



## Privacy Policy

Effective: 9 February 2026

### 1. Introduction

This Privacy Policy explains how Excel HSC Copilot Pty Ltd (ABN 67 673 502 933) ("Excel HSC Copilot", "we", "us", or "our") collects, uses, stores, and protects personal information.

Excel HSC Copilot is an educational platform designed for Australian secondary school students, teachers, and school communities. We recognise that students' personal information requires a high level of care, and we are committed to handling information in a responsible, transparent, and respectful way.

This Privacy Policy has been prepared in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs), and reflects expectations for safe and appropriate technology use in Australian schools.

By using Excel HSC Copilot or providing personal information to us, you agree to this Privacy Policy.

We may update this Privacy Policy from time to time. Any updates will be published on our website and will apply from the date they are posted.

### 2. Our commitment to safe and responsible technology in schools

We design and operate Excel HSC Copilot specifically for use in school learning environments. Our approach aligns with the principles of Safe Technology for Schools, including:

- collecting only minimal personal information;
- avoiding unnecessary tracking, profiling, or surveillance of students;
- providing transparency and meaningful control to schools;
- supporting age-appropriate, educational use of technology; and
- prioritising student wellbeing, safety, and learning outcomes.

### 3. Personal information we collect

We collect only the personal information that is reasonably necessary to provide and support our educational Services.

This may include:

- name (or a chosen name);
- email address;
- school name and HSC year (where applicable);
- information provided through feedback, surveys, or support enquiries;
- basic technical information such as device type, IP address, and usage data; and

- interactions with AI-powered learning tools (such as questions asked and responses received).

Students are not required to verify their real-world identity, and may choose how they identify themselves within the platform.

#### **4. Personal information we do not collect**

We deliberately minimise data collection. We do not intentionally collect:

- home or mailing addresses;
- dates of birth or age;
- government-issued identifiers;
- social media account details;
- sensitive personal information (as defined under the Privacy Act);
- credit card or payment details (payments are handled securely by third-party providers such as Stripe, and we do not have access to full payment information); or
- information about personal, family, or financial circumstances.

#### **5. How we collect personal information**

We may collect personal information when you:

- create an Account or subscribe to Excel HSC Copilot;
- use the Services, including AI-powered features;
- contact us via our website or email;
- provide feedback or respond to surveys; or
- interact with our website through standard analytics tools.

We use limited cookies and analytics tools only to understand how Excel HSC Copilot itself is used and to improve the performance and reliability of our Services.

We do not track users across other websites, apps, or online services.

You can manage cookie settings through your web browser at any time.

#### **6. How we use personal information**

We use personal information only for purposes directly connected with providing and improving Excel HSC Copilot, including to:

- provide access to the Services and support learning activities;
- manage Accounts and subscriptions;
- communicate about updates, features, and support issues;
- improve platform performance, reliability, and educational quality;
- operate and support AI-powered learning tools; and
- meet legal and regulatory obligations.

#### **7. Use of Artificial Intelligence (AI)**

Excel HSC Copilot uses artificial intelligence (AI) in selected features to support teaching and learning, such as providing explanations, practice questions, and guided feedback. AI features are designed to complement classroom instruction and teacher guidance, not replace them.

### **AI service providers and identifiable information**

We use trusted third-party AI service providers, including OpenAI, Anthropic, and ElevenLabs, to deliver certain AI-powered features.

- We do not provide any identifiable student personal information to these providers.
- This includes names, email addresses, school details, or any information that could reasonably identify a student.
- Inputs provided to AI systems are limited to what is necessary for the feature to function and are not linked to student identities.

### **Use of AI interactions by third parties**

We take a strict approach to student data protection:

- We do not allow any external third-party AI providers to use interactions from Excel HSC Copilot for the training, fine-tuning, or improvement of their AI models.
- This applies to all AI interactions within the platform, including those of students and teachers.

### **Our internal use of AI interactions**

For school-managed accounts, student interactions with AI features are not used for internal AI training purposes by default.

- We may analyse de-identified and aggregated usage information to improve platform reliability, safety systems, and educational quality.
- This analysis does not identify individual students and is not used for profiling or assessment.

### **Responsible and appropriate use**

AI features include guardrails to support learning and discourage misuse (such as cheating). AI-generated content may occasionally be incomplete or incorrect, and users should apply independent judgement and teacher guidance when using AI tools.

## **8. Disclosure of personal information**

We do not sell personal information.

We may share limited personal information with:

- trusted service providers (such as hosting, infrastructure, and payment providers) who assist us in operating the Services; and
- regulators or authorities where required by law.

Our core databases are hosted in Australia, and student personal information (such as name, email address and school) remains stored in Australia.

## **9. Data security**

Protecting personal information is a priority for us. We use reasonable technical and organisational safeguards, including:

- encryption of data at rest and in transit;
- secure hosting within Australia;
- access controls to ensure users can only access their own data;

- isolated management systems accessible only to authorised personnel;
- multi-factor authentication for administrative access; and
- development and testing practices that do not use real student data.

While no online service can guarantee absolute security, we regularly review our systems and take data protection extremely seriously.

If we become aware of a data breach involving personal information, we will promptly assess the incident in accordance with the Privacy Act 1988 (Cth).

Where required, we will complete this assessment **as soon as practicable and no later than 30 days**, in accordance with the Notifiable Data Breaches scheme. If the breach is assessed as likely to result in serious harm, we will notify affected individuals and the Office of the Australian Information Commissioner (OAIC) **as soon as practicable**, as required by law.

## 10. Access, correction, deletion and retention of information

You have the right to:

- request access to the personal information we hold about you;
- request correction of inaccurate or outdated information;
- request a copy of your data; and
- request deletion of your Account.

### Account deletion

If you request deletion of your Account, we will:

- deactivate the Account promptly; and
- delete or de-identify associated personal information within one business day, except where we are legally required to retain certain records.

Once an Account is deleted, it can no longer be accessed.

### Retention and de-identification of student data

We are committed to minimising long-term retention of student data.

For student accounts associated with Year 12:

- personal information is retained only for a limited period following completion of the HSC to support account administration and support requests; and
- within four (4) months of completion of the HSC, student accounts are de-identified, meaning personal identifiers (such as name, email address, and school) are removed.

De-identified information may be retained for platform improvement, educational insights, and system integrity, but cannot be used to identify individual students.

We do not retain identifiable student data longer than is reasonably necessary.

## 11. Complaints

If you have concerns about how we handle personal information or any other matter, please contact us. We will investigate and will always endeavour to respond promptly and fairly.

**Protecting privacy and student safety is always our primary focus.**

If you are not satisfied with our response, you may contact the Office of the Australian Information Commissioner (OAIC).

## **12. Links to other websites**

Our website may contain links to third-party websites. While we are not responsible for the privacy practices of those websites, we encourage you to review their privacy policies before providing any personal information.

Where we include links to third-party websites, we aim to do so only where those sites align with similar expectations around privacy, security, and student safety. However, those websites operate independently, and their practices may change over time. If you have concerns about any linked website, please let us know so we can review it.

## **13. Contact us**

If you have questions about this Privacy Policy, or wish to access, correct, or delete your personal information, please contact us:

Email: [info@excelhscopilot.com.au](mailto:info@excelhscopilot.com.au)

## **Our commitment to privacy and student safety**

This Privacy Policy reflects how Excel HSC Copilot operates in real Australian school environments. We aim to earn and maintain the trust of students, parents, teachers, and schools by being transparent, careful, and responsible in how we handle personal information and educational technology.