OES EZ/Extend Privacy Policy

Last updated 11 November 2024

This Privacy Policy describes how Online Education Services collects, uses, stores and processes personal information and other information through its EZ/Extend product.

This Privacy Policy includes the following:

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About OES

Online Education Services has offices in Australia (Online Education Services Pty Limited ABN 75 148 177 959 (**OES Australia**)) and the United Kingdom (Online Education Services Limited company number 10942893 (**OES UK**)). Our websites https://oes.edu.au and https://oes.com/ are owned and operated by OES Australia. References to "OES" (or "we", "us" or "our") in this Privacy Policy apply to both OES Australia and OES UK unless otherwise specified.

The EZ/Extend product

EZ/Extend is a product provided by OES to automate and streamline the assignment extension process. A university that enters into an EZ/Extend Subscription Agreement with OES to use the EZ/Extend product is referred to as the "**Client**" in this Privacy Policy. Users of the EZ/Extend product are the Client's students and teaching staff. Users can request, review and approve assignment extensions. EZ/Extend is embedded within the Client's learning management system (**LMS**). EZ/Extend imports personal information from the Client's LMS.

We provide this product on a "software as a service" or "SaaS" basis. When providing EZ/Extend to a Client, OES is the data processor and processes personal information in accordance with the manner in which the Client configures the product. The Client is the data controller and determines the purposes of, and means for, processing personal data for the EZ/Extend product.

Refer to the EZ/Extend information available online for further information.

This Privacy Policy may be changed by OES from time to time. If we make any material change to this Privacy Policy, we will notify Clients by email (using the email address provided by the Client) prior to the change becoming effective.

Information processed

EZ/Extend collects personal information about the Client's students and teaching staff. As the data controller, the Client is responsible for determining and documenting the lawful basis (or bases) that applies to the processing of personal information in relation to the EZ/Extend product. The personal information used in EZ/Extend is sourced from

information already available within the Client's LMS platform and to which the Client grants access, and from personal information provided by students and staff. In this Privacy Policy, the term "**Transaction Data**" means data collected by the EZ/Extend product from the Client's LMS about students and staff, and data entered into the EZ/Extend product by students and staff, such as student identity and course details, dates related to the extension request, the general nature of and the reasons for extension request, and any textual statements entered by students in relation to the extension request.

Transaction Data also includes:

- Student name
- Student ID
- Student email
- Teacher name
- Teacher ID
- Teacher email

Additionally, EZ/Extend will handle the following personal information:

- evidence documents uploaded by students, which may include special category data (also known as sensitive information) such as medical information or medical certificates; and
- student or teaching staff comments (if enabled)
- reason code for extension (e.g., medical, or personal) (If enabled)
- date of application
- outcome of the extension request (i.e., approved or not approved).

Transaction Data will be available only to appropriate credentialed OES or Client personnel as part of the service, to enable Clients to run reports on their university's usage or for other support requests. Usage data is encrypted at rest, and in transit.

EZ/Extend does not use Transaction Data to make decisions about a student, nor for any student marketing or any other marketing purposes.

Notice and consent

EZ/Extend supports the Client meeting its personal information collection notice obligations by providing pop-up notice functionality which is managed by the Client. EZ/Extend also features a mechanism for students to provide consent before uploading evidence documentation that may contain special category data or sensitive personal information. The mechanism for privacy collection notice and consent management can be customised by the Client in line with relevant privacy regulations in the jurisdiction in which it operates.

Use and disclosure of personal information

Personal information processed by EZ/Extend is only used for the purpose of providing the service to the Client and managing extension requests. Personal information will not be used by OES for any other purpose. We do not sell or share personal information with third parties.

Transaction Data is used for enabling reporting functions offered within EZ/Extend. Reports will cover analytics such as volume trends by course, student or faculty, approval rates by teaching staff, and reason trends. This will happen on demand, by the Client, from within the tool. Clients can export this data for processing in a third-party tool (such as PowerBI). For the avoidance of doubt, Clients can only see and use their own data.

Data Processing Addendum

A Data Processing Addendum **(DPA)** is in place between OES and each EX/Extend client. The DPA forms part of the EZ/Extend Subscription Agreement.

Sub-processors and international transfers

The sub-processors currently engaged by OES as part of provision of the EZ/Extend product are as follows:

Sub-processor	Location of processing	Description of processing
Amazon Web Services (AWS)	As per Client's requirements	Application infrastructure for the EZ/Extend product

OES has a data processing agreement in place with AWS, pertaining to the data held and processed for Ez/Extend. Details on AWS security features are available here.

International data transfer agreements are in place for transfers of personal data between OES Group entities.

Protective measures

OES implements the following technical and organisational measures to protect the personal data processed by EZ/Extend from loss, unauthorised access, misuse, modification and disclosure:

1. Secure coding practices through enforced code reviews, automated security scans via static application security testing (SAST), and integrated security testing in our continuous integration and deployment (CI/CD) pipelines.

2. AWS controls such as AWS Security Hub and AWS GuardDuty.

3. Vulnerability management processes with regular scans to promptly identify and remediate vulnerabilities.

4. Limiting access to the Client's data based on a need-to-know principle.

5. Data encryption through AES-256 and DynamoDB / S3 / LTS_1_2_2021.

Storage and retention

EZ/Extend is hosted on AWS. The Client can choose an AWS site in which personal information will be processed and stored. All Client data is kept separate and stored in separate AWS S3 buckets.

Evidence documents uploaded by students will be stored and protected by the Client, in the Client's AWS S3 bucket. The Client is responsible for the processing of evidence documents, decides on the retention schedule and can restrict OES's access to the evidence documents, so that only the Client is able to access them.

The DPA provides more detail about the rights and obligations of the parties in relation to the retrieval and deletion of Transaction Data.

Data subject rights

As set out in the DPA, OES will provide the Client with reasonable assistance to enable the Client to respond to requests from persons exercising data subject rights in relation to Transaction Data.

How to contact us

How to contact OES Australia:

OES Australia (Online Education Services Pty Ltd) is an Australian registered company with its registered office and principal place of business at Level 1, 60 Cremorne St, Cremorne, Victoria, Australia 3121. You can **contact** OES Australia's Privacy Officer by (a) post, to Level 1, 60 Cremorne St, Cremorne, Victoria 3121, (b) using the Australian Website contact form, (c) telephone, on +61 (0)3 9956 0800, or (d) email, using the following email address: dataprivacy@oes.com

How to contact OES UK:

OES UK (Online Education Services Limited) is a company registered in England and Wales with its registered office and principal place of business at Charter Buildings, 9 Ashton Place, Sale, Manchester, United Kingdom, M33 6WTN. You can **contact** OES UK by (a) post, to Charter Buildings, 9 Ashton Place, Sale, Manchester, United Kingdom, M33 6WTN, (b) using the Website contact form, (c) telephone, on +44 (0)20 3890 6910, or (d) email, using the following email address: dataprivacy@oes.com

How to contact EDPO (European Data Protection Office), the OES EU Representative.

EDPO (**European Data Protection Office**) is a limited liability company incorporated under the laws of Belgium, with its registered office at Avenue Huart Hamoir 71, 1030 Brussels, Belgium and is registered with the Register of the Legal Entities of Brussels under number 0689.629.220. You can **contact** EDPO by (a) post, to Avenue Huart Hamoir, 71, 1030 Brussels, Belgium, (b) using the EDPO website contact form (https://edpo.com/contact/), or (c) email, using the following email address: info@edpo.com.