

1. Who we are

Club Decode is operated by Influence Australia Pty Ltd (ABN 13 688 625 498) under the Club Decode brand. Privacy questions may be sent to hello@clubdecode.com.

2. Scope of this Policy

This Policy applies to personal information handled through the Club Decode website, application, parent account, child learning experience, Idea Vault, leaderboards, Decode Drops, support communications and related services.

Club Decode may be available internationally. Different privacy laws may apply depending on the location of the parent or child. We will comply with privacy obligations that apply to us and will not use this Policy to remove mandatory privacy rights.

3. Our parent-first account model

Club Decode accounts are created by a parent or legal guardian. The parent is the account holder and controls contractual, billing and parent-only account functions. A child may receive separate access credentials or a child session for the learning experience.

We ask parents not to create accounts using false information and not to share parent-only credentials with children.

4. Information we may collect from parents or guardians

name and email address;

account and authentication information;

subscription plan, subscription status and billing-related identifiers;

transaction and payment-status information received from payment providers;

delivery address when required for an authorised physical Decode Drop;

marketing consent and communication preferences;

support requests and communications;

security, fraud-prevention and technical information; and

legal-consent records, including Terms and Privacy Policy versions and acceptance timestamps.

5. Information we may collect about children

We aim to limit children's information to what is reasonably necessary to operate the learning service and associated features. Depending on features used, this may include:

first name or approved display name;

child username or access information used for the child login system;

lesson progress and completed lessons;

XP, Future Ready Score, rank and achievement information;

quiz answers and learning activity responses;

Idea Vault submissions and associated submission status;
Decode Drop eligibility and redemption status;
technical/security information reasonably necessary to operate the child session; and
limited activity information required to provide, secure and improve the service.

6. Information we do not intend to require from children

Under the current Club Decode product model, we do not intend to require or publicly display children's photographs. We also do not intend to require children to provide surnames, home addresses, personal email addresses, telephone numbers, school names, full dates of birth or payment information for ordinary learning activities.

A delivery address may be collected from the parent for a physical Decode Drop, but it should remain within parent-controlled account and fulfilment processes rather than child-facing or public areas.

7. How we collect information

directly from the parent when an account is created or updated;
from the child when the child completes learning activities or submits an idea;
automatically through authentication, security and service-operation technologies;
from payment providers such as Stripe in relation to subscriptions and payment status;
from support interactions; and
from service providers acting for Club Decode where necessary to provide the service.

8. Why we use information

create, authenticate, secure and manage accounts;
provide lessons, quizzes, progress and personalised access states;
record completions, XP, ranks and achievements;
operate memberships, trials, subscriptions and cancellations;
operate Idea Vault challenges and submissions;
operate leaderboards using limited child display information;
determine and fulfil Decode Drop eligibility and redemptions;
provide customer support and parent communications;
send marketing to parents who have consented or where otherwise permitted by law;
prevent fraud, abuse and security incidents;
maintain, troubleshoot and improve the service;
comply with legal obligations and resolve disputes; and
protect users, Club Decode and other people.

9. Legal and consent basis

The parent or legal guardian creates the account and authorises the child's use of Club Decode. We collect and use information where necessary to provide the service requested by the parent, administer

the account and subscription, meet legal obligations, protect legitimate security and operational interests, and where applicable obtain consent for particular activities.

Where a jurisdiction requires a particular form of parental consent or another lawful basis for processing children's personal information, we will implement the required mechanism before relying on that processing in that jurisdiction.

10. Leaderboards and public recognition

Leaderboards may display a child's first name or approved display name together with achievement information such as XP or rank. We do not intend to publish the child's surname, email address, address, payment information or photograph.

Idea Vault winners or selected entries may be recognised using the same limited first-name/display-name approach. We may display the idea or a summary where permitted under the Idea Vault terms.

11. Idea Vault and free-text information

Idea Vault submissions may contain text written by a child. Parents and children should avoid including surnames, addresses, telephone numbers, school names or other unnecessary identifying information in submissions.

Because free text can unintentionally contain personal information, we intend to use reasonable product, moderation or preprocessing measures to reduce unnecessary identifiers before sharing content with an external provider where practicable.

12. Artificial intelligence

Club Decode may use third-party artificial intelligence services to assist with functions such as categorising, summarising, analysing or generating feedback about Idea Vault submissions or educational ideas.

Our intended safeguards include:

- send only information reasonably necessary for the AI task;

- use an internal submission identifier instead of a child's name where practicable;

- do not intentionally send parent email addresses, surnames, home addresses, payment details, Firebase account identifiers or child authentication credentials for ordinary Idea Vault analysis;

- reduce obvious personal identifiers contained in free text where practicable;

- assess the AI provider's privacy, security, retention and training terms before production use; and

- retain human oversight for material Idea Vault winner or finalist decisions.

If our use of AI materially changes, we will review this Policy and provide additional notice or consent where required.

13. Service providers

We use third parties to help operate Club Decode. Current or planned categories of providers include cloud hosting and databases, authentication, payments, email delivery, analytics, security, support and AI processing.

The current technical architecture includes Google/Firebase services and Stripe. Before production use of additional material providers, including a production AI or analytics provider, we will assess the information shared and update disclosures where appropriate.

14. Payments

Stripe or another authorised payment provider may collect payment-card information directly. Club Decode does not intend to store full payment card numbers or CVV/security codes in its own application database. We may receive identifiers and payment-status information needed to manage the subscription.

15. Cookies, authentication and analytics

Club Decode may use cookies, local storage or similar technologies that are necessary to keep users signed in, maintain secure sessions, remember essential preferences, protect the service and operate functionality.

We may introduce privacy-conscious analytics to understand technical performance and product usage. We do not currently authorise behavioural advertising profiling of children as part of the Club Decode product model. Before introducing material non-essential tracking, advertising pixels or similar technologies, we will assess the applicable privacy and consent requirements and update this Policy or user controls where necessary.

16. Marketing communications

Marketing communications are intended for the parent or guardian account holder. Marketing consent is separate from acceptance of the Terms & Conditions and should be optional at account creation.

Where Australian spam laws apply, commercial electronic messages will be sent with the required consent or other lawful basis, identify the sender and provide a functional unsubscribe mechanism. Australian guidance requires unsubscribe requests to be honoured within 5 working days.

17. Disclosure and overseas processing

Some service providers may store or process information outside Australia. The countries involved can depend on the provider, configuration, support arrangements and service architecture.

Where applicable privacy law requires us to take steps before an overseas disclosure, notify users of likely overseas disclosures, or protect information through contractual and organisational safeguards, we will take the steps required. We will review actual production data locations before launch and whenever material providers change.

18. Data security

We use reasonable technical and organisational safeguards designed to protect personal information from misuse, interference, loss and unauthorised access, modification or disclosure. Measures may include authenticated access, server-side authorisation, role separation, secure cloud services, limited access to production data, encryption supported by service providers, audit logging and credential-management practices.

No online service can guarantee absolute security. Parents should use strong passwords and keep parent and child credentials private.

19. Data retention

We retain personal information for as long as reasonably necessary to provide the service, maintain security and records, resolve disputes, fulfil rewards, meet accounting or legal requirements and support legitimate business operations. Different categories of information may have different retention periods.

When information is no longer required, we will take reasonable steps to delete, de-identify or securely dispose of it where required or appropriate, subject to legal and technical constraints.

20. Account and data deletion

Parents may request deletion using the built-in account deletion system when available or by contacting hello@clubdecode.com. We may need to verify the parent's identity before deleting an account or child information.

Deletion may not immediately remove information that we must retain for legal, accounting, fraud-prevention, security, dispute-resolution or backup purposes. Where retention is necessary, access should be limited to the relevant purpose.

21. Access and correction

Parents may request access to or correction of personal information associated with their account or child by using available account features or contacting hello@clubdecode.com. We may request identity verification and may refuse or limit a request where permitted by applicable law, explaining the reason where required.

22. Privacy complaints

Privacy questions or complaints may be sent to hello@clubdecode.com. We will review the matter and respond within a reasonable period. If applicable privacy law gives a person the right to escalate a complaint to a regulator, this Policy does not remove that right.

23. Australian Privacy Act and small-business coverage

The Privacy Act 1988 (Cth) and Australian Privacy Principles apply to Australian Government agencies, organisations above the relevant turnover threshold and certain other organisations or activities. Some small businesses with annual turnover of \$3 million or less may be exempt unless an exception applies or they opt in.

Club Decode aims to adopt strong privacy practices appropriate to a child-focused service regardless of whether every provision of the Privacy Act applies to Influence Australia Pty Ltd at a particular time. This statement is not a representation that the company has formally opted in to Privacy Act coverage.

24. Children's Online Privacy Code

Australia is developing a Children's Online Privacy Code for certain online services. As at 17 August 2026, the final Code had not yet been registered and must be registered by 10 December 2026. Club Decode+ will review the final Code, assess whether and how it applies, and update product practices, notices and consent mechanisms where required.

25. International privacy rights

Where Club Decode is offered to users outside Australia, mandatory local privacy rights may apply. Depending on the jurisdiction, these may include rights relating to access, correction, deletion, restriction, objection, portability, consent withdrawal or complaints. We will respond to valid requests as required by applicable law.

26. Changes to this Policy

We may update this Privacy Policy to reflect changes in the service, technology, providers or law. We will update the version/effective date and provide additional notice where a change is material or where law requires it. If a new use of children's information requires additional parent consent, we will seek that consent before relying on the new use.

27. Contact

Privacy enquiries, access/correction requests, complaints and deletion requests may be sent to: hello@clubdecode.com

28. Consent and marketing controls at signup

Club Decode should store the policy versions and acceptance timestamps associated with the parent account. Marketing preference should be stored independently so a parent can withdraw marketing consent without affecting the account or subscription.

Legal framework note

The drafting approach was checked against current public guidance from the Australian Competition and Consumer Commission (ACCC), the Office of the Australian Information Commissioner (OAIC), and the Australian Communications and Media Authority (ACMA). The Australian Children's Online Privacy Code was still in development as at the effective date and is expected to be registered by 10 December 2026. Club Decode should review the final Code when registered and update its product practices and documents if required.

Official guidance reviewed

ACCC - Consumer rights and guarantees

ACCC - Contracts and unfair contract terms

OAIC - Children's Online Privacy Code

OAIC - Australian Privacy Principles guidelines

ACMA - Avoid sending spam