Chatloop Privacy Policy

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1.   About this policy

Chatloop is a language-learning platform designed to support people seeking asylum, refugees and people from refugee backgrounds who are adapting to new cultures and environments. Chatloop allows them to interact daily with native English speakers via text messages sent from an application on their mobile devices.

When you open and use an account on Chatloop, you will give us information about you that is personal. At times, we will need to handle some of your Personal Information. However, we are committed to protecting your privacy when we do so. We have prepared this Privacy Policy to describe to you our practices for handling Personal Information and other information we collect from Users of our website located at https://chatloop.org ("Website") and the Platform. Capitalised terms not defined in this Privacy Policy are to be understood in accordance to the definitions given in our Terms of Use.

This policy reflects Chatloop's information handling practices as at the date of this version. If you have any questions about this Privacy Policy, please contact privacy@chatloop.org.

2.   Overview

We handle personal information in accordance with the *Privacy Act 1988* (Cth). Personal Information is collected and held by us when you register to use the Chatloop Platform ("Platform"). We collect, hold, use and disclose Personal Information, Anonymous Data and other information by:

- maintaining personal profiles on the Chatloop Platform;
- maintaining user data;
- managing and improving the Chatloop User Interface;
- assessing the social impact of the Chatloop Application;
- training Partners and Tutors;
- carrying out and supporting research; and
- engaging financial supporters and stakeholders.

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In particular, Users that take part in the same Chatloop Activity (a chat group involving two or more Users) can access and view the Personal Biographical Information that is in each other's profile during the period that they are participating in an activity together. This means that the Personal Biographical Information that is in your profile can be viewed by other Users of the Platform who are participating in a Chatloop Activity with you.

3. Types of information and data we collect

"Personal Information" means information that allows someone to identify or contact you, including your name, email address and other related information that is not generally available to the public. Personal Information includes "Sensitive Information". More information on why and how we use and disclose Personal Information is set out at Part 7 below.

Information collected by technology

When you visit the Website or use the Platform, information that is not Personal Information is collected from your activity on the Website or Platform. More information on when this information is collected is set out at Part 5 below.

Details of the different types of information and data we collect, how and why we collect it and to whom we disclose it is available here.

5.   Collection of personal information

When registering to use the Platform, you will be asked to provide information that is personal. The information that you provide to us is listed in Table 1. Information that is disclosed to other Users is indicated in Table 2. Note that when you register to use the Platform you are asked to provide a 'display' name. You may choose to give your real name or to use an alias.

Table 1   Table 2

Personal Information collected from Users	Personal information visible to other Users
First name (if you choose to use your real name)	First name (if you choose to use your real name)
Email address	-
Gender	Gender
Nationality	Nationality
Country you are living in	Country you are living in
You may also provide:	
Age	Age*
Town/city you live in	Town/city you live in*
Personal photo	Personal photo*
Sensitive Information collected from Users	**Sensitive information visible to other Users**
Your first language	Your first language

* Can be viewed only if User chooses to make available on their User Profile

6.   When do we collect Personal Information?

When you create a Chatloop account, you give permission for the information indicated in Table 2 to be displayed on your User Profile. This means that it can be

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accessed and viewed by Platform Users and Chatloop staff. We refer to the information that is listed in Table 2 as your "Personal Biographical Information".

You may disclose Personal Information or Sensitive Information during the course of a Chatloop Activity or conversation ("Chatloop Conversation") with another User, other Users, Partner or a Tutor. Records of Chatloop Conversations that occur via the Platform are kept and stored electronically on our server (which may be hosted by a third-party service provider). Information that you transmit to others on the Chatloop Platform can be accessed and viewed by Tutors and Partners. Records of a Chatloop Conversation may be deidentified, anonymised and used for research or promotional purposes. Details of how we use this information is available here.

You are not required to give to other Users any other information that is personal or sensitive. Furthermore, during a Chatloop Conversation, you must not disclose any information that will allow the recipient to precisely identify you or make personal contact with you. As such, disclosing personal information such as your address, phone number, social media accounts and precise details about where you work and other information that allows you to be identified by other Users is not allowed and may result in termination of your Chatloop account.

If you choose to disclose information (whether personal, sensitive or otherwise) to another User on the Platform, that information can be viewed by the User as well as the Tutor and Partner that are taking part in the Chatloop Activity with you. If the Chatloop Activity that you are participating in is a group conversation, any information that you disclose via the Chatloop Platform is visible to all Users, Tutors and Partners that are participating in the Chatloop Activity with you. Information disclosed via the Chatloop Platform is visible to others for the duration of the Chatloop Activity.

7. Information that is collected when using Chatloop

To make the Platform and the Website more user-friendly, our servers (which may be hosted by a third-party service provider) collect information from you, including your device type, browser type, operating system, Internet Protocol (IP) address (the number automatically assigned to your device when you use the Internet, which may vary from session to session), domain name and/or a date/time stamp of your visit ("Metadata"), and information about your activity on the Platform. This information is not matched to your Chatloop account.

We collect information from Users on their usage history on the Platform. Information collected about how Users use the Platform does not include personal information. Metadata is aggregated and used by us to improve the Chatloop Platform and evaluate

such things as the average number of Chatloop Conversations that occur, the average amount of time Users' take to complete Chatloop Activities and the average time spent on the Chatloop Platform.

8. How do we use your personal information?

General use of Personal Information

We collect Personal Information when you create your Chatloop profile, so that we can communicate with you and so that other Platform Users have some background information about the person they are communicating with. We use your Personal Information in the following ways:

- to enable the creation of and secure your Chatloop account on our servers;
- to identify you as a User in our system;
- to enable other Users to identify you as a User on the Platform;
- to improve the Platform and Website;
- to send you an email verifying the email address you provide to us when creating your Chatloop account or to reset your password;
- to send you administrative email notifications, such as updates or maintenance advisories about the Platform, Chatloop Application or Website;
- to respond to questions submitted by you;
- to send you email communications, electronic newsletters and other materials relating to Chatloop and invitations to participate in research relating to Chatloop Activities and/or your use of the Platform.

We also share your Personal Biographical Information with other Users to make Users' experience on the Platform more personal.

Creation of Anonymous Data

"Anonymous Data" means information that has been de-identified or aggregated and which therefore cannot be linked to your Personal profile. We create Anonymous Data records from Personal Information and Chatloop Usage History by excluding information (such as your name) that make the data personally identifiable to you.

Chatloop uses the Personal Information that it collects on the Platform, the Chatloop Application and the Website, which may also include de-identified Anonymous Data obtained from records of Chatloop Activities, to carry out assessments and research on the Platform's impact on language learning and cultural adaptation.

Where we use or disclose Anonymous Data, we will remove any personal information which could be used to identify you.

Further details of the different types of information and data collected, how and why we collect it and to whom we disclose it is available [here](#).

9. Storage

The Personal Information that we collect is stored on a database that is maintained by a third party. Information held on the database is encrypted so that your data remains secure.

10. Accessing and correcting your personal information

You can request access to personal information we hold about you, or for corrections to be made to that information at any time. If we receive such a request, we must respond within 30 days, and give you access to the information wherever practicable. Upon receiving a request for your information to be corrected, we must take reasonable steps to correct the information, if we consider that information incorrect.

You can send any request to access your information or any request to have that information corrected to privacy@chatloop.org.

11. Changes to this Privacy Policy

This Privacy Policy may be updated or changed from time to time. If we make any material changes in the way we use your Personal Information, we will notify you by sending you an email to the latest email address you provided to us and/or by posting a clear and prominent notice of the changes on our website.

12. Complaints

If you would like to make a complaint about how we have handled your information, you can do so by email to privacy@chatloop.org. We will review the details of your complaint and respond as soon as possible. We aim to respond to all complaints within 14 days. We will handle your complaint fairly and take action that is necessary to resolve your concerns, if appropriate.

If you are not satisfied with how we have handled your complaint, you can make a complaint to the Office of the Australian Information Commissioner:

https://www.oaic.gov.au/privacy/privacy-complaints/lodge-a-privacy-complaint-with-us/

13. Key terms

"Academic Researcher"

means a person or people, whether individually or collectively, who are named as the researchers responsible for undertaking an Approved Research Project. A person that undertakes research which is primarily for the purpose of producing information that is, or intended, to be applied for a political purpose or undertaken in connection with a political party in any jurisdiction is not considered an Academic Researcher.

"Approved Research Project"

means research of an academic nature carried out on behalf of a reputable academic institution or research that has been authorised by such an institution and which complies with applicable ethical standards and/or guidelines. A project that is designed for the purpose of producing information that is to be used for a political purpose, or in connection with a political party in any jurisdiction, is not considered an "Approved Research Project". Where an Academic Researcher seeks or requires consent for Users to participate in an Approved Research Project, requests for consent will be directed to Users via the Chatloop Platform.

"Anonymous Data"

means information that has been subject to a process of de-identification to remove identifiers of personal information and which is not linked to a User's Personal Information.

"Application Programming Interface" or "API"

means a set of rules, protocols and configuration settings and tools that enable software programs and electronic hardware devices to operate or interface with the Chatloop Platform. The API used by Chatloop is a third-party API.

"Chatloop Administrative Console"

is a part of the Chatloop website that is accessed by Chatloop staff to perform certain tasks that are necessary for management and administration of the Chatloop website. This includes, but is not limited to, managing and viewing information in user accounts, creating and deleting accounts and obtaining aggregate data about visits to and use of the Chatloop website.

"Chatloop Activity"

includes communications and other activities carried out by Users via the Chatloop Platform.

"Chatloop Application"

means the specialised software program formulated for use of the Chatloop Platform and that is downloaded onto an electronic hardware device to enable Users to access and use the Chatloop Platform. Use of the Chatloop Application is subject to Chatloop's Terms of Use.

"Chatloop Conversations"

are the records of written communications between Users when they are doing a Chatloop Activity.

"Chatloop Public Website Traffic"

means a single record or collection of data records that contain information about how many people are visiting the Chatloop website, how visitors find and access the website and the browser or device types used by visitors to the website.

"Chatloop Usage History"

means a single record or collection of data records that is generated in connection with a User's use of the Chatloop Platform and includes, but is not limited to, data about: how often a User uses the Chatloop Platform; how many Chatloop Conversations a User participates in; the amount of time a User spends on the Chatloop Platform; how long Users take to complete Chatloop Activities and the number of activities completed by a User.

"Learner"

means any User who has identified themselves as a person who is using Chatloop to learn a language and has nominated to be registered on the Chatloop Platform as a User who will participate in Chatloop Activities to learn a language.

"Partner"

means a User who is registered on the Chatloop Platform as a person who will participate in Chatloop Activities for the purpose of assisting a Learner to learn a language.

"Platform"

means the electronic system that includes the Chatloop Application and User Interface that Users access and operate during a Chatloop Activity and includes the Application Programming Interface.

"Personal Biographical Information"

includes the following information about a User: first name, gender, nationality, first language, country of residence and, where provided by the User, their age, city of residence and profile picture.

"Sensitive Information"

means information about a person's racial or ethnic origins; political, religious or philosophical beliefs or affiliations; membership to a professional, trade or union association; sexual preferences or practices; or criminal records.

"Tutor"

means any User who is registered on the Chatloop Platform as a person that will Participate in Chatloop Activities for the purpose of providing feedback to Learners and Partners on Chatloop Activities.

"User"

means a person, other than Chatloop staff, who registers to use the Chatloop Platform and includes a person that is a Partner or Tutor.

"User Interface"

means the process, functional commands and look and feel by which Users operate the Chatloop Application and other features provided by the Chatloop Platform, and includes any and all visual elements and/or appearance of the Chatloop Application or Chatloop Platform that are designed to be seen by the User.

"User Profile"

means the part or parts of the User Interface that displays the information that is listed in Table 2 of this Privacy Policy and can be accessed and viewed by Platform Users and Chatloop staff.

14. Contact us

If you have any questions, you can contact us at privacy@chatloop.org.