School Families | 14 |
| Types of personal data we collect | 15 |
| Why we collect and process your personal data | 16 |
| Why we communicate with you | 17 |

Privacy Policy

BusMinder Pty Ltd (ACN 614 066 769) provides bus travel management services that allow schools and parents to view real-time information on the location of students when they travel on the bus.

Privacy is a core value for BusMinder. We understand the sensitivity of the information we collect and are committed to protecting your personal data in accordance with privacy law and community expectations.

This Privacy Policy explains how BusMinder collects and processes your personal data, whether you are a **customer** (i.e. a bus company or school), a **bus driver**, part of a family that uses the BusMinder services, or you are simply reviewing our website.

As an Australian company, we apply privacy principles set out in the Australian *Privacy Act 1988* (Cth), which guide how we collect and manage personal information (we use the term **personal data** throughout our Privacy Policy). Importantly we:

- Give you clear information about our personal data handling practices,
- Only collect personal data that is necessary for our functions,
- Understand the purpose of our services, and restrict our use and disclosure of personal data in that regard, and
- Take reasonable steps to keep the personal data we have secure.

Where BusMinder operates outside of Australia, data protection requirements in those locations may differ. We work to align our personal data handling practices with privacy requirements set out in those locations – including, but not limited to, New Zealand (*Privacy Act 2020*), Japan (*Act on the Protection of Personal Information* (APPI)), the European Union (*General Data Protection Regulation* (GDPR)) and California, USA (*California Consumer Privacy Act* (CCPA)).

Where BusMinder provides bus travel management services on behalf of schools in the US, we engage with schools in accordance with the Family Educational Rights and Privacy Act (FERPA).

Across all BusMinder services, we do not sell personal data.

Our Customers

Our customers include bus companies and schools.

Where we are engaged directly by a school, we collect and process personal data as a data processor (i.e., service provider) on behalf of the school. The school retains the control of, and is responsible for, the personal data.

Where we are engaged by a bus company, we generally collect and process personal data as a sub processor (i.e., subcontractor) on behalf of the school. In this scenario, the school still retains control of, and is responsible for, the personal data that we collect and process.

Schools determine the extent of the personal data provided to BusMinder, and have much control of how the service is operated – for example, the school controls who has access to the BusMinder portal and applications (e.g., teachers, drivers and parents) and what information can be accessed through each application type (i.e. Driver and Parent applications).

Personal Data

The definition of personal data differs depending on where in the world you are. Generally, if data identifies a person, relates to a person who is identifiable or could lead to a person being identified, then the data is personal.

When providing our services we collect personal data. The types of personal data we collect and process depends on our relationship with you. We generally collect and process personal data from the following groups of people:



- **Website visitors** – We collect some personal data when people visit our website.
- **Customers and prospective customers** – Our customers are organisations, i.e., bus companies or schools. The personal data we collect generally only includes details of the customer’s nominated contact person(s).
- **Bus drivers** – We collect some personal data from people who drive buses, where the person has either (1) downloaded the [BusMinder Driver](#) application and logged in as a bus driver, or (2) where the person has logged into a BusMinder device installed on the bus.
- **School families** – We collect personal data from parents and students who use the BusMinder application and services. School families use the [BusMinder Parent](#) application.

To find out more about the types of personal data we collect, why and when we collect personal data, and other information about our personal data handling practices that is relevant to you specifically, see below:

Can you remain anonymous

The nature of our bus travel management services means that we are not able to provide our services to you anonymously. If you do not wish to share your personal data with us, we may be limited in the services that we can provide you.

Who we share your personal data with

BusMinder uses external parties to provide services on our behalf. To provide these services, we may share elements of personal data with service providers that relate to the services being provided. We ensure that contracted services providers only process personal data for the purpose it was provided to them, and not for any other purpose. A listing of service providers that handle personal data on behalf of BusMinder, is available in our [Service Provider Information](#)

We do not sell or share personal data with any advertisers, sponsors, content providers, media outlets, law enforcement or other person or entity, unless:

- We have asked you and you have expressly agreed, or
- There is a lawful ability or requirement for us to do so (e.g., a court order).

Where we store your personal data

All data is stored in **Australia**, we use a cloud storage provider, Amazon Web Services, to store data, including personal data. A back-up of the data is also stored by Google Cloud Storage. The data is stored, and backed up, on servers located in Sydney, Australia. We will never disclose or store your personal data outside of Australia.

For services outside of Australia, your data will be stored within your Country unless otherwise advised in your Terms and Conditions.

How we secure your personal data

At BusMinder, we securely manage and dispose of personal data. We have a range of data security practices whether personal data is stored onsite or in the cloud. Our security practices include:

- Regular backup of data, including personal data
- Encryption of personal data when it is stored and/or transferred
- Use of anti-virus on all IT systems
- Regular information security reviews
- Identification and remediation of any security risks or vulnerabilities in our IT systems
- Restricted access by BusMinder staff to data systems that contain personal data

Protection of personal data from unauthorized access and disclosure is a priority for us. Any concerns about the security of personal data held by BusMinder should be reported to us without delay, by email: support@busminder.com.au.

How long we keep your personal data

All personal, school, and location data will be kept for the required 5 year period. Where we no longer require personal data for the purpose it was collected, we will securely destroy that data.

If you would like your personal data to be completely removed from BusMinder systems, you can request us to delete your data at any time. This will be like we have never known you. Deletion may, however, not occur instantly, as we will require time to delete your data from our backups and from any of our service provider locations. If you would like us to delete personal data we hold about you, please write to us at support@busminder.com.au.

Social Media

BusMinder maintains a number of social media accounts, including [Facebook](#), [LinkedIn](#), and [Twitter](#), for the purpose of advertising our services, and pushing out information about our applications and services.

Social media platforms generally apply their own privacy policies to any personal data that is captured or shared while on their sites. As such, some people may prefer to deal with us directly [here](#), as opposed to making comments or asking questions via social media channels.

Your Rights

You have rights in relation to your personal data held by BusMinder. These are called your ‘[data subject rights](#)’ and include:

| | |
|-------------------------------------|---|
| Right to access | The right to access your personal data held by BusMinder, and to receive other information about that data. |
| Right to correct | The right to correct your personal data where you think it is incorrect or out of date. |
| Right to erasure | The right to require BusMinder to delete all personal data we hold about you. |
| Right to object | The right to object at any time to certain types of processing of your personal data. |
| Right to data portability | The right to receive the personal data BusMinder holds about you in an accessible format. |
| Right to restrict processing | In certain circumstances, you have the right to obtain a restriction on the processing of your personal data. |

Exercising your data subject rights

If we hold personal data about you, we are happy to tell you what it is, update it, delete it, or stop using it. We will not, however, tell someone else what personal data we hold about you (unless you give us permission or we are legally required or authorised to do so).

Depending on our relationship with you, there are certain circumstances where BusMinder collects and processes personal data on behalf of our customers. This occurs, for example, where we collect parent and student information on behalf of a school. If you submit a data subject rights request with us, where the personal data is held and controlled by another organisation (e.g. a school), we will direct you to the appropriate organisation.

For those people who hold an account with us (including schools, bus drivers and parents), you are able to access and update certain personal data via your BusMinder App.

If you would like to exercise any other rights set out above, please contact make your [data subject rights request](#) via email at: support@busminder.com.au.

Questions or concerns?

If you have any questions about this Privacy Policy or are concerned about how we handle personal data, please contact us via the details set out below. Please include your name and contact details, and clearly describe your question or concern, including as much detail as possible. We will aim to provide you with a prompt response.

Email: support@busminder.com.au

Address: Data Protection Officer
1 Isabella St, Malvern, Vic 3144 Australia

If you have made a privacy complaint and are not happy with how we have responded to your concern, you are able to contact the Office of the Australian Information Commissioner (OAIC). The OAIC's process is available [here](#).

Changes to our Privacy Policy

We may decide to update this Privacy Policy to ensure that our personal data handling practices are correctly reflected. We will let you know if we make changes to this policy, by providing a notice when you next access the BusMinder application, or by contacting you using contact details that have been provided to us.

This policy was last reviewed on 29 July 2022.

Website Visitors

Types of personal data we collect

We collect limited personal data when a person visits our websites, which may include the following:

Enquiries data

When you contact us or use our 'Contact Us' form, we collect and use your personal data to communicate with you and answer your questions. Enquiries data we collect and process includes name, email or your preferred contact method, and the nature of the enquiry or correspondence with us.

Data subjects request data, or privacy complaints

When you submit a data subject rights request, or submit a privacy complaint, we use this data to process your request or investigate your concern, and to communicate with you. We collect and use your name, contact information and details regarding your request or concern.

Why we collect and process your personal data

We collect and process personal data for a number of purposes, when you visit the website, which have been described below. Our legal bases for doing this are also set out in the table below.

| Legal Basis | We collect and use... | Purpose |
|---|---|---|
| Legitimate interest BusMinder does this in our interest, to support and promote the use of our services | Enquiries data | To ensure the proper functioning of our website, and our web based and mobile platforms |
| Consent We ask a person to agree to this. You can withdraw this consent at any time. | Analytics data | To analyse the usage of our website, to improve your website experience |
| | Enquiries data | To answer your questions about our services |
| | Data subject rights request/ privacy complaint data | To process your request or investigate your concern, and communicate with you |

Customers or Prospective Customers

Types of personal data we collect

Our customers are organisations, including bus companies and schools. The personal data we collect generally only includes details of the nominated contact person(s) for our customers or prospective customers.

The types of personal data we collect from our customers includes:

Enquiries data

If you are a customer's contact person, we collect and process minimal personal data when you ask about our services, including when you use our 'Contact Us' form online. Enquiries data we collect and process may include the name of a customer's contact person, as well as the customers' preferred phone, email and address details, and the nature of the enquiry or correspondence with us.

Customer contact information

We collect and process personal data to get in touch with our customer's contact person(s) in relation to the provision of our applications and services. We generally collect this information when a school or bus company engages us to provide our services, or when this information is added by the school to the BusMinder portal.

Our collection of personal data in this context is usually limited to details of the nominated contact person(s), such as the contact person's name, as well as the business or school email, phone and address.

Teacher login information

Where the school provides it, BusMinder collects and processes information about teachers for the purposes of creating login details to the BusMinder portal. BusMinder may collect the teacher's name, phone number, email address, password, tag number and teacher type (such as admin, or whether the teacher supervises active or charter bus runs).

Customer payment data

We collect and process payment information to provide our services. When customers provide payment information to us, they will usually provide the payment information of their organisation, as opposed to an individual.

There may be limited circumstances, however, where personal payment information is provided to and processed by us (such as name on card, card type, amount purchased). We do not knowingly receive payment information of a person, rather, we ask our customers to use their approved corporate payment facilities.

Data subjects request data, or privacy complaints

When you submit a data subject rights request, or submit a privacy complaint, we use this data to process your request or investigate your concern, and to communicate with you. We collect and use your name, contact information and details regarding your request or concern.

Why we collect and process your personal data

We collect and process personal data for a number of purposes, which have been described below. Our legal bases for doing this are set out in the table below.

| Legal Basis | We collect and use... | Purpose |
|---|---|---|
| Legitimate interest BusMinder does this in our interest, to support and promote the use of our services | Customer contact data | To send our customers promotional emails. Whilst these emails may be sent to a customer's contact person, they are intended for our customers, i.e. organisations, as opposed to contacting a particular individual |
| Consent We ask a person to agree to this. You can withdraw this consent at any time. | Enquiries data, Customer contact data | To answer your questions about our services |
| | Data subject rights request, Privacy complaint data | To process your request or investigate your concern, and communicate with you |
| Contract We will do this as part of our contract with you, as per our Agreement with you | Customer contact data | To enter into a contract with you To communicate with you or provide you support as part of our services To answer your queries, concerns or complaints |
| | Teacher login information | To create logins for teachers to access the BusMinder portal or Supervisor app |
| | Customer payment data | To accept payment for your purchase of our goods and services |

Why we communicate with you

We may communicate with our customers on a number of occasions. This correspondence is intended for the bus company or the school, as opposed to being directed at any individual. Our communication with customers may relate to:

- Responding to your enquiries about our services,
- As part of our services, including in relation to:
 - Available updates, including software updates
 - Account and payment information
 -
- Providing support in your use of our services, and
- Sending you promotional communication about BusMinder and our services.

If a customer's contact person does not wish to receive promotional communication on behalf of the customer, they can request us to stop contacting them, by emailing us at support@busminder.com.au.

Bus Drivers

Types of personal data we collect

We collect and process limited personal data from people who drive buses, where the buses use our bus travel management services (i.e. where the driver has installed the BusMinder Driver application or where the bus has a BusMinder unit installed).

The types of personal data we collect from you (as a bus driver) includes:

Bus driver account data

Our schools provide us with information about people who drive buses, in order to register a BusMinder Driver account for them. This account allows a driver to log in at the start of the bus run, using either the BusMinder Driver application, or the BusMinder unit installed on the bus.

BusMinder collects and processes personal data of bus drivers, to set up their BusMinder account. This includes name, phone number, email address and password. The school may also choose to share the driver's mobile number, pin number, tag number.

Bus driver location data

When a bus driver logs into their BusMinder account and begins their bus run, the BusMinder application or unit collects and processes location data of the device, and accordingly the location of the bus. This allows the BusMinder service to provide parents and schools with the precise real-time location of buses.

This location data is collected anonymously in a form that does not personally identify the driver, and is used by BusMinder and our service providers to provide and improve location-based services. We only disclose location data to the relevant school and parents.

Location based services may be switched off through the BusMinder application or the BusMinder unit device settings, however this may limit the service that is provided to our Customer, i.e. the school or bus company.

Bus driver contact data

Where a bus driver requests support from BusMinder, BusMinder will collect and process personal data of the driver in order to provide support as part of our services, under our contract with our customer. We collect and use your name, contact information and support requirement details.

Data subjects request data, or privacy complaints

When you submit a data subject rights request, or submit a privacy complaint, we use this data to process your request or investigate your concern, and to communicate with you. We collect and use your name, contact information and details regarding your request or concern.

Why we collect and process your personal data

We collect and process personal data for a number of purposes, which have been described below. Our legal bases for doing this are set out in the table below.

| Legal Basis | We collect and use... | Purpose |
|---|---|---|
| Legitimate interest BusMinder does this in our interest, to support and promote the use of our services | Analytics data – Essential data only | To ensure the proper functioning of our applications and ... |
| Consent We ask a person to agree to this. You can withdraw this consent at any time. | BusMinder requests location access permissions on the physical device | To provide real time visibility of the vehicles to our customers schools/ bus companies |
| | Data subject rights request, Privacy complaint data | To process your request or investigate your concern, and communicate with you |
| Contract We will do this as part of our contract with our customer, i.e. bus company or school who we provide services on behalf of | Analytics data | To ensure the proper functioning of our application and [insert] used by you when accessing our services under contract |
| | Bus driver account data | To set up a BusMinder Driver account |
| | Bus driver contact data | To communicate with you where you request support as part of our services |
| | Bus driver location data | To provide our bus travel management services, as part of our services |

School Families

Types of personal data we collect

BusMinder collects and processes personal data of students and parents, where the student's school uses our bus travel management services. The data may be collected from parents directly, or collected from the student's school.

The personal data we collect and process about you (as a member of a school family), in providing our services, is set out below.

Analytics data

No Analytical data is collected from the Parent app.

Enquiries data

When you contact us or use our 'Contact Us' form, we collect and use your personal data to communicate with you and answer your questions. Enquiries data we collect and process includes name, email or your preferred contact method, and the nature of the enquiry or correspondence with us.

Student data

Schools provide us with details of students, in order to provide our bus travel management services to the school and school families.

Whilst BusMinder requires limited student data, the amount of data provided to BusMinder, is determined by the school. The functionality of the service, however, is improved where sufficient information is provided.

Student information collected and processed by BusMinder includes the **student ID/ number** and the **student tag number** (see below for more information). The school may also provide BusMinder with the following information:

- Pin number (in case of a forgotten card)
- Full name, or first name and/ or last name
- Student image
- Preferred name
- Bus pass (the type of bus pass the student holds)
- Student address
- Medical details (such as whether the student requires wheelchair access)
- Student campus
- Student year level
- Whether the student is a bus traveller
- Student behaviour
- Trip information, including the trip and bus stop information
- Any other information the school chooses to share

In accordance with our Terms and Conditions, our bus company and school customers must commit to fair and lawful personal data handling practices, which may include notifying you, and requiring your consent, prior to sharing your personal data with us.

The school may choose to allow bus drivers to access student information (including emergency contact information and bus stop information) once a student has entered and ‘tapped on’ the bus.

Student tag number

Schools provide us with a ‘tag number’ for each student. The tag number is included on the student’s BusMinder card, or on an issued NFC sticker that is usually stuck to the school student ID card. A student will tap their card onto an electronic reader, when entering and exiting the bus.

When a student taps on or off, the student tag number is converted to the student ID/ number and other student information provided by the school.

Student location data

BusMinder tracks the location of the BusMinder bus driver application or unit device, where the driver has logged into their Driver account, and selected the bus run.

When a student ‘taps on’ the bus, BusMinder will record that they have boarded. Similarly, where a student ‘taps off’ the bus, BusMinder will record that they have exited the bus. As BusMinder is tracking the location of the bus (i.e., the driver device that is located on the bus), BusMinder can therefore record the location of a student where the student has used their BusMinder or ID card to tap onto the bus.

BusMinder collects and processes the location of students (i.e. that are on the bus), to notify parents and the student’s school of the following:

- When and where the student has boarded the bus,
- The real time location of students during their bus commute, and
- When and where the student exited the bus.

The location of buses (and accordingly students recorded as ‘tapped onto’ the bus) is only disclosed to the student’s school and the student’s parents and Bus Company via the BusMinder portal and application.

It is important to note, that BusMinder does not track the location of students specifically, in that we do not collect location data from the student’s BusMinder card or student ID card. BusMinder only collects location data from the bus or driver device.

Parent account data

Schools provide us with details of parents and/ or students, in order to establish a BusMinder Parent account with us, including your login for the app. The app allows you to undertake a number of functions relating to you or your child’s bus travel, including tracking the bus trip of your children in real time.

BusMinder may collect and process the following data from parents and students to set up their account:

- Student ID
- Parent/ student name
- Email
- Password
- Phone number
- Whether the parent is an emergency contact

Parent contact data

BusMinder may on occasion, collect and process personal data of parents for the purposes of contacting you as part of our services, for example, to notify you of updates to this privacy policy, or in relation to booking requests or payments made with us. We collect and process your name, email and our correspondence with you.

Parent location data

If location permissions are set to ON in the Parent app, parents will be able to view their location on MAP and this provides a reference point to how far away they are from the route/bus. BusMinder does not collect or store this information.

Booking request and absentee data

BusMinder collects and processes data for the purposes of booking bus travel and processing absentee requests. This information may be collected from the student's school, or the parents directly via the BusMinder application. Personal data collected in regards to booking requests includes:

- Bus stop address (i.e. the address of student pickup and drop off)
- Date and time of pickup/ drop off
- When a student is absent
- Duration of the absence

Payment data

BusMinder processes payment data of parents via the BusMinder Parent app. Payment data is transmitted to a 3rd party payment Gateway called Braintree. They process the payment and give us back a receipt number. We do have access to Braintree portal where we can see payments that were made, however we do not store credit card data. Information collected and processed includes cardholder name, card details, payment amount, payment date. We use this information to process payments for bus travel bookings.

Data subjects request data, or privacy complaints

When you submit a data subject rights request, or submit a privacy complaint, we use this data to process your request or investigate your concern, and to communicate with you. We collect and use your name, contact information and details regarding your request or concern.

Why we collect and process your personal data

We collect and process personal data for a number of purposes, which have been described below. Our legal bases for doing this are set out in the table below.

| Legal Basis | We collect and use... | Purpose |
|---|---|--|
| Consent We ask a person to agree to this. You can withdraw this consent at any time. | Enquiries data | To answer your questions about our services |
| | Data subject rights request, Privacy complaint data | To process your request or investigate your concern, and communicate with you |
| Contract We will do this as part of our contract with our customer, i.e. bus company or school who we provide services on behalf of | Student data | To provide our bus travel management services to parents and schools |
| | Student tag number | To record student's tapping on (entering) and tapping off (exiting) the bus |
| | Student location data | To record and notify parents and schools of the precise real time location of buses, and accordingly students recorded as 'tapping on to the buses |
| | Parent account data | To set up a BusMinder Parent account |
| | Parent contact data | To communicate with you about our services, e.g. in relation to bus travel bookings or payments |
| | Booking request and absentee data | To book bus travel for students, and record a student absent |
| | Payment data | To process payment for student bus travel |

Why we communicate with you

BusMinder will only ever communicate with you (i.e. parents and school families) as part of providing our services. The communication may, for example, notify you of updates to this Privacy Policy, notify you of software updates or be in relation to booking requests, absentee requests, or payments made.

We will never communicate with you for the purpose of promoting our services.

Your school may, however, send you communications or alerts through the BusMinder application in relation to your student's bus travel. For example, the alerts may be in relation to your student boarding the wrong bus or exiting at the wrong stop.