

## PRIVACY POLICY

This Privacy Policy is maintained by **Pitcrew AI Pty Ltd ABN 82 669 390 274** (“we”, “us” and “our”) and relates to the collection and use of personal information that you provide to us or that we collect from or about you (including via access to any system maintained by us or your conduct on any website maintained by us or through third parties). We acknowledge the importance of your privacy and are committed to protecting your personal information and adhering to the Australian Privacy Principle’s (“APP’s”) and the requirements of the Privacy Act 1988, (“the Act”).

This Policy sets out our approach in dealing with your personal information, including without limitation the collection, use, storage, access to and dissemination of such information. We undertake to treat all client and other personal information in our possession in accordance with the requirements of the Act.

By “personal information” we mean information or an opinion about an identified individual, or about an individual reasonably identifiable from the information and includes sensitive information.

By accessing our website or a system or database maintained by us or otherwise transacting with us you agree to and acknowledge the content of this Privacy Policy. This Policy is in addition to any terms and conditions or other agreement applicable to our dealings with you.

We reserve the right, at our discretion, to vary, modify or remove portions of the Privacy Policy from time to time. You should review this Policy periodically so that you are updated on any variations. We welcome your feedback and encourage you to make contact with us with any comments you may have.

### Collection of your information

Personal information we may collect includes date of birth, postal and email addresses, phone numbers, credit or debit card details and, where necessary, government identifiers such as your tax file number, ABN or registered business names.

We collect personal information directly from you, such as when you meet with us, talk to us, complete and submit application forms, and information sheets, via our website or when you give your consent to collect information from third parties.

Personal information may be provided by and obtained from employers, government agencies and websites. The privacy of any personal information collected in this manner will be treated in accordance with the APP’s.

Subject to the preceding paragraph, where it is reasonable and practical to do so we will only collect personal information about you from you. You have no obligation to provide any information requested by us. However, if you choose to withhold personal information and sensitive information from us it may prevent us from being able to provide you with the services that you have requested.

### Provision of personal information about another person

You should only provide us with the personal information about yourself. You should not provide us with personal information of another person unless you have that person's express authority and consent to do so. Should you disclose another individual's personal information to us, you should take reasonable steps to inform them of the existence of and the matters set out in this Privacy Policy. If you provide us with the personal information of another person you acknowledge and agree that you have obtained the authority of that person and notified that person of this Privacy Policy. We will rely on that acknowledgement.

### **Use and disclosure of personal information**

Subject to the particular restrictions on sensitive information, we may disclose your personal information to:

1. any person you consent to receive your information;
2. your employer or prospective employer;
3. regulatory bodies related to employee claims;
4. our contractors or the contractors of your employer or prospective employer engaging our services to you;
5. anyone to whom we are required by law to disclose your personal information.

Your personal information will be collected by us to conduct our business, to provide our services to you, including purposes necessary and incidental to the provision of services to you, or any purposes that you may reasonably expect, for any other purpose authorised by law or required to comply with our legal obligations, or for any other purposes disclosed to or authorised by you.

We will only disclose personal information for the purpose it was collected unless you have consented, or you would reasonably expect such use or disclosure, or the use is for direct marketing where we expect the information may be of interest to you.

We will provide personal information to third parties where we are required to by law, where it is reasonable for us to do so as part of providing services to you, where your authorised advisors request it or where you have expressly asked us to do so. Your personal information will be held for as long as is required to fulfill the purposes for which it was collected or as required by law and we will take reasonable steps to destroy or de-identify any personal information about you after this period. Where a period of time is not specified regarding the expiry date of the personal information provided, we will use our discretion to determine the expiry date.

Personal information is held in our Xero Accounting Data Base and on our internal servers. Personal information will not be sold by us.

### **Website collection of personal information**

We may record your personal information provided to us by you on our website as well as your IP address and details of your access to our sites, we may place cookies on your computer to enable your web browser to search and find us efficiently. We use cookies to monitor the traffic to the various pages on our website, for statistical and website improvement purposes only. This information is anonymous and will not enable you to be identified. You are able to disable cookies and applets via your computer's web browser. However, this may restrict access to some web pages and services within our website.

Our website may contain links to third parties' websites, including sites maintained by related entities. Those other websites are not subject to this Privacy Policy and are not governed, managed or controlled by us. You should familiarise yourself and ensure you are comfortable with any particular privacy policies and other terms governing the use of those websites prior to such use.

### **Data security of personal information**

We will take reasonable steps to protect the personal information we hold from misuse and loss and from unauthorised access, modification or disclosure. Our staff are required to adhere to and comply with our Privacy Policy. We use a range of physical and electronic procedures to ensure that privacy of personal information is safeguarded, and we periodically review and update our security measures in light of current technologies. We note that the internet is not secure and we cannot guarantee the security of any information sent to us via the internet, nor can we guarantee that our data storage measures are absolutely secure. We have appointed a Privacy Officer who is responsible for the application of this Privacy Policy and to ensure that our practices, procedures and systems are applied in an open and transparent manner. The Privacy Officer can be contacted at: [support@pitcrew.ai](mailto:support@pitcrew.ai)

### **Notifiable Data Breaches**

Despite our security of your personal and sensitive information, data breaches can sometimes occur. Under the Act, an Eligible Data Breach is where there is an unauthorised access or disclosure of, personal information, or loss of personal information that has the potential to cause serious harm to the individual that the data pertains to, and we have not been able to prevent the likely risk of serious harm with remedial action. If we have reasonable grounds to believe that an Eligible Data Breach has occurred, we will notify you and the Office of the Australian Information Commissioner.

### **Commonwealth Government identifiers**

We will not use Commonwealth government identifiers (Identifiers) as an identifier of individuals. Identifiers will only be used or disclosed in the circumstances permitted by the Act.

### **Access to and correction of personal information**

You may request access to your personal information by contacting the Privacy Officer. Photo identification will be required and an access fee may be payable. Except where some legal restrictions might apply you will be provided access to any personal information we have collected or hold about you. An explanation will be given by us if we refuse to allow you access to your personal information held by us. We will deal with all requests to access to personal information as quickly as possible but may charge you a fee where access is provided.

We will endeavour to take reasonable steps to keep information about you accurate and up to date. If at any time you discover that information held about you is incorrect, you may contact us to request a correction and we will update that information.

### **Sensitive Information**

During the course of business we may be required to collect Sensitive Information about individuals, which may include information about your health (including genetic information), racial or ethnic origin,

political opinions or memberships, religious or philosophical affiliations or criminal record. Collection of any Sensitive Information will be done in accordance with the APP's and the Privacy Act.

We will only disclose Sensitive Information that we may collect or hold about you for the purposes for which it was collected, or for directly related purposes you would reasonably expect us to use it for, or if you have expressly consented to that disclosure, or if we are otherwise authorised or compelled by law or a court order to disclose that Sensitive Information.

### **Anonymity and Complaints**

You are entitled to deal with us anonymously or through a pseudonym. Any request or complaint that you supply to us anonymously or through a pseudonym will be handled as best we can in the circumstances, however, without providing your identity, we may be limited in the action that we can take in relation to your enquiry or complaint. Subject to our legal obligations, the use of a pseudonym or anonymity, when dealing with us, may also affect our ability to properly provide you with our goods or services, however these circumstances will be handled as best as we can.

Should you have any complaints about our treatment of your personal information, please direct this by email to our Privacy Officer on [support@pitcrew.ai](mailto:support@pitcrew.ai). We will treat your complaint seriously and will investigate any breach of which we become aware – including how it occurred and how best to prevent such a breach occurring again. If you believe that we have not adequately addressed your complaint, you may complain to the Office of the Australian Information Commissioner.

### **Transborder data flows**

There may be other occasions when personal information is transferred outside of Australia within our network, or such as where we engage a third party to provide services or an element of the services to you. Generally, this will occur in the provision of services to you and the transfer of this information outside of Australia will have been disclosed to, and authorised by, you as part of the terms of our engagement. When transferring personal information outside Australia within our network, we will comply with the requirements of the Act that relate to transborder data flows. Where the international transfer of personal information is to countries whose privacy laws may be considered not to provide the same level of protection as Australia, our commitment to safeguard your privacy will not change and remains subject to existing obligations and this Policy.

As part of provision of the services to you we may store your personal information using online or cloud software. The personal information that you provide to us may be transferred to the servers of our software providers as a function of transmission across the internet. By providing your personal information you are consenting to that personal information being transferred to and stored on the servers as set out in this Privacy Policy. However, as the third parties who host our servers do not control, and are not permitted to access or use your personal information (except for the limited purpose of storing the information), we do not “disclose” personal information to those server hosts, whether or not they are located overseas.

Notwithstanding the above, for the purpose of transparency we advise that our internal servers are located in New South Wales, Australia. However, this location may change without prior notice to you. Your personal information may be routed through, and stored on, those servers. If the location of those

servers changes in the future, we will update this Privacy Policy. We recommend that you familiarise yourself with our privacy policy regularly and any related privacy policy of our software providers.

We will use reasonable endeavours to ensure that our server hosts do not have access to, and use the necessary level of protection to safeguard, your personal information and otherwise comply with the APPs. If you do not want your personal information to be transferred to a server in the location listed in the previous paragraph or to any other international locations, you should not provide us with your personal information or use our services.

### **Your credit information and credit eligibility information**

The Privacy Act 1988 classifies credit information as, certain information relating to goods and services supplied on terms which allow payment to be deferred for a period of time more than seven days.

If we provide you (or an entity related to you) with credit, we may also collect and hold credit information and credit eligibility information about you. Without limitation, this may include credit reports, identification information, consumer credit liability information (e.g. information relating to amounts payable to us and the terms of the relevant credit), as well as information relating to payments made and default payment information.

### **Updating privacy policy**

We may review our Privacy Policy from time to time to ensure that it is in line with best practice and remains current with any legislative requirements. Any changes to our Privacy Policy will be incorporated into a new version of this Policy stating the date from which it will operate and can be obtained on our website or by telephoning our office. Our business will be governed by our most recent and up-to-date policy.

### **Contacting us**

If you have any questions about this Privacy Policy and would like further information, please contact our Privacy Officer on: [support@pitcrew.ai](mailto:support@pitcrew.ai) or by calling our office during business hours.