

PRIVACY POLICY - OCCAMISE PTY LTD

Last Updated: 15 August 2025

This Privacy Policy sets out our commitment to protecting the privacy of personal information provided to us, or otherwise collected by us, offline or online, including through this website (**Site**). In this Privacy Policy **we, us or our** means Occamise Pty Ltd (ACN 670 808 278) and our related bodies corporate. When we collect, store and use your personal information, we do so in accordance with the rules set down in the Australian *Privacy Act 1988* (Cth), the UK Data Protection Act and the General Data Protection Regulation (Regulation (EU) 2016/679).

We utilise third-party service providers located both in Australia and internationally, including the United States, for certain processing activities. Details of these third parties and their locations are outlined in the “Disclosure of personal information to third parties” section.

This Privacy Policy form part of the terms and conditions of our agreements with you (if any). While your privacy is very important to us, nothing in this privacy policy constitutes a voluntary opt-in to any privacy laws, anywhere in the world, which we are not statutorily bound to comply with.

We collect Personal Information in conjunction with our cloud-based services in a number of ways which are outlined below.

Personal information

Please note, that when our clients collect information through the use of our Services, it may be accessible to us because we host our clients’ data. However, it is not our practice to access such information or to seek to identify any individuals with it.

The types of personal information or personal data we may collect about you may include:

- your name;
- your contact details, including email address and/or telephone number;
- your age and/or date of birth;
- your demographic information, such as postcode;
- your preferences and/or opinions;
- details of products and services we have provided to you and/or that you have enquired about, and our response to you;
- your browser session and geo-location data, device and network information, statistics on page views and sessions, acquisition sources, search queries and/or browsing behaviour;
- information about your access and use of our Site, including through the use of Internet cookies, your communications with our Site, the type of browser you are using, the type of operating system you are using and the domain name of your Internet service provider;
- additional personal information that you provide to us, directly or indirectly, through your use of our Site, associated applications, associated social media platforms and/or accounts from which you permit us to collect information; and

- any other personal information requested by us and/or provided by you or a third party.

We may collect these types of personal information directly from you or from third parties.

Collection and use of personal information

We may collect, hold, use and disclose personal information for the following purposes:

- to enable you to access and use our Site, services, associated applications and associated social media platforms;
- to contact and communicate with you;
- for internal record keeping and administrative purposes;
- for analytics, market research and business development, including to operate and improve our Site, associated applications and associated social media platforms;
- to comply with our legal obligations and resolve any disputes that we may have; and
- to consider your employment application.

Retention periods vary depending on the type of data collected. Conversation transcripts are retained for the duration of the customer contract unless deleted earlier by the client. Voice recordings may be stored according to configurable retention rules. System logs are stored for a maximum of 7 days. LLM inputs and outputs are retained by OpenAI for 30 days for compliance purposes only.

Legal bases for processing (for UK and EU users):

If you are an individual in the UK or European Economic Area (**EEA**), we collect and process information about you only where we have legal bases for doing so under applicable United Kingdom or European Union laws. The legal bases depend on the services you use and how you use them. This means we collect and use your information only where:

- it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract;
- it satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development, to market and promote our services and to protect our legal rights and interests;
- you give us consent to do so for a specific purpose (for example we might ask for consent in order to provide you with our services, provide customer support and personalised features); or
- we need to process your data to comply with a legal obligation.

If you have consented to our use of information about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your information because we or a third party (e.g. your employer) have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer using our services.

Disclosure of personal information to third parties

We allow our clients access to Personal Information and Personal Data that they have stored through our services. Access to Personal Information and Personal Data stored by our customers through the services

is only available to nominated users of that customer. A representative of the customer will be responsible for creating users and applying the security access profile. Passwords are encrypted when stored in our database.

We may disclose personal information to:

- third party service providers for the purpose of enabling them to provide their services, including (without limitation) IT service providers, data storage, email delivery, web-hosting and server providers, debt collectors, maintenance or problem-solving providers, professional advisors and payment systems operators;
- Twilio (US Based), which hosts the SMS and phone service through which we send communications to our clients and on behalf of our clients (see <https://www.twilio.com/legal/privacy>);
- Deepgram (US Based), which we use to process voice-to-text transcription for recorded or live voice inputs (see <https://deepgram.com/privacy>).
- Amazon Web Services (AWS) as they host our servers, databases and other related system functions; AWS (Sydney, Australia) is used for primary hosting, databases, backups, and system logging.
- OpenAI (US Based) to process Chat Completions for conversations between our services and our Client and between our Service and the customers of our Client;
- 11Labs (US Based), which may be used for voice synthesis, retains the LLM output text for up to 3 years (see <https://elevenlabs.io/privacy>).
- our employees, contractors and/or related entities;
- our professional advisers such as our lawyers;
- our existing or potential agents or business partners;
- anyone to whom our business or assets (or any part of them) are, or may (in good faith) be, transferred;
- credit reporting agencies, courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services we have provided to you;
- courts, tribunals, regulatory authorities and law enforcement officers, as required by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights;
- third parties, including agents or sub-contractors, who assist us in providing information, products and services. This may include parties located, or that store data, outside of Australia including in the USA, Canada and Ireland; and
- third parties to collect and process data, such as Google Analytics or other relevant businesses. This may include parties that store data outside of Australia including in the USA, Canada and Ireland.

A summary of our key third-party service providers and their data storage locations is as follows:

- AWS – Sydney, Australia – hosting, databases, backups, logs.
- Twilio – United States – telecommunications (SIP, PSTN, SMS, WhatsApp).
- OpenAI – United States – LLM input/output processing (30-day retention).
- Deepgram – United States – voice-to-text transcription.
- 11Labs – United States – voice synthesis (optional feature, up to 3-year retention).

When we refer to 'process' in this clause and this Privacy Policy in general, we mean any operation or set of operations which is performed on personal information, whether or not by automated means, such as

collecting, recording, organising, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available personal information.

By providing us with personal information or Personal Data, you consent to the disclosure of your personal information and Personal Data to third parties who reside outside Australia and, if you are an individual located in the UK or EU, to third parties that reside outside the UK or EU.

Where the disclosure of your personal information is solely subject to Australian privacy laws (and not subject to the Data Protection Act or GDPR), you acknowledge that some third parties may not be regulated by the Privacy Act and the Australian Privacy Principles in the Privacy Act and if any such third party engages in any act or practice that contravenes the Australian Privacy Principles, it would not be accountable under the Privacy Act and you will not be able to seek redress under the Privacy Act.

Where the disclosure of your personal information is subject to the Data Protection Act or GDPR, you acknowledge that there are risks if the third party outside the UK or EU engages in any act or practice that would contravene those laws and where there is no adequacy decision in place or appropriate safeguards with that third party. Our primary hosting environment is located in AWS Sydney, Australia. Certain processing activities — such as telecommunications via Twilio, LLM processing by OpenAI, transcription by Deepgram, and voice synthesis by 11Labs — occur in the United States. Where required under the GDPR or UK DPA, we implement appropriate safeguards, such as standard contractual clauses, to protect personal data transferred internationally.

Third-Party Integrations and Data Sharing

At Occamise, we provide the functionality for users to connect and integrate with various third-party services. By enabling these integrations, you are authorising us to access and transfer data between Occamise and the integrated third-party services as necessary to facilitate the functionality of these integrations.

You are responsible for any data you transmit or manage through these integrations and must comply with the privacy policies of the respective third-party services. We encourage you to review those policies to understand how they collect, use, and share your data.

By using our integration features, you consent to Occamise accessing and transferring your data as described. You may revoke this consent at any time by disabling the integration within our platform. However, please note that revoking consent may affect your ability to use certain features of our service.

We are not responsible for the data practices of any third-party service providers. While we take reasonable measures to ensure secure transmission of your data to these services, Occamise cannot be held liable for any breaches or loss incurred once data is in their possession.

We may update, change, or discontinue integrations with third-party services at our discretion without any liability to you. We will endeavour to notify users of significant changes where practicable.

For more details on the third parties we use and their privacy practices, see the “Disclosure of personal information to third parties” section of this policy.

How we treat personal information that is also sensitive information

Sensitive information is a sub-set of personal information that is given a higher level of protection under the Australian Privacy Principles. **Sensitive information** means information relating to your racial or ethnic origin, political opinions, religion, trade union or other professional associations or memberships, philosophical beliefs, sexual orientation, sexual practices or sex life, criminal records, health information or biometric information.

Our clients have complete control over how they use our software, which means that our clients or their clients may provide information that discloses what is considered sensitive information.

While we do not actively collect sensitive information, in the event that our clients or their clients disclose sensitive information, we will keep that information secure.

Where we process sensitive information on behalf of a client, we act solely under their instructions and in accordance with our Data Processing Agreement. We do not independently determine the purposes or means of processing such information.

Sensitive information may also be used or disclosed if required or authorised by law.

Our responsibilities as a 'controller' under the Data Protection Act and GDPR

Controllers are defined by the Data Protection Act and GDPR as natural or legal persons, a public authority, agency or other body to which personal information or personal data has been disclosed, whether via a third party or not, and who determines the purposes and means of processing personal information. In certain circumstances, we are a controller under the Data Protection Act and GDPR as we collect, use and store your personal data to enable us to provide you with our goods and/or services.

As a controller, we have certain obligations under the Data Protection Act and GDPR when collecting, storing and using the personal information of individuals based in the UK or EU. If you are an individual located in the UK or EU, your personal data will:

- be processed lawfully, fairly and in a transparent manner by us;
- only be collected for the specific purposes we have identified in the 'collection and use of personal information' clause above and personal information will not be further processed in a manner that is incompatible with the purposes we have identified;
- be collected in a way that is adequate, relevant and limited to what is necessary in relation to the purpose for which the personal information is processed;
- be kept up to date, where it is possible and within our control to do so (please let us know if you would like us to correct any of your personal information);
- be kept in a form which permits us to identify you, but only for so long as necessary for the purposes for which the personal data was collected;
- be processed securely and in a way that protects against unauthorised or unlawful processing and against accidental loss, destruction or damage.

We also apply these principles to the way we collect, store and use the personal information of our Australian customers or clients.

Specifically, we have the following measures in place, in accordance with the Data Protection Act and GDPR:

- **Data protection policies:** We have internal policies in place which set out where and how we collect personal information, how it is stored and where it goes after we get it, in order to protect your personal information.
- **Right to ask us to erase your personal information:** You may ask us to erase personal information we hold about you.
- **Right to ask us to restrict data processing:** You may ask us to limit the processing of your personal information where you believe that the personal information we hold about you is wrong (to give us enough time to verify if the information needs to be changed), or where processing data is unlawful and you request us to restrict the processing of personal information rather than it being erased.
- **Maintain Records of Processing Activities**
- **Notification of data breaches:** We will comply with the Data Protection Act and GDPR in respect of any data breach.

Our responsibilities as a ‘processor’ under the Data Protection Act or GDPR

Where we are a processor, we have contracts containing certain prescribed terms in our contracts with controllers. Depending on the circumstances, we can be a controller or processor or controller and processor. In addition to:

- our contractual obligations with controllers (where we are solely a processor); and
- our legal obligations under the Data Protection Act or GDPR as a controller (where we are both a controller and processor) as a processor we also have the following responsibilities under the Data Protection Act and GDPR:
 - not to use a sub-processor without the prior written authorisation of the data controller;
 - to co-operate with the UK privacy commissioner;
 - to ensure the security of our data processing;
 - to keep records of processing activities;
 - to notify any personal data breaches to the data controller; and
 - to employ a data protection officer and appoint (in writing) a representative within the European Union if required by the Data Protection Act. (These are not required for the company at the present time).

Compliance with Australian Assistance and Access Legislation

Laws in Australia compel companies to share data with Australian intelligence agencies and law enforcement or build in data sharing mechanisms which may report directly to these agencies. While we endeavour to protect your data and our technology from vulnerabilities wherever possible, we can't break the law, nor can we inform you when we've been issued with a notice under this legislation.

By using our website or service, you expressly release and indemnify us from any liability to you which arises from sharing data or building data sharing mechanisms (including ‘*back-doors*’ and vulnerabilities)

into our technology at the direction of Australian Government and its agencies, including where those mechanisms are later exploited by a third party.

User Security

New digital threats are emerging all the time, and the online environment is more hostile than ever. To protect your data online, including any data or material transmitted by you to us, we recommend reading, implementing and observing any relevant procedures and safety tips recommended by the Department of Industry, Innovation and Science (see - <https://business.gov.au/online/cyber-security>) and the Australian Cyber Security Centre (see <https://cyber.gov.au>) from time to time.

All data is encrypted in transit using TLS 1.2+ and at rest using AES-256 encryption. Access to customer data is restricted to authorised personnel and protected via role-based access control and multi-factor authentication.

Your rights and controlling your personal information

Choice and consent: Please read this Privacy Policy carefully. By providing personal information to us, you consent to us collecting, holding, using and disclosing your personal information in accordance with this Privacy Policy. If you are under 16 years of age, you must have; and warrant to the extent permitted by law to us that you have, your parent or legal guardian's permission to access and use the Site and they (your parents or guardian) have consented to you providing us with your personal information. You do not have to provide personal information to us, however, if you do not, it may affect your use of this Site or the products and/or services offered on or through it.

Your rights under GDPR and UK DPA: If you are located in the UK or EU, you have rights including access, rectification, erasure, restriction of processing, data portability, and the right to object to processing. You also have the right to lodge a complaint with a supervisory authority.

Your rights under the Australian Privacy Act: If you are located in Australia, you have rights to access, correct, and make complaints about how we handle your personal information, as outlined in this policy.

Information from third parties: If we receive personal information about you from a third party, we will protect it as set out in this Privacy Policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

Restrict: You may choose to restrict the collection or use of your personal information. If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by contacting us using the details below. If you ask us to restrict how we process your personal information, we will let you know how the restriction affects your use of our Site or products and services.

Access and data portability: You may request details of the personal information that we hold about you. You may request a copy of the personal information we hold about you. Where possible, we will provide this information in CSV format or other easily readable machine format. You may request that we erase the

personal information we hold about you at any time. You may also request that we transfer this personal information to another third party (data portability).

Correction: If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us using the details below. We will take reasonable steps to correct any information found to be inaccurate, incomplete, misleading or out of date.

Complaints: If you believe that we have breached the Australian Privacy Principles or an article of the Data Protection Act or GDPR and wish to make a complaint, please contact us using the details below and provide us with full details of the alleged breach. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take to deal with your complaint. You also have the right to contact the Office of the Australian Information Commissioner if you wish to make a complaint.

Unsubscribe: To unsubscribe from our e-mail database or opt-out of communications (including marketing communications), please contact us using the details below or opt-out using the opt-out facilities provided in the communication.

Storage and security

We do not automatically delete specific items of personal information or personal data unless configured by the client. Clients have full control to delete their own data at any time. When a client account is deleted, we remove all associated data from our systems, including personal information or personal data collected by the client.

We are committed to ensuring that the personal information we collect is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures such as the pseudonymisation and encryption of personal information, to safeguard and secure personal information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

We cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk. Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that the personal information we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

Cookies and web beacons

We may use cookies on our Site from time to time. Cookies are text files placed in your computer's (or other device's) browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally identifiable information. However, they do allow third parties, such as Google and Facebook, to cause our advertisements to appear on your social media and online media feeds as part of our retargeting campaigns. If and when you choose to provide our Site with personal information, this information may be linked to the data stored in the cookie.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our Site. They include, for example, cookies that enable you to log into secure areas of our Site, use a shopping cart or make use of e-billing services.
- **Functionality cookies.** These are used to recognise you when you return to our Site. This enables us to personalise our content for you and remember your preferences (for example, your choice of language or region).

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie	Purpose
XSRF-TOKEN	A token used to prevent cross site request forgery. The cookie is encrypted and verified against a matching server side value.
remember_2fa_token	A token used to remember a device for 30 days so it can be excluded from two factor authentication. This cookie is optional and only applies to users who have two factor authentication enabled. The cookie is encrypted and verified against a matching server side value.
occamise_session	This cookie links a user to a collection of server side session values. Examples include user authentication, language, progress (installation progress, for example), and temporary preferences such as reporting filters. The cookie is encrypted and verified against a matching server side value.
cookies_consent	These cookies are used by our Google Analytics account to track customer traffic through the website to help us understand how our website is being used by our customers
_ga, _gid, _gat	This cookie tracks when a user has accepted that the site uses cookies preventing the popup from being displayed again during that session
(stripe.com) recent-views, color-scheme, machine_identifier, _gac, __stripe_mid, scfc,lang, __stripe_orig_props, private_machine_identifier,docs.prefs	These cookies are used by Stripe to ensure payments are secure and to prevent forgery.

(stripe.com) _ga	This cookie is used by the Stripe Google Analytics account to track customer behaviour, ensure payments are secure and prevent forgery.
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You may block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

We may use web beacons on our Site from time to time. Web beacons (also known as Clear GIFs) are small pieces of code placed on a web page to monitor the visitor's behaviour and collect data about the visitor's viewing of a web page. For example, web beacons can be used to count the users who visit a web page or to deliver a cookie to the browser of a visitor viewing that page.

The following is Google's mandatory Google Analytics clause as at June 2021. We may use Google Analytics to collect and process data. To find out how Google uses data when you use third party websites or applications, please see www.google.com/policies/privacy/partners/ or any other URL Google may use from time to time.

Links to other websites

Our Site may contain links to other websites. We do not have any control over those websites and we are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Privacy Policy.

Interacting with us

If you contact us with a general question, we may interact with you anonymously or through the use of pseudonyms.

However, you are required to provide true and accurate details when requesting support services. You agree you will provide accurate information if so required. **Amendments**

We may, at any time and at our discretion, vary this Privacy Policy. We will notify you if we amend this Privacy Policy, by contacting you through the contact details you have provided to us. Any amended Privacy Policy is effective once we notify you of the change. Your continued use after you receive the notification indicates your consent to be bound by the amended Privacy Policy.

For any questions or notices, please contact our Privacy Officer at:

Occamise Pty Ltd (ACN 670 808 278)

PO BOX 1333 North Lakes QLD 4509

Email: info@occamise.com

For further information about privacy in general, please refer to the Office of the Australian Information Commissioner's website located at <http://www.oaic.gov.au>.