This privacy policy governs the mobile school apps developed by Honeygarlic Software Ltd. ("Honeygarlic"). These apps are used by students, parents and school staff to manage schedules, store notes, and as a communication tool to inform students and parents.

1.   **Student Provided Information**

Information entered into the app by the user (including student name, classes, timetable, photos, notes and assignments) are stored on the device only and not on any supporting app servers. The only exception is that each copy of the app registers a unique but anonymous identifier with the push notification service, along with a list of the subscribed channels associated with that user. This identifier does not identify the device serial number, phone number or provide any other identifying information.

2.   **School Provided Information**

Information provided by the school staff may be stored on the supporting app servers. This information includes but is not limited to:

- school contact, calendar and event information matching that available publicly on the school website;
- a record of push notifications sent out to the app;
- a record of news bulletins sent out to the app; and
- login information (email address) and a list of permitted functions an authorized school staff member has access to.

This information is provided by the school at their discretion.

3.   **App Servers**

As of December 2016, the app servers are hosted at an SSAE16 SOC-1/SOC-2 compliant facility located in Toronto, ON. All connections to the server are encrypted. School staff logins to the web console are password protected and user access levels are enforced to limit access as authorized. Administrative access to the app servers requires passwords and/or ssh keys available only to Honeygarlic staff. All computers operated by Honeygarlic with administrative access to the app servers use whole-system encryption, and encrypt all backups.

4.   **Availability of School Provided Information**

The mobile app does not require any form of registration or authorization to download and use, with the exception of subscribing to notification channels marked as private which require either a per-channel or per-user access code (at the discretion of the school) to access. Accordingly, all information provided by the school, including contact, calendar, and event information, as well as news bulletins and sent push notifications, should be considered publicly available.

5. Automatically Collected Information

In addition to the unique but anonymous identifier required for push notifications, the only information automatically collected by the mobile app is the device type (i.e. iPhone 5, 6, etc) and operating system version. This information is collected in a completely anonymous fashion and is not tied to any information which could identify the user or the device, and is used solely for determining support for future features and versions of the app.

The app does not collect any other information about the device or user, including other installed apps, app or device settings or status, phone number, or the location of the device.

6. Third Party Access to Information

- As noted above, anonymous push registration information is available to the service provider.
- Push notifications sent to the app are transmitted through the push service provider.
- Backups and snapshots of the supporting app server (containing the publicly available School Provided Information) are available to the hosting provider in order for them to provide required services and support, access being governed by their privacy policies.
- An individual app user may have an online backup service (such as iCloud backup) enabled for their device at their discretion, which may cause their personally entered information to be stored somewhere other than their device. This is beyond the control of Honeygarlic, and is governed by the privacy policies of the backup service being used.

The school may at their discretion enable access to third party services such as Google Classroom from within the app. These third party services may include student information stored according to their policies, which are beyond the control of Honeygarlic. The apps will present a corresponding warning prior to allowing the student to access the third party service, and will clearly indicate functionality provided by the service. No student provided information in the app will be made available to the third party service without an additional warning and explicit permission of the user.

7. Device Security

It is the user's responsibility to ensure the security of their device and any information stored thereon in the event the device is lost or stolen. This is typically addressed through the use of passcodes, device encryption, fingerprint scans, or other methods as available by the device manufacturer or operating system provider. As these measures, their manner of use, and the physical security of a device, are all outside the control of Honeygarlic, no responsibility for the security thereof is assumed or implied.

8. Disclosure

Student Provided Information is not available in any fashion to Honeygarlic and therefore cannot be disclosed by us. We may disclose School Provided and Automatically Collected Information:

- as required by law, such as to comply with a subpoena, court order or other legal process;
- when we believe in good faith that disclosure is necessary to protect our rights, protect user safety or the safety of others, investigate fraud, or respond to a government request; or

- to trusted service providers who work on our behalf and have agreed to adhere to the rules set forth in this privacy policy.

If Honeygarlic is involved in a merger, acquisition, or sale of all or a portion of its assets, all customer schools will be notified via email and/or notice posted to our website. No information under our control will be transferred as part of any such merger, acquisition, or sale without authorization.

9.   Data Retention Policy

We will retain School Provided Information (including calendar information, sent bulletins and push notifications) for as long as you use the app and for a reasonable time thereafter. We will retain Automatically Collected information for up to 24 months and thereafter may store it in aggregate. If you'd like us to delete School Provided Information, please contact us at privacy@honeygarlic.ca. Please note that some or all of the School Provided Information may be required in order for the app to function properly or may need to be retained to meet legal requirements.

10. General Security

We are concerned about safeguarding the confidentiality of your information. We provide physical, electronic, and procedural safeguards to protect information we process and maintain. For example, we limit access to this information to authorized employees and contractors who need to know that information in order to operate, develop or improve our app. Every reasonable effort will be made to secure information we process and maintain, however due to the rapid and constant evolution of the security landscape, perfect security is not guaranteed.

11. Changes

This privacy policy may be updated from time to time for any reason. We will notify you of any such changes by posting them on the website and by emailing anyone who requests to be updated by this method. You are advised to consult this privacy policy regularly for any changes, as continued use of the app is deemed approval of all such changes.

12. Consent

By using the app and supporting servers/services, you are consenting to our processing of your information as set forth in this privacy policy, now and as hereafter amended by us. "Processing" means using or touching information in any way, including, but not limited to, collecting, storing, transmitting, deleting, using, combining and disclosing information.

13. Contact us

If you have any questions regarding our privacy policy or practices, please contact us via email at privacy@honeygarlic.ca.