

Privacy Policy

Peclet Technology Pty Ltd · ABN 59 604 366 583 · Version 2.0 · 10 September 2024

1. About this policy

This policy explains how Peclet Technology Pty Ltd ("Peclet", "we", "us") collects, holds, uses, discloses and protects personal information. It applies to our websites (www.peclet.com.au, data.peclet.com.au, circulareconomy.peclet.com.au), our data platforms and our professional services. Peclet handles personal information in accordance with the Australian Privacy Principles (APPs) under the Privacy Act 1988 (Cth) and, where applicable, the Notifiable Data Breaches (NDB) scheme under Part IIIC of that Act.

Peclet acts in two capacities. For personal information Peclet collects about its own website visitors, customers and prospects, Peclet is responsible for that information and this policy applies in full. For personal information Peclet accesses or processes on behalf of a client under our professional services, the client is responsible for the handling of that information and Peclet's role is governed by the agreement with that client; this policy does not override those arrangements.

2. What personal information we collect

We collect only the personal information reasonably necessary for our functions. This typically includes your name, business title, business contact details (email, phone, address) and information about your interactions with us (correspondence, meeting notes, service requests, feedback). We may collect additional information you choose to provide. We do not actively seek to collect sensitive information (as defined in the Privacy Act); where we need to, we will do so only with your consent.

3. How we collect your personal information

We collect personal information directly from you ; when you contact us, request a service, attend a meeting or event, or interact with our websites or applications. Where it is lawful and practicable to deal with you anonymously or under a pseudonym, you may do so. If you choose not to identify yourself we may be unable to provide the service you have requested, and we will tell you if that is the case.

We may also receive personal information from third parties (for example, a referrer) where there is a lawful basis to do so. If we receive personal information that we did not solicit, we will determine whether we could have collected it under APP 3 and, if not, destroy or de-identify it as soon as practicable.

4. How we use and disclose personal information

We use personal information only for the purpose for which it was collected or a related purpose you would reasonably expect, or where you have given your consent. Typical purposes include responding to your enquiries, providing and improving our services, administering our contracts, and complying with our legal obligations.

We may disclose personal information to: our personnel who need it to perform their duties; our service providers under confidentiality obligations; our clients where you are a representative of a client; and others where required or authorised by law.

5. Direct marketing

We may use your business contact details to send you information about our services. Every marketing message will include a clear opt-out, and you can also opt out at any time by emailing privacy@peclet.com.au. We will act on opt-out requests promptly and will not use the opted-out details for direct marketing again.

6. Overseas disclosure

Peclet is based in Australia and our personnel are located in Australia. Personal information we collect is held in Australia, including on Australian-hosted cloud infrastructure (AWS Sydney). We have no routine overseas disclosure of personal information. If we need to disclose personal information to an overseas recipient (for example, support from an overseas vendor), we will take reasonable steps to ensure the recipient handles the information in a way consistent with the APPs, unless an exception under APP 8.2 applies, and we will update this policy to identify the country where the recipient is likely to be located.

7. Data quality

We take reasonable steps to ensure the personal information we collect, use or disclose is accurate, up to date, complete and relevant for its purpose. Please let us know if your details change.

8. Security, retention and destruction

We take reasonable steps to protect personal information from misuse, interference, loss and unauthorised access, modification or disclosure. These steps are described in our Security Assurance Plan, available on request. We retain personal information only for as long as we need it, or as required by law, and then destroy or de-identify it.

9. Notifiable Data Breaches

If a data breach involving personal information is likely to result in serious harm to affected individuals, Peclet will notify those individuals and the Office of the Australian Information Commissioner (OAIC) as required by Part IIIC of the Privacy Act.

10. Access and correction

You may request access to the personal information we hold about you, or ask us to correct it, by emailing privacy@peclet.com.au. We will respond within 30 days. We will not charge for an access or correction request. We may refuse access only in the limited circumstances set out in the Privacy Act (for example, where providing access would unreasonably impact another person's privacy); if we refuse, we will tell you the reasons in writing and explain how to complain. If we refuse to correct information, you may ask us to associate a statement with the record noting that you consider it inaccurate, out of date, incomplete, irrelevant or misleading, and we will take reasonable steps to do so.

11. Complaints

If you have a privacy concern, please contact us at privacy@peclet.com.au or at Level 3, 180 George Street, Sydney NSW 2000, marked "Privacy Officer". We will acknowledge your complaint within five business days and respond substantively within 30 days.

If you are not satisfied with our response, you may complain to the Office of the Australian Information Commissioner (OAIC):

- website: oaic.gov.au
- phone: 1300 363 992
- post: GPO Box 5218, Sydney NSW 2001

12. Websites, cookies and location

When you visit our websites or applications we may collect technical information (IP address, device type, operating system, browser type and the pages you view) to understand how our sites are used and to improve them. We may use cookies for the same purpose; you can disable cookies in your browser settings, although this may limit site functionality. Where you have granted permission, we may use location data to display location-

specific content; we do not share your location with other users or partners. Links from our sites to third-party websites are provided for convenience; we are not responsible for the privacy practices of those sites.

13. Changes to this policy

We may update this policy from time to time to reflect changes in our practices or in the law. The current version is always available at www.peclet.com.au/privacy.pdf. Material changes will be noted at the top of the policy.

Contact

Policy owner: Alex Sales, Director

Email: privacy@peclet.com.au

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www.peclet.com.au