

# Privacy Policy

Last Updated: February 25, 2026

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## Introduction

Welcome to SchEase, a school management platform operated by Apex Rock Limited ("we," "us," or "our"). We are committed to protecting the privacy and security of personal information entrusted to us by schools, students, parents, and staff members.

This Privacy Policy explains how we collect, use, store, and protect your information when you use the SchEase platform (the "Service"). By using SchEase, you agree to the practices described in this policy.

**If you have questions about this Privacy Policy, contact us at:**

- Email: [info@apexrock.org](mailto:info@apexrock.org)
  - Phone: +234 703 125 0097
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## Our Commitment to Data Protection

SchEase is designed to help schools manage their operations while respecting the privacy rights of students, parents, and staff. We recognize that schools entrust us with sensitive information about minors and educational records.

**Our core privacy principles:**

- We collect only the data necessary to provide our Service
  - We never sell student, parent, or school data to third parties
  - We use bank-grade security to protect all information
  - Schools retain ownership and control of their data
  - We comply with Nigerian Data Protection Regulation (NDPR) and international best practices
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## 1. Information We Collect

### 1.1 Information Provided by Schools

When schools use SchEase, they provide us with information necessary to deliver our Service:

**Student Information:**

- Full name
- Email address and phone number
- Student identification numbers
- Class/grade level and section
- Parent/guardian contact information
- Academic records (attendance, grades, assessments)
- Fee payment history and outstanding balances
- Behavioral records (if entered by school)

**Parent/Guardian Information:**

- Full name
- Email address and phone number
- Payment information and transaction history

**Staff Information:**

- Full name, email address, phone number
- Role
- Timetable and class assignments

**School Information:**

- School name, address, and contact details
- Business registration information
- Fee structure and payment terms
- Curriculum and class structure
- Academic calendar and term dates

## **1.2 Information We Collect Automatically**

**Usage Information:**

- Login dates and times
- Features and modules accessed
- Device information (type, operating system, browser)
- IP addresses and location data
- Actions taken within the platform (audit logs)
- Voice input data: Temporarily processed on-device for speech-to-text conversion; not stored or transmitted in audio form

**Technical Information:**

- Cookies and similar tracking technologies
- Performance data and error logs
- Session duration and frequency of use

## 1.3 Information from Third Parties

**Payment Processors:** When parents make online fee payments, we receive transaction confirmation data from payment service providers (but we do not store full credit card or bank account details).

**Communication Services:** We use third-party services to send SMS and WhatsApp notifications. These providers receive phone numbers and message content necessary for delivery.

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## 2. How We Use Your Information

### 2.1 To Provide Our Service

We use collected information to:

- Enable school administration and operations
- Process student admissions and enrollment
- Track attendance and academic performance
- Generate report cards and academic transcripts
- Manage fee collection and payment processing
- Facilitate communication between schools, parents, and staff
- Provide access to educational resources (AI-powered e-library)
- Generate analytics and insights for school leadership

### 2.2 To Improve Our Service

We use aggregated, anonymized data to:

- Identify and fix technical issues
- Improve platform performance and user experience
- Develop new features based on usage patterns
- Conduct research on education management trends
- Train our AI models for better insights and recommendations

**Note:** When we use data for improvement purposes, we remove all identifying information and aggregate it across multiple schools so that no individual student, parent, or school can be identified.

### 2.3 To Communicate With You

We use contact information to:

- Send system notifications and platform updates
- Provide customer support and respond to inquiries

- Send security alerts and important service announcements
- Share product updates and new feature releases
- Conduct user satisfaction surveys (optional participation)

## 2.4 For Security and Compliance

We use information to:

- Detect and prevent fraud and security threats
  - Enforce our Terms of Service
  - Comply with legal obligations and regulatory requirements
  - Respond to lawful requests from authorities
  - Protect the rights and safety of our users
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## 3. How We Share Your Information

### 3.1 We DO NOT Sell Your Data

**We never sell, rent, or trade student, parent, staff, or school information to third parties for marketing or advertising purposes.** This is a fundamental principle of our business.

### 3.2 Sharing Within the School

Information is shared among authorized school personnel based on role-based access controls:

- **School Owners/Administrators:** Access to all school data
- **Teachers:** Access to information for their assigned classes and students
- **Bursars:** Access to financial and fee-related information
- **Parents:** Access only to their own child's information
- **Students:** Access only to their own academic records and resources

### 3.3 Service Providers

We share limited data with trusted third-party service providers who help us deliver our Service:

**Cloud Hosting Providers:** We use secure cloud infrastructure providers to host the SchEase platform and store data. These providers maintain bank-grade security standards and data encryption.

**Payment Processors:** When parents make online payments, transaction information is processed through certified payment gateways that comply with PCI-DSS standards.

**Communication Services:** We use SMS and messaging service providers to send attendance alerts, fee reminders, and school announcements. These providers receive only the phone numbers and message content necessary for delivery.

**Analytics Tools:** We use analytics services to monitor platform performance and user experience. These tools receive anonymized, aggregated data only.

**All service providers:**

- Are contractually obligated to protect your information
- May use data only to provide services to us
- Must comply with data protection standards equivalent to this Privacy Policy
- Cannot use your data for their own purposes

### 3.4 Legal Requirements

We may disclose information when required by law:

- In response to valid legal processes (court orders, subpoenas)
- To comply with regulatory requirements
- To protect the rights, property, or safety of SchEase, our users, or the public
- In connection with legal claims or investigations

We will notify affected schools of such requests unless prohibited by law.

### 3.5 Business Transfers

If Apex Rock is involved in a merger, acquisition, or sale of assets, user information may be transferred as part of that transaction. We will notify schools and provide choices regarding their data before any such transfer.

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## 4. Data Security

### 4.1 Our Security Measures

We implement enterprise-grade security measures to protect your information:

**Encryption:**

- All data transmitted between users and SchEase servers is encrypted using TLS (Transport Layer Security)
- Sensitive data stored in our databases is encrypted at rest
- Payment information is tokenized and never stored in plain text

**Access Controls:**

- Role-based access ensures users see only information relevant to their role
- Multi-factor authentication available for administrator accounts
- Regular access audits to identify and remove unnecessary permissions
- Automatic session timeouts for inactive users

#### **Infrastructure Security:**

- Secure cloud hosting with redundant data centers
- Firewalls and intrusion detection systems
- Regular security vulnerability assessments
- Isolated production and development environments

#### **Monitoring and Response:**

- 24/7 system monitoring for suspicious activity
- Automated alerts for security anomalies
- Incident response procedures for data breaches
- Regular security training for our staff

#### **Data Backup:**

- Automated daily backups of all school data
- Geographically distributed backup storage
- Regular backup restoration testing
- Rapid recovery capability in case of data loss

## **4.2 User Responsibilities**

Security is a shared responsibility. Users must:

- Keep login credentials confidential
  - Use strong, unique passwords
  - Report suspected security incidents immediately
  - Log out after using shared devices
  - Follow school policies regarding data handling
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## **5. Data Retention**

### **5.1 Active Accounts**

We retain information for as long as a school's account remains active and for reasonable periods thereafter to comply with legal obligations.

#### **During Active Use:**

- Student records: Maintained for current and past students as long as the school uses SchEase
- Academic history: Retained to provide multi-year trend analysis
- Financial records: Retained for accounting and audit purposes
- Communication logs: Retained for reference and dispute resolution

## 5.2 After Account Closure

When a school closes their account:

- Schools receive a complete export of their data in standard formats (CSV, PDF)
- We retain data for 90 days to allow for account reactivation
- After 90 days, we permanently delete all school data unless legal retention requirements apply
- Backups containing deleted data are purged within 180 days

## 5.3 Legal and Accounting Retention

We may retain certain information longer when required by:

- Nigerian tax and accounting regulations (typically 6 years)
  - Legal obligations or ongoing legal processes
  - Legitimate business purposes (anonymized data for product improvement)
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# 6. Your Rights and Choices

## 6.1 School Rights

As a school using SchEase, you have the right to:

**Access:** Request a copy of all data we hold about your school, students, and staff.

**Correction:** Update or correct inaccurate information at any time through the platform.

**Deletion:** Request deletion of specific records or your entire school account (subject to legal retention requirements).

**Export:** Download complete copies of your data in portable formats (CSV, PDF, JSON).

**Restrict Processing:** Request that we limit how we process certain information.

**Object:** Object to processing based on legitimate interests.

**Portability:** Receive your data in a structured, machine-readable format for transfer to another provider.

**To exercise these rights, contact:** [info@apexrock.org](mailto:info@apexrock.org)

## 6.2 Parent and Student Rights

Parents and guardians have rights regarding their child's information:

**Access:** View all information we hold about your child through the parent portal.

**Correction:** Request corrections to inaccurate information through your child's school.

**Deletion:** Request deletion of your child's records (subject to school retention policies and legal requirements).

**Restrict Access:** Request that your child's information not be shared in certain contexts (e.g., directory information, photographs).

**Note:** Since schools, not individual parents, are our direct customers, certain requests must be directed to your child's school rather than directly to us.

## 6.3 Communication Preferences

You can control certain communications:

### Parents:

- Opt out of non-essential communications while continuing to receive critical school announcements
- Choose preferred communication channels (email, SMS, WhatsApp)
- Adjust notification frequency through the parent portal

### Schools:

- Opt out of marketing communications and product updates
- Continue to receive essential service announcements and security alerts

## 6.4 Cookie Preferences

You can control cookies through your browser settings:

- Block all cookies (may affect platform functionality)
- Delete existing cookies
- Receive alerts when cookies are being set

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## 7. Children's Privacy

SchEase is used by schools to manage information about students, many of whom are minors under the age of 18.

## **7.1 NDPR Compliance**

We comply with the Nigerian Data Protection Regulation regarding children's data:

- We collect children's data only at the direction and with the authorization of schools
- Schools are responsible for obtaining parental consent where required
- We process children's data only for educational purposes authorized by schools
- We implement enhanced security measures for children's information

## **7.2 Parental Consent**

Schools using SchEase must:

- Obtain necessary parental consent for data collection and use
- Inform parents about how their child's information will be used
- Provide parents with access to their child's information
- Respect parents' rights to review and request changes

## **7.3 Student Data Protection**

We take extra precautions with student information:

- Student data is never used for advertising or marketing
- AI features using student data operate locally without external data sharing
- Students cannot be identified in any aggregated data or research
- Access to student information is strictly limited to authorized school personnel and parents

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# **8. International Data Transfers**

## **8.1 Data Storage Location**

SchEase data is primarily stored on secure cloud servers located in:

- Nigeria

If we use service providers with international operations, we ensure they:

- Maintain data protection standards equivalent to this Privacy Policy
- Comply with Nigerian Data Protection Regulation requirements
- Use appropriate safeguards for international data transfers

## **8.2 Cross-Border Transfer Safeguards**

When data is transferred internationally, we use:

- Standard contractual clauses approved by data protection authorities
  - Adequacy decisions recognizing equivalent protection standards
  - Other lawful transfer mechanisms as appropriate
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## **9. Third-Party Links and Services**

### **9.1 External Links**

SchEase may contain links to third-party websites, resources, or services (e.g., educational content providers). We are not responsible for the privacy practices of these external sites. We encourage you to review their privacy policies before providing any information.

### **9.2 Third-Party Integrations**

Schools may choose to integrate SchEase with third-party tools (e.g., accounting software, learning management systems). When you authorize such integrations:

- You grant SchEase permission to share relevant data with the third party
  - The third party's privacy policy governs their use of your information
  - You can revoke integration permissions at any time
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## **10. Changes to This Privacy Policy**

### **10.1 Policy Updates**

We may update this Privacy Policy periodically to reflect:

- Changes in our data practices
- New features or services
- Legal or regulatory requirements
- User feedback and best practices

### **10.2 Notification of Changes**

When we make material changes to this Privacy Policy:

- We will update the "Last Updated" date at the top
- We will notify schools via email and platform announcement
- We will provide at least 30 days' notice before changes take effect

- Continued use of SchEase after the effective date constitutes acceptance of changes

## 10.3 Right to Object

If you disagree with changes to this Privacy Policy:

- Contact us to discuss your concerns
  - You may close your account before changes take effect
  - We will provide a data export before account closure
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## 11. Contact Us

### 11.1 Privacy Questions

For questions or concerns about this Privacy Policy or our data practices:

**Email:** [info@apexrock.org](mailto:info@apexrock.org)

**Phone:** +234 703 125 0097

**Response Time:** We aim to respond to privacy inquiries within 5 business days.

### 11.2 Data Subject Requests

To exercise your rights (access, correction, deletion, etc.):

**Schools:** Log in to your account and use the data export tools, or contact [support@schease.cognixtech.org](mailto:support@schease.cognixtech.org)

**Parents/Students:** Contact your school first; they can assist with most requests. For requests schools cannot fulfill, contact [support@cognixtech.org](mailto:support@cognixtech.org)

### 11.3 Security Incidents

To report a suspected security incident or data breach:

**Email:** [info@apexrock.org](mailto:info@apexrock.org)

**Phone:** +234 703 125 0097 (urgent issues)

### 11.4 Regulatory Authority

If you believe we have not adequately addressed your privacy concerns, you have the right to lodge a complaint with:

**Nigeria Data Protection Commission (NDPC)**

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## 12. Specific Feature Privacy Details

### 12.1 AI-Powered Features

#### Student Insights and Analytics:

- AI analyzes student performance data to identify trends and at-risk students
- Processing occurs within our secure infrastructure
- Individual student data is never shared externally to train AI models
- Insights are visible only to authorized school personnel

#### AI E-Library:

- Tracks student progress through practice questions
- Provides personalized recommendations based on performance
- Data is used only to improve individual student experience
- Aggregated, anonymized usage data may inform content improvements

#### Predictive Analytics:

- Uses historical school data to forecast trends (enrollment, revenue, performance)
- Processing occurs entirely within your school's data environment
- Predictions are visible only to authorized school administrators
- We do not use your school's data to train models for other schools

#### Voice and Speech Features:

##### Speech-to-Text (AI Assistant):

- When you use the voice input feature, your device's microphone captures audio solely to convert your speech into text
- Audio is processed in real-time and is never stored, recorded, or transmitted to our servers
- The converted text may be sent to our AI assistant to provide a response, subject to the same data protections described in our AI-Powered Features section
- Microphone access is only activated when you explicitly initiate a voice input action
- You can revoke microphone permissions at any time through your device settings, which will disable the voice input feature without affecting other platform functionality
- Audio data is never used for advertising, profiling, or shared with third parties beyond what is necessary for speech-to-text conversion

### 12.2 Parent Portal and Mobile Access

#### Real-Time Notifications:

- Parents receive SMS, email, or WhatsApp notifications for attendance, announcements, etc.
- Parents control notification preferences through the portal
- Communication logs are retained for reference and dispute resolution
- Parents' phone numbers are shared with messaging service providers only for delivery

#### Online Fee Payments:

- Payment processing handled by PCI-DSS certified payment gateways
- SchEase receives transaction confirmation, not full payment card details
- Payment history is accessible to parents and school bursars only
- Transaction data retained for accounting and audit purposes

## **12.3 Communication Features**

### **Direct Messaging:**

- Messages between teachers and parents are stored securely
- Schools may monitor communications for safety and compliance

- Messages are not used for advertising or external purposes
- Retention follows school communication record policies

#### **Announcements and Broadcasts:**

- Mass communications sent via SMS, email, or in-app notifications
  - Delivery tracked for confirmation and follow-up
  - Parents can view announcement history through the portal
  - Usage data helps schools optimize communication effectiveness
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## **13. Legal Basis for Processing (NDPR Compliance)**

Under the Nigerian Data Protection Regulation, we process personal information based on the following legal grounds:

**Contract Performance:** Processing necessary to provide SchEase services as agreed with schools.

**Legal Obligation:** Processing required to comply with Nigerian law (e.g., tax records, regulatory reporting).

**Legitimate Interest:** Processing necessary for our legitimate business interests (platform improvement, security, fraud prevention) where not overridden by individual rights.

**Consent:** Processing based on explicit consent (e.g., optional marketing communications, optional features).

For children's data, we rely primarily on schools' authority to act in students' educational interests, supplemented by parental consent obtained by schools.

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**Thank you for trusting SchEase with your school's information. We are committed to protecting your privacy and earning your continued trust.**

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