



Privacy Policy

This Privacy Policy was published on June 23rd 2019.

It took effect on the same date.

We at RoosterMoney care deeply about your privacy. We believe in transparency, and we're committed to being upfront about our privacy practices, including how we treat your personal data.

RoosterMoney is the trading name of World Learning Limited (“**RoosterMoney**”, “**we**”, “**us**”, “**our**”) and corporate details are provided at the end of the policy.

This policy forms part of the [RoosterMoney Tracker Conditions](#) and [RoosterMoney Payment Conditions](#) (together the “**Service Terms**”). It describes what information we collect in connection with the Service Terms in the course of providing the relevant services under those Service Terms (“**Services**”), as well as how we collect it, what we do with that information, the legal basis for processing and the rights and choices you have over how we use your data. This policy covers the personal data of both parents and their children. In order for us to be able to provide the Services to you, it is necessary for you to enter into the Service Terms, including the Privacy Policy, which then enable us to collect, process, share and store the personal data as described in this policy to operate those Services.

Capitalised terms used in this policy that are not defined where they first appear shall have the meaning given in the Service Terms.

The following terms take the meaning given to them in the Data Protection Act 2018: **controller, processor, data subject, personal data, personal data breach, data protection officer.**

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Any previous version(s) of this policy can be viewed [here](#).

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[**1. Our Role as Controller**](#)

We collect certain personal data described below when you and your family use our Services and through other interactions and communications you and they have with us.

We are the party responsible for deciding the means and purposes for processing this personal data, which makes us a "controller" under the Data Protection Act 2018. If you have any questions or concerns at any time about your data or privacy, please email us at hello@roostermoney.com.

Other service providers may also act as controllers in relation to your personal data:

- If you sign up for the paid RoosterPLUS subscription through our website, we use Stripe to process payments. In connection with this service that Stripe provides to RoosterMoney, Stripe will collect your email address, card details and Billing Information in order to securely process your subscription payment. The information that you provide through Stripe is subject to the Stripe Privacy Policy. You should read the [Stripe Privacy Policy](#) to learn about Stripe's information collection, usage and your rights in that regard.
- If you sign up for the paid RoosterPLUS subscription from an iOS device, we rely on Apple iTunes to process the payments and manage the subscription. The information that you provide to Apple is subject to the Apple Customer Privacy Policy. You should read the [Apple Customer Privacy Policy](#) to learn about Apple's information collection, usage and your rights in that regard.
- If you sign up for the paid RoosterCard subscription through the app, we use Adyen to process payments. In connection with this service that Adyen provides to RoosterMoney, Adyen will collect your email address, IP address, card details and billing information in order to securely process your subscription payment. The information that you provide through Adyen is subject to the Adyen Privacy Policy. You should read the [Adyen Privacy Policy](#) to learn about Adyen's information collection, usage and your rights in that regard.

[2. Information we collect](#)

We may collect, store and use the following kinds of personal data for processing on the basis specified in Annex A at the end of this Privacy Policy.

- Personal data to create your account
- Content you choose to upload to the app
- Email address and email preferences
- Usage information
- Log data and device information
- Cookies and similar technologies

3. Your children's information

While this policy is governed by English law, we acknowledge that the Children’s Online Privacy Protection Act (“COPPA”) in the United States represents best practice by prohibiting online service providers from knowingly collecting personal data (which includes “personal information” as defined in COPPA) from children under 13 years of age without verifiable parental consent or notice as applicable (“Consent”). Children under the age of 13 are prohibited from using certain features of the Service without Consent.

We are committed to protecting children’s online privacy and complying fully with COPPA. We do not collect any personally identifiable information anywhere on our website or App except where expressly stated. We believe that children should be able to use the Internet in a safe, productive and efficient manner and should be afforded the highest protection available with respect to their personal data.

For that reason, the signup flow for the Service ensures that the individual registering for the account is a parent, and that the parent is over 18 years of age.

RoosterMoney does not permit interest-based advertising on our website or App directed to children under 13 or where we have actual knowledge that a child is under 13.

We work with third party service providers Google Analytics and Mixpanel to better understand your child's use of the service and to improve it. This data is not shared with any other third parties. For more information on Google Analytics click [here](#) and for more information on Mixpanel, click [here](#).

We do not ask for more personal data than is necessary for a child to participate in an activity.

- We take steps to prevent children from posting or publicly disclosing personal data.
- Parents can update or delete their children's personal data within the app ([this help article shows you how](#)).
- Parents can revoke their consent and refuse the further use or collection of personal data from their child.
- Process for parents accessing, deleting or withdrawing consent:
 - Should a parent wish to access or delete the information we've collected from their children (subject to our record-keeping obligations under applicable law) they can do so by deleting their child's profile from within the RoosterMoney app (see how). Alternatively they can contact us by email at hello@roostermoney.com.
 - The email must contain all of the following:
 1. the parent and account holder's email address
 2. the child's username
 3. The parent's relationship to the child.

How do we notify parents?

- When a parent creates a RoosterMoney account, we let the parent know that the parent's consent is required for the collection, use, or disclosure of any personal contact information for the child (the "personal data"), and that we will not collect,

use, or disclose any personal data from the child if the parent does not provide such consent;

- We set forth the additional items of personal data that we may collect from the child, or the potential opportunities for the disclosure of personal data, should the parent provide consent;
- We offer a hyperlink to our privacy policy in the email; and
- We let the parent know how they can provide consent to the collection, use, and disclosure of the information.

4. Cookies & Tracking

When you visit any web site, it may store or retrieve information on your browser or device, mostly in the form of cookies. This information might be about you, your preferences or your device and is mostly used to make the site work as you expect it to. The information does not usually directly identify you, but it can give you a more personalised web experience.

Because we respect your right to privacy, you can choose not to allow some types of cookies. However, blocking some types of cookies may impact your experience of the site and the services we are able to offer.

We may use the following types of Cookies:

- **Necessary cookies:** those required for the operation of the Service, which do not gather information about you that could be used for marketing or remembering where you have been on the internet.
- **Analytical/performance cookies:** these allow us to collect information about how you use the Service, such as, how you move around our website and if you experience any errors. These cookies do not collect personal data. The information collected is anonymous and is only used to help us improve the way the Service works, understand what interests our users generally and measure

how effective our advertising is. Some of the performance cookies we use are issued as part of services provided by third parties, like Google Analytics.

- **Functionality cookies:** these are used to provide services or to recognise you when you return to our website. These would enable us to personalise our content for you, remember your preferences and improve your visit.
- **Targeting cookies:** these record your visit to the Service, the pages you have visited and the links you have followed. They are set by and linked to services provided by third parties, such as “Like” and “Share” buttons. The third party provides these services in return for recognising that you have visited our website. The third party may subsequently use information about your visit to target advertising to you on other websites and present you with advertisements that you may be interested in.

You are able to reject the use of cookies with browsers. Some browsers allow you to reject all cookies; others, only allow you are to reject third party cookies. You will be able to manage your cookie preferences for your browser by accessing your browser’s Tools section (here are instructions for some commonly used browsers: [Chrome](#), [Internet Explorer](#), [Firefox](#)).

The 3rd party services we use listed below may use Cookies to identify Users or they may use the behavioral retargeting technique, i.e. displaying messages tailored to the User’s interests and behavior, including those detected outside this Application. For more information, please check the privacy policies of the relevant services.

1. Google Analytics ([Privacy Policy](#))
2. Mixpanel ([Privacy Policy](#))
3. Facebook Advertising ([Privacy Policy](#))
4. Google Advertising ([Privacy Policy](#))
5. Intercom ([Privacy Policy](#))

Log file information will automatically be reported by your browser or mobile application each time you access our Sites or the RoosterMoney app. For example, when you access our RoosterMoney site, our servers automatically record certain information that your web browser sends whenever you visit any website. These server logs may include information such as your web request, IP address, browser type, referring / exit pages and URLs, number of clicks, domain names, landing pages, pages viewed and other such information.

Web beacons may be used via our 3rd party email service providers Mixpanel and Mandrill, to help us understand whether users have read our email messages and clicked on the links contained within those messages. This allows us to measure the performance and impact of our messages.

5. Choice and Control

We know that our RoosterMoney families value having control over their own information, so RoosterMoney gives you the choice of providing, editing or removing certain information, as well as choices about how we contact you. You may change or correct your family's account information through your account settings within the RoosterMoney app. You can also request the deletion of the personal information in your account.

You may also control the receipt of certain types of communications from RoosterMoney in your account settings. RoosterMoney may send you messages about the Service or your activity. Some of these messages are required, service-related messages for members (such as major changes to the services that will significantly impact you or legal notices). Other messages are not required, such as newsletters. You can control which optional messages you choose to receive by changing your account settings.

6. International data transfers

To facilitate our global operations RoosterMoney may transfer, store, and process your information with service providers based outside of Europe, e.g. North America. Laws may differ from the laws applicable to your Country of Residence. Where we transfer store, and process your personal information outside of Europe, we have ensured that appropriate safeguards are in place to ensure an adequate level of data protection, such as working with 3rd party providers that are certified under the EU-US Privacy Shield principles.

7. Kids Privacy Assured by PRIVO: COPPA Safe Harbor Certification

Rooster Money (owned and operated by World Learning Ltd) is a member of the PRIVO Kids Privacy Assured COPPA Safe Harbor Certification Program (“the Program”). The Program certification applies to the digital properties listed on the validation page that is viewable by clicking on the PRIVO Seal.



PRIVO is an independent, third-party organization committed to safeguarding children’s personal information collected online. The PRIVO COPPA certification Seal posted on this page indicates Rooster Money has established COPPA compliant privacy practices and has agreed to submit to PRIVO’s oversight and consumer dispute resolution process. If you have questions or concerns about our privacy practices, please contact us at +44 (0)808 178 5352 or privacy@roostermoney.com. If you have further concerns after you have contacted us, you can contact PRIVO directly at privacy@privo.com.

8. Security of your personal information

The security of your personal data is important to us. We take appropriate security measures to prevent unauthorised access, disclosure, modification, or unauthorised destruction of data collected.

We will take all reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal data. We will store all the personal data you provide on our secure (password- and firewall-protected) servers. You must use Access Codes to log-in to your own Parent Account.

Data transmission over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

Your account information is protected by the measures described above, which require you to use the Access Codes to log-in to your Parent Account. We will not ask you for your Access Codes (except when you log in to the Service). It is important that you protect against unauthorised access to your account and information by choosing your Access Codes carefully and by keeping your Access Codes and computer secure, such as by signing out after using the Service.

If you have any questions about the security of your personal data, you can contact us at hello@roostermoney.com.

9. Retention

RoosterMoney will retain your information only for as long as is necessary for the purposes set out in this policy, for as long as your account is active (i.e., for the lifetime of your RoosterMoney member account), as described in this policy, or as needed to provide the Service to you. If you no longer want RoosterMoney to use your information to provide the Service to you, you may close your account (this [article](#) shows you how). RoosterMoney will retain and use your information to the extent necessary to comply with our legal obligations. We also retain log files for internal analysis purposes. These

log files are generally retained for a brief period of time, except in cases where they are used for site safety and security, to improve site functionality, or we are legally obligated to retain them for longer time periods.

10. Your Rights

The table in Annex B at the end of this Privacy Policy explains the following rights you may have in relation to your personal data under the Data Protection Act 2018 (and any exceptions to those rights) and how you can exercise them:

- Right of access
- Right to rectification
- Right to erasure
- Right to request the restriction of processing concerning you
- Right to data portability
- Right to object to processing
- Right to ask us not to process your personal data for direct marketing purposes
- Right not to be subject to automated individual decision-making, including profiling

Please note that this Privacy Policy provides the confirmation referred to in relation to the Right of Access.

California Civil Code Section § 1798.83 permits users of our software and services who are California residents to request certain information regarding our disclosure of personal data to third parties for their direct marketing purposes. To make such a request, please send an e-mail to hello@roostermoney.com.

11. Privacy policy changes

We may amend or update this policy from time to time. If we believe that the changes are material, we'll let you know by sending you an email message to the email address

provided at registration about the changes. You should check this page occasionally to ensure you are happy with any changes. By using the site and apps, you agree to any amendments we make to this policy.

12. Third party websites

The Service may contain links to other websites. We are not responsible for the privacy policies or practices of third party websites.

13. Our details

World Learning Limited (trading as “RoosterMoney”), is a company incorporated in England and Wales (company number 06830114) with its registered office at 64 New Cavendish Street, London, W1G 8TB and business offices C/O Co-Work, 3rd Floor, 109 Borough High St, London SE1 1NL. We are registered with the Office of the Information Commissioner (registration number: ZA374824).

Our phone number is +44 (0)808 178 5352

If you have any questions about this privacy policy or our treatment of your Personal Information, please email us: hello@roostermoney.com.

14. Annex A

Personal Data Collected	Purpose	Basis for Processing
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<p>a) When you sign up for a RoosterMoney account, we may ask for and collect the following personal data in order to create an account for your family:</p> <ul style="list-style-type: none"> ● First name ● Last name ● Residential address ● Email address ● Password ● Any “nickname” you provide for identification ● Account currency <p>b) When adding a child to your RoosterMoney account, We ask for and collect the following personal data:</p> <ul style="list-style-type: none"> ● Child’s first name ● Date of birth ● Gender ● The currency they will earn 	<ul style="list-style-type: none"> ● To provide and administer the RoosterMoney services of allowance tracking for your children and the related features you and they can use when managing their virtual earning and savings. ● In order to create your family’s RoosterMoney account ● To sync the data provided across the family unit you’ve set up in RoosterMoney ● To verify your identity when you reach out to RoosterMoney for help or customer 	<p>The processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into the contract;</p> <p>The processing is necessary for compliance with a legal obligation to which we are subject;</p> <p>The processing is necessary for the purposes of the legitimate interests pursued by us or a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data;</p>
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<p>c) Transaction data arising from the use of Rooster Cards associated with the Parent Account</p> <p>d) You may choose to provide us with additional personal data which includes:</p> <ul style="list-style-type: none">● Profile photos● Child's Email Address● Child's login details● Images you choose to upload to Goals or Jobs <p>e) You may choose to opt-in to receiving non-service related messages such as our getting started tips, updates on family activity, and newsletter (which can be opted out from at any time from your email preferences within the app or in the unsubscribe link).</p>	<p>support within your family account.</p> <ul style="list-style-type: none">● To help gain a better understanding of the support issue and troubleshoot the issue with you or provide technical details for bug fixes with our engineers.● To send you service related RoosterMoney message (such as those related to transactions, your account, security, or product changes)● To provide you communications you opt-in to such as updates on your family's activity within the account or suggestions to you and other users	
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f) You may choose to enable Push notifications for the RoosterMoney app on your device which will send reminders and updates, such as when allowance is delivered.

g) When you subscribe to our website services, email notifications and/or newsletters, we collect your email address. We may also collect any other information that you choose to send to us.

h) When you contact us through the app, by email or from the RoosterMoney website contact form, we collect the information you submit to us.

i) We collect usage information about your and your children's interactions with RoosterMoney services (e.g. Allowances, Boosts, Removes, Jobs

of our Site and the App about features or services that may be of interest.

- To administer our Site and the App for internal operations, including data analysis, testing, research, statistical and survey purposes; to ensure that content from our site is presented in the most effective manner for you and for your device/computer.
- To understand the interaction within our services which helps us to continually improve our services and communications and enhance our

<p>and Goals being saved for).</p> <p>j) We track visits to our website (e.g. where you came from, length of visit and page views)</p> <p>k) We track the communications we send you and your interaction with them.</p> <p>l) We automatically collect log data and device information when you access and use RoosterMoney services. That information includes, among other things:</p> <ul style="list-style-type: none"> ● details about how you've used RoosterMoney services ● IP address ● access dates and times ● hardware and software information 	<p>customers' experience within RoosterMoney.</p> <ul style="list-style-type: none"> ● To analyse our services' performance on different devices and troubleshoot any issues or bugs. ● To help improve our Marketing by measuring and understanding the effectiveness of our advertising. ● To ensure you are not targeted with RoosterMoney advertising as an existing user. ● To understand anonymous usage trends which may be used for internal business purposes or marketing /press purposes or its 	
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<ul style="list-style-type: none">• device information <p>m) We use cookies and other similar technologies on our website that may collect some personal data. You can learn more about how we use cookies and how to disable them in section 4.</p>	<p>publication in the press.</p> <ul style="list-style-type: none">• To share service-related messages, such as those related to transactions, your account, security, or product changes.• To provide customer support. <p>To disclose to selected third parties:</p> <ul style="list-style-type: none">• to make and receive payments to and from you as required under the Service Terms;• to open and maintain the Parent Account, provide Rooster Cards, process payment transactions made by you using the Service, answer	
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	<p>your queries and complaints;</p> <ul style="list-style-type: none">● To comply with a current judicial proceeding, a court order or legal process served on us or our Service, any request by the FCA or any other regulator who may have jurisdiction over us from time to time or for audit purposes and to meet obligations to any relevant regulatory authority or taxing authority;● To enforce this Privacy Policy or the Service Terms;● to a service provider to check your identity and to prevent fraud, (it will also keep a record	
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	<p>of your request and use it whenever anyone applies to be authenticated in your name);</p> <ul style="list-style-type: none">● to our principal, agents and subcontractors, for the purpose of operating the Service and obtaining the payment of any amount owed by you;● for a business deal (or negotiation of a business deal) involving sale or transfer of all or a part of our business or assets (business deals may include, for example, any merger, financing, acquisition, divestiture or	
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	<p>dissolution transaction or proceeding).</p> <p>If another company acquires our company, business or assets, that company will possess the personal data collected by us and will assume the rights and obligations regarding your personal data as described in this Policy.</p>	

15. Annex B

Your rights and how to exercise them	Exception
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Right of Access: To obtain from us confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data and the following information:

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular, recipients in third countries or international organisations;
- d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing
- f) the right to lodge a complaint with a supervisory authority

g) where the personal data are not collected from the data subject, any available information as to their source;

h) the existence of automated decision-making, including profiling, referred to in Article 22(1) of the GDPR and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

How to exercise:

This Privacy Policy provides confirmation of the details required in relation to your right of access.

Under the DPA, you have a right to access certain personal records that RoosterMoney holds about you. Any access request may be subject to a fee to meet RoosterMoney's costs (as the case may be) in providing you with details of the information they hold about you if the request is unfounded or excessive.

You can exercise the right at any time by contacting RoosterMoney at privacy@roostermoney.com.

Right to rectification: to obtain from us without undue delay the rectification of inaccurate personal data concerning you.

We must communicate to each recipient to whom the rectified personal data have been disclosed, unless this proves impossible or involves disproportionate effort.

We shall inform the data subject about those recipients if the data subject requests it.

You can exercise the right at any time by contacting RoosterMoney at

privacy@roostermoney.com.

Right to erasure: to obtain from us the erasure of personal data concerning you without undue delay where:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) you object to the processing based on legitimate interest where there are no overriding legitimate grounds for the processing;
- c) the personal data have been unlawfully processed;
- d) the personal data have to be erased for compliance with a legal obligation to which we are subject.

We must communicate to each recipient to whom the erased personal data have been disclosed, unless this proves impossible or involves disproportionate effort.

We shall inform the data subject about those recipients if the data subject requests it.

You can exercise the right at any time by contacting RoosterMoney at privacy@roostermoney.com.

Processing is necessary for:

- a) compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in us;
- or
- b) the establishment, exercise or defence of legal claims.

Right to request the restriction of

processing concerning you: to obtain

from us restriction of processing where:

- a) the accuracy of the personal data is contested by you, for a period enabling us to verify the accuracy of the personal data;
- b) the processing is unlawful and you oppose the erasure of the personal data and request the restriction of its use instead;
- c) we no longer need the personal data for the purposes of the processing, but it is required by you for the establishment, exercise or defence of legal claims;
- d) you object to the processing based on legitimate interest pending the verification whether our legitimate grounds override yours.

We must communicate to each recipient to whom the erased personal data have been disclosed, unless this proves impossible or involves disproportionate effort.

We shall inform the data subject about those recipients if the data subject requests it.

Where processing has been restricted under this right, such personal data shall, with the exception of storage, only be processed:

- a) with your consent; or
- b) for the establishment, exercise or defence of legal claims; or
- c) for the protection of the rights of another natural or legal person; or
- d) for reasons of important public interest of the Union or of a Member State.

<p>You can exercise the right at any time by contacting RoosterMoney at privacy@roostermoney.com.</p>	
<p>The right to data portability: to receive the personal data concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from us, where:</p> <ul style="list-style-type: none">a) the processing is based on consent or is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract; andb) the processing is carried out by automated means. <p>You have the right to have the personal data transmitted directly from us to another controller, where technically feasible.</p> <p>The exercise of the right referred to in paragraph 1 of this Article shall be without prejudice to the right to erasure.</p>	<p>That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.</p>

<p>You can exercise the right at any time by contacting RoosterMoney at privacy@roostermoney.com.</p>	
<p>The right to object to processing: to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on processing necessary for the purposes of the legitimate interests pursued by us or a third party (except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data), including profiling.</p> <p>You can exercise the right at any time by contacting RoosterMoney at privacy@roostermoney.com.</p>	<p>Where:</p> <ul style="list-style-type: none">a) we demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject; orb) for the establishment, exercise or defence of legal claims.

The right to ask us not to process your personal data for direct marketing purposes:

to object at any time to processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing.

You have the right to ask us not to process your personal data for marketing purposes. We will inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by using the unsubscribe link in RoosterMoney communications or by updating your email preferences in your Account Settings.

You can exercise the right at any time by contacting RoosterMoney at privacy@roostermoney.com

The right not to be subject to automated individual decision-making, including profiling: to not be subject to

a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

You can exercise the right at any time by contacting RoosterMoney at privacy@roostermoney.com

If the decision:

a) is necessary for entering into, or performance of, a contract between you and us;

b) is authorised by Union or Member State law to which we are subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or
c) is based on the data subject's explicit consent.

In the cases referred to in points (a) and (c) we shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on our part, to express his or her point of view and to contest the decision.