

ACCESSII GROUP PTY LTD

PRIVACY POLICY

Accessii Group Pty Ltd - Privacy Policy

1. Introduction

Accessii Group Pty Ltd has created a number of Online Platforms to enable its clients to manage and control their businesses more efficiently and effectively. The Platforms are applications designed for various online activities including, but not limited to, the lodgement, control and management of Online Credit Applications including trade credit applications (Access Credible Platform), the lodgement of transactions including registration, modification and discharge of Security Interests on the Australian Personal Property Securities Register (SiiP PPSR Platform) and the visualisation, control and management of debtors for a business (Access Insight Platform).

Accessii Group has adopted this Policy in accordance with the privacy law. This Policy outlines how Accessii Group deals with Personal Information, which it collects in conjunction with the Platforms. Accessii Group may also collect information about Individuals who do not use the Platforms. Capitalised words in this Policy are defined terms. Defined terms are explained at the end of this Policy.

2. Collecting information directly from people

Accessii Group collects Personal Information directly when:

- an Individual contacts Accessii Group by telephone, fax, email or another form of communication;
- an Individual gives Accessii Group his or her information in person on a paper form;
- an Individual sends the Accessii Group a message through SMS or a third party app;
- an Individual registers or subscribes for an account;
- the Platforms automatically captures Personal Information in content Individuals post on the Platforms;
- our server and analytics service logs details about website visits;
- location services, when switched on, capture Individuals' locations;
- our website places or retrieves a cookie on Individuals' devices;
- our website or server stores visitors' IP addresses.

3. Collecting information from third parties

Accessii Group collects Personal Information about Individuals from third parties when:

- third parties give Accessii Group access to files containing Personal Information;
- we conduct research on Individuals, including potential customers; and
- we retrieve registration data from the PPSR or from another government agency.

4. Organisations using the Platforms

Accessii Group provides the Platforms to Organisations, which use them as business and information management tools and for conducting transactions on behalf of their own customers or clients. Both Accessii Group and the Organisations may collect Personal Information from Individuals, including when:

- Organisations collect information directly from Individuals using the Platforms;
- Organisations give Accessii Group access to their files containing Personal Information; and
- Organisations enter or process information (such as notes or files) about Individuals using the Platforms.

5. Types of Information that Accessii Group collects and holds

Using processes described in this Policy, Accessii Group collects the following categories of Personal Information about Individuals:

- **(Content)** whatever Personal Information is included in content Individuals enter using the Platforms;
- **(Identity Information)** name, signature, date of birth, nationality, license & registration details, bank account details, family details, employment details, educational qualifications, usernames;
- **(Contact Information)** email address, social media profiles, telephone & fax number, third-party usernames, residential, Accessii Group and postal addresses;

ACCESSII GROUP PTY LTD

PRIVACY POLICY

- **(Internet Data)** webpage views, IP address, referring web site addresses, location, browser type, operating system, domain name, access times and other data typically collected by analytics services like Google Analytics; and
- **(PPSR information)** information about and recorded in connection with PPSR security interests.

6. How Accessii Group stores Personal Information

Accessii Group holds and stores Personal Information using:

- **(Storage Services)** third party data storage services, including applications and software;
- **(Accessii Group Devices)** devices operated by employees of Accessii Group's business; and
- **(Paper Files)** printed paper and third party archival storage services.

7. Security

Accessii Group will take reasonable precautions to protect Personal Information from unauthorised access. This includes measures to secure the Accessii Group's physical facilities and electronic networks.

Accessii Group secures Personal Information that it collects with credentials, passwords, pins, encryption, session expiry, firewalls, SSL network encryption, and through the use of reputable vendors.

For more information on security, please contact Accessii Group using the details in the "contacting us" below.

8. Deletion procedures

Accessii Group deletes Personal Information when users close their account with us.

9. Why data is held, used and disclosed

Accessii Group's handling of Personal Information includes holding, using and sometimes sharing the Personal Information so that we can:

- provide functionality within the Platforms;
- provide notifications and support;
- offer marketing and promotions, competitions, surveys and questionnaires;
- transact with Individuals and process payments;
- assess and improve the Platforms;
- provide secure access to the Platforms.

For more information on when Accessii Group shares Personal Information, see below.

10. Handling of data

Some collection, holding, use and disclosure of information happens simply by virtue of Individuals and Organisations using the Platforms.

The purpose of the Platforms is to allow Accessii Group, Organisations and Individuals to enter, manage and communicate information, including Personal Information, relating to the Australian Personal Property Securities Register and the registration, modification and discharge of Security Interests.

11. Disclosing Personal Information

Accessii Group shares Personal Information with others in the following ways:

- facilitating the sharing of information about sales, inquiries and payments.
- processing transactions lodged by a user on the Platforms, including submission of Personal Information to the PPSR.

12. Service providers can access personal information

When Accessii Group uses the services of companies that we work with to provide the Platforms, they may get access to the Accessii Group's data, including Personal Information. Such third party services may include:

ACCESSII GROUP PTY LTD

PRIVACY POLICY

- **(Government Agencies)** Government agencies that administer the PPSR, the Australian Business Register or the registers of Australian companies, business names and organisations;
- **(Hosting)** Cloud and web hosting service providers;
- **(SaaS)** providers of software as a service;
- **(Support)** providers of IT support services, web and software development;
- **(Data analytics)** Google Analytics (see [<http://www.google.com/intl/en/policies/privacy/>])(<http://www.google.com/intl/en/policies/privacy/>);
- **(Online payment)** providers of online payment systems; and
- **(Apple device functionality providers)** Apple location services, Siri dictation, Apple Maps, Apple Notifications (see [<http://www.apple.com/au/privacy/>])(<http://www.apple.com/au/privacy/>)).

Accessii Group will only share Personal Information with these third parties to the extent reasonably necessary to perform their functions.

These third parties may have their own privacy and security policies. For more information about this, please contact Accessii Group using the details listed in the "contacting us" section below.

For information on disclosures to overseas recipients, see below.

13. Disclosing information overseas

The Accessii Group may store or process some Personal Information overseas. Individuals may not have the same rights relating to their information when it is overseas as they would under Australian privacy law.

By providing Accessii Group with Personal Information, Individuals consent to the transfer of their Personal Information to overseas recipients as contemplated by this privacy policy.

If Individuals consent to such transfer, Accessii Group will not be accountable for overseas recipients' handling of their Personal Information.

14. Contacting us

Individuals may edit content and account details within the Platforms.

However, Individuals can also contact Accessii Group using the details below if they want to access, correct or delete Personal Information or lodge a complaint.

Privacy Officer: accounts@accessppsr.com.au

Accessii Group reserves the right to refuse access or correction where there are reasonable grounds for doing so, for example if providing access would be unlawful or would compromise the privacy of another person.

15. Complaints process

If Individuals have a complaint about privacy, they can contact Accessii Group using the details listed above.

Accessii Group will respond to complaints in writing within a reasonable period (usually 10 business days from the day we receive an email).

Accessii Group will try to work with Individuals to resolve complaints entirely within 20 business days, although that period may be longer if it is reasonable to take longer given the nature of the complaint.

If Individuals are unsatisfied with our response, they may refer the complaint to the Office of the Australian Information Commissioner (<http://www.oaic.gov.au/>).

16. Amendment

Accessii Group may amend the Privacy Policy at its sole discretion. Individuals that continue to use the Platforms after receiving notice from Accessii Group of such an amendment, agree to be bound by the Privacy Policy as amended.

17. Definitions

Affiliate means a third party referrer appointed by Accessii Group in respect of the Platforms.

Individual means a natural person.

Organisation means third party Organisations using the Platforms including Affiliates.

Personal Information means information about an Individual whose identity is apparent, or can reasonably be ascertained, from that information. This includes information like names, telephone numbers, email addresses and physical addresses.



ACCESSII GROUP PTY LTD

PRIVACY POLICY

Platform means the software platform known as “the Platforms”.

Policy means this document, drafted in accordance with the *Privacy Act 1988* (Cth).

PPSR means the Australian Personal Property Securities Register.

Accessii Group, we, us and our means the Platforms PPSR Pty Ltd ACN 628 252 880.