

Loomi Privacy Policy

Last updated: 3 September 2025

When you use Loomi services, you trust us with your information. This Privacy Policy will help you understand what data we collect, why, and what we do with it. This information is important, so take some time to read it carefully.

You can use Loomi in a variety of ways. When you share information with us, for example by creating a Loomi Self-Service Account, we can improve those services by showing you relevant helpful support or helping you keep track of yours, and your students' progress. As you use our services, we want you to be clear on how we're using information and how you can protect your privacy.

We've tried to keep it as simple as possible, but if you're unfamiliar with technical terms like cookies, IP addresses and browsers, we've explained some key terms in the glossary at the end of this document. Whether you are new to Loomi or a long-time user, your privacy matters to us. We want you to be comfortable with our practices, so if you have any questions, please contact us at privacy@cleverbean.co.

1. About Loomi

Loomi is a learning platform that provides students with personalised, real-time feedback on their writing. Teachers select and activate lessons that they teach as normal using traditional teaching methods, and clearly introduce topics and skills to students using the gradual release of responsibility (I do, we do, you do). Once students reach independent practice (you do), teachers will instruct students to open their digital devices, log in to Loomi with the details their teacher provides, and then as students practise their writing. Loomi will then generate tailored feedback to the students linked to the lesson's learning intention and assessment criteria.

Following each lesson, teachers will receive real-time insights on students' progress and ability to meet the learning goals of that lesson. Over time (after students have practised on 5 or more lessons) teachers will also have access to broader class insights, breaking student writing capabilities down based on core writing skills, such as Sentence Structure, Vocabulary, Punctuation and Spelling.

2. The Information We Collect

We collect information to provide you with the best user experience. This information helps us understand where you may need support in your journey, or to suggest lesson content based on previous lessons taught and their results. We collect the following information:

For Teachers

- Name and email address (to create and manage a Loomi account).
- Login credentials.
- School name.
- Usage and interaction data with Loomi.

For Students

- **Self-service trials:**
 - **Student usernames and PIN:** Teachers create class lists that require each student to have a unique username and a PIN to log in. Students do not provide personal information or email addresses. This data is used for students to log in and for teachers to identify students when looking at their assessment reporting.
- **Whole-school implementations:** Schools may provide student email addresses or unique identifiers, in line with school or Department policies, to ensure consistent identifiers for students to track their progress in skills across the year and subsequent years.

Other Information

- Writing samples submitted by students.
- Automated feedback generated in response to student writing.
- Technical data (e.g., device type, operating system, browser, usage analytics, and cookies where applicable).
- Assessment data generated from student writing.
- Teacher and/or student survey responses. These are used only by Loomi's internal team to understand user experiences, improve the product, and report on non-identifiable

trends.

3. How We Use Information

We use collected information to:

- Deliver personalised, real-time feedback to students.
- Enable teachers to track student progress and identify support needs.
- Provide schools with insights into learning growth at class or cohort level.
- Improve Loomi's performance, accuracy, and usability.
- Conduct internal research and analysis to support better learning outcomes.

We will **never**:

- Sell personal data.
 - Use student data for advertising or marketing.
 - Build student profiles unrelated to educational purposes.
-

4. How We Share Information

We understand the importance of protecting your information and only share it in limited circumstances:

- **With your consent:** We may share personal information with companies, organisations or individuals outside of Cleverbean when we have your consent to do so. We require opt-in consent for the sharing of any sensitive personal information. For example, if you agree to provide a testimonial or participate in a survey, we may share anonymised or attributed information in line with the consent you provide.

- **With your school and teachers:** Teachers and authorised school staff can view the student writing samples, progress, and assessment data linked to their classes.
- **With school administrators:** If your Loomi account is managed by a school administrator (for example, in whole-school deployments), then your school administrator will have access to account information (including login identifiers and usage statistics). Your school administrator may be able to:
 - (a) view statistics regarding your account usage.
 - (b) view student writing samples, Loomi-generated feedback, any inappropriate language flagged by the system, and student assessment data.
 - (c) change account settings such as passwords.
 - (d) suspend or terminate account access.
 - (e) access or retain information stored as part of your account.
 - (f) receive account information to satisfy applicable law, regulation, legal process or governmental request.
 - (g) restrict your ability to delete or edit information or privacy settings.
 Please refer to your school administrator's privacy policy for more information.
- **With our trusted service providers:** We may engage third-party providers to help us deliver Loomi (for example, secure cloud hosting, analytics, or customer support). These providers only have access to the information necessary to perform their services and are contractually bound to keep it secure and confidential.
- **For compliance and safety:** We may disclose information where required to comply with the law, to protect the rights and safety of students and users, or in response to valid legal processes.
- **In de-identified form:** We may share aggregated or de-identified data for research, product development, to show trends about the general use of our services or for reporting purposes. This data cannot reasonably be used to identify any individual.

We do **not** share student information with advertisers or allow third parties to use data for their own commercial purposes.

If Cleverbean or Loomi is involved in a merger, acquisition or asset sale, we will continue to ensure the confidentiality of any personal information and give affected users notice before personal information is transferred or becomes subject to a different privacy policy. In such an event, if a future Privacy Policy does not comply with the principles outlined in the Student Privacy Pledge, you will have the choice to withhold the transfer of personal information.

5. AI, Data, and Learning Analytics

Loomi uses AI to analyse writing samples against learning intentions and assessment criteria. Student writing is processed securely and used only to provide feedback, generate progress insights, and improve the platform. Student data is not made available to any third party, including the Large Language Model (LLM) provider that supports processing.

We may de-identify and aggregate data to train and refine Loomi's models and to support product research. De-identified data cannot reasonably be used to identify an individual.

6. Data Storage and Security

- Data is stored securely on servers located in Australia (or in some cases, jurisdictions that meet Australian privacy standards).
 - Access is restricted to authorised staff and service providers.
 - We use industry-standard encryption and security measures to protect data.
-

7. Consent and Responsibilities

- In self-service trials, teachers are responsible for creating class usernames and sharing access with students. No personally identifying student data such as email addresses is collected. We encourage teachers to use student preferred names rather than full names to provide an extra layer of protection for student information.
 - In self-service trials, whole-school trials or fully licensed deployments, schools and teachers are responsible for ensuring that any required parental consent is obtained.
 - We work with schools and Departments to ensure compliance with local consent and data use requirements.
-

8. Data Retention

- **Self-service trial accounts:** Student data may be deleted within six months of the trial completion.

- **Whole-school deployments:** Data is retained for the duration of the agreement and securely deleted on request after termination.
 - Teachers or schools may request deletion of class data at any time.
-

9. Access, Correction, and Deletion

Teachers and schools can access, update, or delete data in Loomi via the platform or by contacting us directly. Students wishing to access or correct their information should do so via their teacher or school.

You may also contact us to request:

- Access to the personal information we hold about you.
 - Correction of inaccurate or incomplete data.
 - Deletion of information, subject to applicable laws and contractual obligations.
-

10. Cookies and Website Data

We use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your device for a set period of time or until you delete them). These help us operate Loomi effectively and improve your experience. We use the following types of cookies for the purposes explained below:

- **Essential operational:** These cookies are necessary to allow Loomi to function as you have requested. For example, they let us recognise your user type and provide you with services accordingly.
- **Performance and analytics:** We use these cookies to analyse how Loomi is accessed, used, or performing. This helps us maintain, operate, and continually improve the platform. We may also obtain information from email newsletters, including whether you opened or forwarded a newsletter or clicked on any of its content. This information tells us about our newsletters' effectiveness and helps us ensure that we're delivering information that you find interesting.

- **Functional:** These cookies let us operate certain Loomi functions in line with your choices. For example, remembering your username, how you have customised your settings, and reminding you of content you have recently viewed.
- **Third-party:** We may allow our service providers or business partners to use cookies for the same purposes identified above, including collecting information about your online activities over time and across different websites, to help us deliver and improve Loomi. These service providers are only permitted to use data in accordance with our instructions and applicable privacy laws.

Many web browsers allow you to manage your preferences. You can set your browser to refuse cookies or delete certain cookies. Please note that if you choose to block cookies, doing so may impair the working of Loomi or prevent certain features from functioning.

By using Loomi, you agree to the use of cookies and other technologies as described above.

11. Third-Party Services

We work with third-party service providers who help us deliver Loomi. These providers support functions such as cloud hosting, data storage, analytics, security, and customer support. We only share the minimum information necessary for them to perform their services on our behalf.

All third-party providers must comply with strict confidentiality and data protection obligations and are prohibited from using Loomi data for their own purposes. They are only permitted to process information in accordance with our instructions and applicable privacy laws.

We regularly review our service providers to ensure that they meet our privacy and security standards.

12. International Data Transfers

If data is transferred, stored or processed outside Australia, we ensure that equivalent privacy and security protections are applied, consistent with the Australian Privacy Principles.

13. Your Rights

You have rights under the Privacy Act 1988 (Cth), including to:

- Access the information we hold about you.
- Request correction of your information.
- Make a complaint if you believe we have mishandled your data.

To exercise these rights, please contact us at:

 privacy@cleverbean.co

14. Complaints

If you have a complaint about our handling of personal information, please contact us. We will respond within a reasonable timeframe. If you are not satisfied, you may lodge a complaint with the **Office of the Australian Information Commissioner (OAIC)** at www.oaic.gov.au.

15. Changes to This Policy

We may update this Privacy Policy from time to time. Any changes will be posted on our website and take effect upon posting. We encourage you to review this policy periodically.

16. Contact Us

If you have any questions about this Privacy Policy or how we handle your information, please contact us:

Cleverbean Pty Ltd

 privacy@cleverbean.co

Glossary

- **Cookies:** Small text files placed on your device by a website to store preferences, enable functionality, or track usage.

- **IP Address:** A unique number assigned to your device when it connects to the internet.
- **Browser:** The software application (such as Chrome, Safari, or Firefox) you use to access websites.