

## WEBSITE PRIVACY POLICY

This Privacy Policy applies to all personal information collected by NextAura Solutions Pty Ltd (**we, us** or **our**) via the website located at [www.circletrust.com.au](http://www.circletrust.com.au) (**Website**).

### 1. What information do we collect?

The kind of Personal Information that we collect from you will depend on how you use the website. The Personal Information which we collect and hold about you may include:

We collect the following personal information from users of the CircleTrust platform:

- Name and contact details (email address, phone number)
- Account credentials (username, password)
- Business information (company name, ABN, business address)
- Payment and billing information (credit card details, bank account information)
- Usage data and analytics (IP address, browser type, device information, pages visited)
- Communication records (support enquiries, feedback, correspondence)
- Professional information relevant to the services provided through the platform
- Any other information you choose to provide when using our SaaS services

### 2. Types of information

The Privacy Act 1998 (Cth) (Privacy Act) defines types of information, including Personal Information and Sensitive Information.

**Personal Information** means information or an opinion about an identified individual or an individual who is reasonably identifiable:

- (a) whether the information or opinion is true or not; and
- (b) whether the information or opinion is recorded in a material form or not.

If the information does not disclose your identity or enable your identity to be ascertained, it will in most cases not be classified as “Personal Information” and will not be subject to this privacy policy.

**Sensitive Information** is defined in the Privacy Act as including information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive Information will be used by us only:

- (a) for the primary purpose for which it was obtained;
- (b) for a secondary purpose that is directly related to the primary purpose; and

- (c) with your consent or where required or authorised by law.

### **3. How we collect your Personal Information**

- (a) We may collect Personal Information from you whenever you input such information into the Website, related app or provide it to Us in any other way.
- (b) We may also collect cookies from your computer which enable us to tell when you use the Website and also to help customise your Website experience. As a general rule, however, it is not possible to identify you personally from our use of cookies.
- (c) We generally don't collect Sensitive Information, but when we do, we will comply with the preceding paragraph.
- (d) Where reasonable and practicable we collect your Personal Information from you only. However, sometimes we may be given information from a third party, in cases like this we will take steps to make you aware of the information that was provided by a third party.

### **4. Purpose of collection**

- (a) We collect Personal Information to provide you with the best service experience possible on the Website and keep in touch with you about developments in our business.
- (b) We customarily only disclose Personal Information to our service providers who assist us in operating the Website. Your Personal Information may also be exposed from time to time to maintenance and support personnel acting in the normal course of their duties.
- (c) We disclose Personal Information to the following categories of service providers: payment processors for credit card and bank account processing; cloud infrastructure providers for data storage; analytics providers for usage tracking; and email service providers for communications. All service providers are contractually required to comply with the Australian Privacy Principles and maintain equivalent security standards. We remain accountable for their compliance and a current list of service providers is available upon request.
- (d) By using our Website, you consent to the receipt of direct marketing material. We will only use your Personal Information for this purpose if we have collected such information direct from you, and if it is material of a type which you would reasonably expect to receive from use. We do not use sensitive Personal Information in direct marketing activity. Our direct marketing material will include a simple means by which you can request not to receive further communications of this nature, such as an unsubscribe button link.

### **5. Security, Access and correction**

- (a) We store your Personal Information in a way that reasonably protects it from unauthorised access, misuse, modification or disclosure. When we no longer require your Personal Information for the purpose for which we obtained it, we will take reasonable steps to destroy and anonymise or de-identify it. Most of the Personal Information that is stored in

our client files and records will be kept for a maximum of 7 years years to fulfill our record keeping obligations.

- (a) We retain Personal Information for the following periods: (1) Payment and billing information: [7] years to comply with taxation and anti-money laundering obligations; (2) Usage analytics and IP data: [12] months; (3) Communication and support records: [3] years; (4) Account credentials: duration of account plus [12] months; (5) Business information: duration of service relationship plus [2] years. Upon expiry of these periods, we securely destroy or de-identify data within [30] days.
- (b) The Australian Privacy Principles:
  - (i) permit you to obtain access to the Personal Information we hold about you in certain circumstances (Australian Privacy Principle 12); and
  - (ii) allow you to correct inaccurate Personal Information subject to certain exceptions (Australian Privacy Principle 13).
- (c) Where you would like to obtain such access, please contact us in writing on the contact details set out at the bottom of this privacy policy.

## **6. Complaint procedure**

If you have a complaint concerning the manner in which we maintain the privacy of your Personal Information, please contact us as on the contact details set out at the bottom of this policy. All complaints will be considered by Directors and we may seek further information from you to clarify your concerns. If we agree that your complaint is well founded, we will, in consultation with you, take appropriate steps to rectify the problem. If you remain dissatisfied with the outcome, you may refer the matter to the Office of the Australian Information Commissioner.

## **7. Overseas transfer**

Your Personal Information will not be disclosed to recipients outside Australia unless you expressly request us to do so. If you request us to transfer your Personal Information to an overseas recipient, the overseas recipient will not be required to comply with the Australian Privacy Principles and we will not be liable for any mishandling of your information in such circumstances.

## **8. How to contact us about privacy**

If you have any queries, or if you seek access to your Personal Information, or if you have a complaint about our privacy practices, you can contact us through: [info@nextaura.com.au](mailto:info@nextaura.com.au).

## **9. Data breach notification**

If we discover a data breach likely to result in serious harm to affected individuals, we will notify you and the Office of the Australian Information Commissioner within 14 days of discovery. Notification will be provided via email or SMS and will include details of the breach, the data affected, and recommended protective steps. Serious harm includes identity theft, financial loss, or reputational damage.