

Zudello Privacy Policy

Introduction

At Zudello, we care about the privacy of your data and are committed to protecting it. This Privacy Policy explains what information we collect about you and why, what we do with that information, and how we handle that information.

This notice applies across all websites that we own and operate and all services we provide, including our online platform, mobile app, and any other services we may offer (for example, events or training). For the purpose of this notice, we'll just call them our 'services'.

When we say 'personal data' we mean identifiable information about you - such as your name, email, address, telephone number, support queries, community comments and so on. If you can't be identified (for example, when personal data has been aggregated and anonymised) then this notice doesn't apply. Check out our Terms & Conditions, Security Summary and our Data Processing Agreement for more information on how we treat your data.

Sometimes this Policy will need to be updated. Any changes will be effective immediately on the posting of the revised Policy on this Site. Please check this Site regularly to see if there have been any changes. Depending on the nature of the change, we may also announce it by email (if we have your email address). You can also obtain a copy of the most current version of this Policy by either emailing or writing to the Privacy Officer using the contact details set out below.

By continuing to use our product, services or Site, or otherwise continuing to deal with us, you accept these changes and this Policy as it applies from time to time.

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Who are 'we'?

When we refer to 'we' (or 'our' or 'us'), that means Zudello Pty Ltd. Our headquarters is at Level 12, 410 Ann Street, Brisbane, QLD 4000 Australia.

We are a provider of finance operations automation solutions that are simple, smart, and secure and give business owners and their advisors real-time visibility of a business's finance systems and inventory..

For European Union data protection purposes, we act as a Processor in relation to your personal data. Please see our Data Processing Addendum for further detailed information and terms.

How we collect your data

When you visit our websites or use our services, we collect personal data. The ways we collect it can be broadly categorised into the following:

Information you provide to us directly: When you visit or use some parts of our websites and/or services we might ask you to provide personal data to us. For example, we ask for your contact information when you sign up for a free trial, respond to a job application or an email offer, participate in community forums, join us on social media, take part in training and events, contact us with questions or request support.

If you don't want to provide us with personal data, you don't have to, but it might mean you can't use some parts of our websites or services.

Information we collect automatically: We collect some information about you automatically when you visit our websites or use our services, like your IP address and device type. We also collect information when you navigate through our websites and services, including what pages you looked at and what links you clicked on. This information is useful for us as it helps us get a better understanding of how you're using our websites and services so that we can continue to provide the best experience possible (e.g. by personalising the content you see).

Some of this information is collected using cookies and similar tracking technologies.

Information we get from third parties: The majority of information we collect, we collect directly from you. Sometimes we might collect personal data about you from other sources, such as publicly available materials or trusted third parties like our marketing and research partners. We use this information to supplement the personal data we already hold about you, in order to better inform, personalise and improve our services, and to validate the personal data you provide.

Where we collect personal data, we'll only process it:

- to perform a contract with you, or;
- where we have legitimate interests to process the personal data and they're not overridden by your rights, or;
- in accordance with a legal obligation, or;
- where we have your consent.

If we don't collect your personal data, we may be unable to provide you with all our services, and some functions and features on our websites may not be available to you.

If you're someone who doesn't have a relationship with us, but believe that a Zudello subscriber has entered your personal data into our websites or services, you'll need to contact that Zudello subscriber for any questions you have about your personal data (including where you want to access, correct, amend, or request that the user delete, your personal data).

Australian Privacy Principles (for Australian customers)

Zudello will not use or disclose any Personal Information for a purpose other than discharging its obligations under this agreement. Zudello further agrees to comply with the Australian Privacy Principles contained in schedule 1 to the Privacy Act 1988 (Cth) (or an applicable privacy code approved by the Commissioner pursuant to that Act) in the same way and to the same extent as the Customer would have been required to comply had the Customer been directly responsible for performing the act or practice concerned. Zudello will take all reasonable steps to protect Personal Information in its possession against misuse or loss and Zudello will (subject to any other rights which Zudello has) return all such information to the Customer (or if requested by the Customer, destroy or de-identify such information) upon termination or expiry of this agreement.

The Customer warrants that the disclosure of Personal Information to Zudello for the purposes of this Agreement, and the collection of such information, will not contravene the Australian Privacy Principles.

How we use your data

First and foremost, we use your personal data to operate our websites and provide you with any services you've requested, and to manage our relationship with you. We also use your personal data for other purposes, which may include the following:

To communicate with you. This may include:

- providing you with information you've requested from us (like training or education materials) or information we are required to send to you
- operational communications, like changes to our websites and services, security updates, or assistance with using our websites and services
- marketing communications (about Zudello about product announcements, software updates, and special offers.) in accordance with your marketing preferences

- asking you for feedback or to take part in any research we are conducting (which we may engage a third party to assist with).

To support you: This may include assisting with the resolution of technical support issues or other issues relating to the websites or services, whether by email, in-app support or otherwise.

To assist you: Zudello has a number of qualified sales & support agents throughout the world. Either during or after your trial of Zudello, Zudello may either directly or ask a local agent / advisor to make contact with you regarding your trial. The purpose of these advisors is to assist with the scope, implementation and ongoing support of your Zudello system. You may ask Zudello to not be contacted by anyone during the signup process by responding to Zudello at either sales@zudello.com or support@zudello.com

To enhance our websites and services and develop new ones: For example, by monitoring the use of websites and services so we can keep improving, or by carrying out technical analysis of our websites and services so that we can optimise your user experience and provide you with more efficient tools.

To protect you: So that we can detect and prevent any fraudulent or malicious activity, and make sure that everyone is using our websites and services fairly and in accordance with our Terms & Conditions.

To market to you: In addition to sending you marketing communications, we may also use your personal data to display targeted advertising to you online – through our own websites and services or through third party websites and their platforms.

To analyse, aggregate and report: We may use the personal data we collect about you and other users of our websites and services (whether obtained directly or from third parties) to produce aggregated and anonymised analytics and reports and also to improve our algorithms and models, which we may share publicly or with third parties.

By using the Service, you consent to your personal information being collected, held and used in this way and for any other use you authorise. Zudello will only use your personal information for the purposes described in this Policy or with your express permission.

It is your responsibility to keep your password to the Service safe. you should notify us as soon as possible if you become aware of any misuse of your password, and immediately change your password within the Service or via the “Forgotten Password” process.

Zudello does not store your credit card details

If you choose to pay for the Service by credit card, your credit card details are not stored by Zudello and cannot be accessed by Zudello staff. Your credit card details are encrypted and

securely stored by a third-party payment gateway to enable Zudello to automatically bill your credit card on a recurring basis.

How we can share your data

There will be times when we need to share your personal data with third parties. We will only disclose your personal data to:

Third party service providers and partners who assist and enable us to use the personal data to, for example, support delivery of or provide functionality on the platform or:

- regulators, law enforcement bodies, government agencies, courts or other third parties where we think it's necessary to comply with applicable laws or regulations, or to exercise, establish or defend our legal rights.
 - Where possible and appropriate, we will notify you of this type of disclosure
- An actual or potential buyer (and its agents and advisers) in connection with an actual or proposed purchase, merger or acquisition of any part of our business, which will be governed by strict confidentiality agreements.
- Other people where we have your consent.

Data Transfers

If you require us to assist in the provision of AI Document Training then it may be accessed in other regions, where our "Human-in-the-Loop" AI data review teams are located. These countries may have laws that are different to what you're used to. Rest assured, where we use these teams, we put safeguards in place to ensure your personal data remains protected.

For Australian customers the data will only be accessed from within Australia.

For individuals in the European Economic Area (EEA), this means that your data may be transferred outside of the EEA. Where your personal data is transferred outside the EEA, it will only be transferred to teams in countries that have been identified as providing adequate protection for your data, or to a third party where we have approved transfer mechanisms in place to protect your personal data.

Security

Security is a priority for us when it comes to your personal data. We're committed to protecting your personal data and have appropriate technical and organisational measures in place to make sure that happens. Please see our Security Summary available on our website.

Retention

The length of time we keep your personal data depends on what it is and whether we have an ongoing business need to retain it (for example, to provide you with a service).

We'll retain your personal data for as long as we have a relationship with you and for a period of time afterwards where we have an ongoing business need to retain it, in accordance with our data retention policies and practices. Following that period, we'll make sure it's deleted or anonymised.

If your subscription lapses, Within 30 days following lapse, Zudello can provide the Account Owner with a full export of the Organisation's data in a common file format determined by Zudello, for a fee.

The Organisation's data may be permanently deleted by Zudello 6 months after the Organisation stops paying to use the Zudello Service, or at the Account Owner's request (a fee may be applicable for such requests).

Your rights

It's your personal data and you have certain rights relating to it. When it comes to marketing communications, you can ask us not to send you these at any time – just follow the unsubscribe instructions contained in the marketing communication, or send your request to

privacy@zudello.com

You also have rights to:

- Know what personal data we hold about you, and to make sure it's correct and up to date
- Request a copy of your personal data, or ask us to restrict processing your personal data or delete it
- Object to our continued processing of your personal data.

You can exercise these rights at any time by sending an email to privacy@zudello.com

If you're not happy with how we are processing your personal data, please let us know by sending an email to privacy@zudello.com. We will review and investigate your complaint, and get back to you within a reasonable time frame.

How to contact us

We're always keen to hear from you.

As a technology company, we prefer to communicate with you by email – this ensures that you're put in contact with the right person, in the right location, and in accordance with any regulatory time frames.

If you wish to complain about how we have handled your personal information, please provide our Privacy Officer with full details of your complaint and any supporting documentation:

- by email at privacy@zudello.com, or
- by letter to The Privacy Officer, Zudello, Level 12, 410 Ann Street, Brisbane, QLD 4000, Australia.

Our Privacy Officer will endeavour to:

- provide an initial response to your query or complaint within 10 business days,
- and investigate and attempt to resolve your query or complaint within 30 business days or such longer period as is necessary and notified to you by our Privacy Officer.

Our email is privacy@zudello.com

Data Processing Addendum

This is available on our website and provides further details on data privacy and security.