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The following information is designed to assist educators and administrators make an assessment regarding access and use of the ESSI Money game for their students. This is a summary of information previously provided to a number of state and territory education departments.

If you can't find the information you require on this page, please email our National Program Manager <u>damian@financialbasics.org.au</u> for assistance.

Government of Western Australia Department of Education employees: The <u>ESSI Money Game Security</u> and <u>Privacy Assessment Risk Assessment</u> & <u>ESSI Money Game Assessment Report</u> are available for download and use.

General information

Product Name and Version

ESSI Money v2.0.

Purpose and Functionality of the ESSI Money game

- ESSI Money is an online financial literacy game for Australian secondary school students. ESSI
 Money v2.0 is a closed system game that uses an interactive app-style interface to replicate a
 range of real-life financial transactions across a condensed, simulated timeframe. Twenty-six
 weeks of real-life financial decision making occurs across 2-3 hours of game play.
- ESSI Money complies with the privacy provisions of the <u>Australian Privacy Principles</u>(APP). Financial Basics Foundation <u>Privacy Policy</u>.
- ESSI Money does not have an overseas user base, nor is user data stored or processed overseas.
- ESSI Money's intended users are teachers and students. ESSI Money does NOT target students or minors; all registrations to play the game must occur via a teacher or other registered educator.
- ESSI Money utilises open-source code. The security and integrity of third-party code are assured by the game's developers only using major reputable code libraries.

ESSI Money's licensing model

The software is free to all Australian educators. Access requires the creation of a Financial Basics Foundation teacher account utilising an education authority email address.

Legal Entity Organisation

Financial Basics Foundation, ACN 114 612 270.

Total Number of Employees: 5



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Data storage and hosting

- ESSI Money utilises <u>Microsoft Azure Australia</u>, a third-party cloud service hosted within Australia, for:
 - Hosting and delivery of the game (data centre).
 - Backups (stored behind authentication).
 - System administrator access & access to sensitive data (stored behind Microsoft Azure Active Directory).
 - Prevention of unauthorised access to data (Microsoft Azure Active Directory permissions are required to access live data).
 - Role-based access control (used to control employees' access to user data within ESSI Money and associated technologies. Microsoft Azure access at the appropriate level is required for developers to access live websites and databases).
 - Access, security and event logs;
 - To prevent copying or theft of data by employees, all access to the system is logged, so any data that is accessed, copied, etc., can be tracked.
 - Logs are retained for a maximum of 30 days.
 - Access to these logs is granted to internal administrative staff only.
 - Triage and management of security events and incidents are managed via Microsoft Azure Application Insights.
- Microsoft Azure Australia is certified and used by Education Departments throughout Australia
 and conforms to all major security practices (including the <u>APP</u>) and does not publish the physical
 security mechanisms they have for their cloud facilities.
- The administrative staff of Microsoft Azure Australia are the only individuals who have access to the physical environment where user data is stored and processed.
- No mobile app is provided for ESSI Money. Access is via web browser only.

Access and Authentication

- Users authenticate to ESSI Money via unique username (education authority email address) and password.
- All user access requests must be from a verified school email address.
- ESSI Money requires a minimum password length and complexity.
- Approved Financial Basics Foundation staff with Administrative access are responsible for managing the creation, provisioning, maintenance, and de-provisioning of user accounts for ESSI Money.
- Passwords are secured via hashing (without encryption).
- Multi-Factor Authentication (i.e. MFA, 2FA) is not supported.
- ESSI Money is accessed via a web browser and does not access any other apps on the user's device.
- There are no age restrictions on ESSI Money and parental consent is not required. Access to the game is granted to a student or class by an educator with a Financial Basics Foundation 'teacher' account.
- The creation of an ESSI Money account creates an in-solution browsable profile for each user.



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Security Assurance

- ESSI Money has been through numerous security audits and penetration testing, and this work is ongoing.
- Vulnerability and penetration testing are completed with every release, in addition to regular ongoing testing.
- No sensitive personal data is stored or processed by the ESSI Money game.
- Neither the ESSI Money game nor any other Financial Basics Foundation systems have ever been subject to a data breach.

Data security & privacy

- All test data in development environments is stored on secure servers. Login to test servers requires authentication.
- ESSI Money does not integrate with, nor allow authentication through, social platforms.
- Data is NOT transferred or disclosed to jurisdictions outside of Australia.
- Support providers access data from within Australia.
- No remote access rights are granted to the ESSI Money game environment.

Personal data that is utilised and stored by ESSI Money:

- Staff and Teachers:
 - Staff Name
 - Staff Email Address
 - School Name
 - Subject
 - Year level
 - School Affiliation
- Students:
 - Student name Use of a real student name is optional. Students may also enter a pseudonym, their initials, etc.
 - Student email address
 - Student YEAR of birth
 - Student gender
- User profiles and data at rest and in transit across all our websites are protected using TLS 1.2, and the database transmits encrypted information through TCP.
- State and territory education departmental data is not segregated from other user's data.
- <u>Liquid Interactive</u>, the developer and top-level technical support provider for ESSI Money, is the only third-party with access to user data.
- No ESSI Money game support or administration function is outsourced.
- All new Financial Basics Foundation employees must have a current Working With Children Blue Card (Queensland) or equivalent for their state/territory. Successful application for and holding one of these cards involves a criminal history check.
- Deidentified summaries for ESSI Money are shared (never sold) to sponsors, research partners, government agencies for reporting purposes - that is, statistics and demographics on resource usage.
- There is no advertising or user-generated content within the ESSI Money game.
- FBF collects only data that constitutes the minimum possible requirement necessary to operate ESSI Money and fully supports the principle of 'data minimisation' under the <u>APP</u>.
- ESSI Money utilises features that ensure 'Privacy by Design', such as enforcing high privacy settings by default. For example, there is no unnecessary visibility of other users of the service, no marketing or advertising, no links to unnecessary services, no geolocation, and no tracking.



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Data access

- Users can request account closure and deletion of their profile and all associated data. Account
 closure and deletion of user profile and all associated data will be certified by the Financial Basics
 Foundation to the user and/or the applicable Education Department. Note: Data is deleted
 immediately, but not from any backups taken before the request.
- Audit logs and user access levels are regularly reviewed.
- No printed copies of data are created or stored.
- ESSI Money password reset protocol is for students to request a password reset email via the ESSI Money game login screen.
- Change control processes have been implemented to minimise disruption during business hours.
- ESSI Money uses data loss prevention technologies. Users are notified of any data corruption/loss, including the nature and extent of the incident.
- ESSI Money Recovery Time Objective is one business day.
- ESSI Money Game backup data is retained for greater than one year.
- Financial Basics Foundation owns all ESSI Money game data. No user content is created within the game.
- User data is NOT utilised with the purpose to target the sale of additional services or products.
- In the event of the discontinuation of ESSI Money to schools, upon application, Financial Basics Foundation will provide a complete dataset of all applicable Education Department or student user accounts held at that point in time. Completing this request would require a list of schools classified as being included within the applicable Education Department.
- Users are notified of changes to Terms and Conditions via publication to the Financial Basics Foundation website <u>Terms and Conditions</u> page.