



CentrePal Pty Ltd

Privacy Notice

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1. Introduction

CentrePal Pty Ltd. (referred to as “We”, “Our”, “CentrePal” or “Us”), is committed to protecting the privacy and security of your personal information. We take care to protect the privacy of our customers and users of our products that communicate (online or offline) with us, over the phone, through our SaaS applications and websites. We have therefore developed this Privacy Notice to inform you of the data we collect, what we do with your information, what we do to keep it secure, as well as the rights and choices you have over your personal information.

You can contact us either by phone, email, post or by visiting this page on our website.

- Our main registered postal address:
CentrePal Pty Ltd,
Level 3/480 Collins Street,
Melbourne VIC 3000 Australia.
- Our email address,
privacy@centrepal.com
- Our website
<https://www.centrepal.com/>

In its everyday business operations CentrePal makes use of a variety of data about identifiable individuals, including data about:

- Current, past and prospective employees and contractors
- Customers
- Users of its websites
- Other stakeholders

In collecting and using this data, the organization is subject to a variety of legislation controlling how such activities may be carried out and the safeguards that must be put in place to protect it.

The purpose of this policy is to set out the relevant legislation and to describe the steps CentrePal is taking to ensure that it complies with it.

This control applies to all systems, people and processes that constitute the organization’s information systems, including board members, directors, employees and other third parties who have access to CentrePal systems.

2. The General Data Protection Regulation

The General Data Protection Regulation 2016 (GDPR) is one of the most significant pieces of legislation affecting the way that CentrePal carries out its information processing activities. Significant fines are applicable if a breach is deemed to have occurred under the GDPR, which is designed to protect the personal data of citizens of the European Union. It is CentrePal's policy to ensure that our compliance with the GDPR and other relevant legislation is clear and demonstrable at all times.

2.1. Definitions

There are a total of 26 definitions listed within Article 4 – Definitions of the GDPR and it is not appropriate to reproduce them all here. However, the most fundamental definitions with respect to this policy are as follows:

Personal data is defined as: *“any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.”*

Processing means: *“any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.”*

Controller means: *“the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.”*

Account - means a unique account created for You to access our Service or parts of our Service.

Cookies - are small files that are placed on Your computer, mobile device, or any other device by a website, containing the details of Your browsing history on that website among its many uses.

Device - means any device that can access the Service such as a computer, a cell phone, or a digital tablet

Usage Data - refers to data collected automatically, either generated using the Service or from the Service infrastructure itself (for example, the duration of a page visit).

Website - refers to CentrePal website, accessible from <https://www.centrepal.com/>

You - means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable

Service – refers to SaaS solutions offered by CentrePal that is subject to GDPR regulations.

3. CentrePal Role with respect to your personal data

3.1. Controller

Within the scope of this notice, CentrePal acts as a data controller for the Personal Data we collect from employees, customers and other stakeholders. Further we act as the data controller for the personal data we collect from the visitors that visit our websites.

3.2. Processor

Within the scope of this notice, CentrePal acts as a data processor for the End User's Personal Data we process in respect of the **Services**.

4. How and what data will be Collected

4.1. Types of Data Collected

4.1.1. Personal Data

While using Our Service, we may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You. Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address, State, Province, ZIP/Postal code, City, Country
- Usage Data
- Occupation
- Language preference

4.1.2. Usage Data

Usage Data is collected automatically when using the Service.

Usage Data may include information such as Your IP address, browser type, browser version, the pages of our Service that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access the Service by or through a mobile device, we may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.

We may also collect information that Your browser sends whenever You visit our Service or when You access the Service by or through a mobile device.

4.2. Tracking Technologies and Cookies

We use Cookies and similar tracking technologies to track the activity on Our Service and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyse Our Service. The technologies We use may include:

Cookies or Browser Cookies. A cookie is a small file placed on Your Device. You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if You do not accept Cookies, you may not be able to use some parts of our Service. Unless you have adjusted Your browser setting so that it will refuse Cookies, our Service may use Cookies.

Web Beacons. Certain sections of our Service and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on Your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close Your web browser.

We use both Session and Persistent Cookies for the purposes set out below:

Necessary / Essential Cookies

Type: Session Cookies

Administered by: Us

Purpose: These Cookies are essential to provide You with services available through the Website and to enable You to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. We rely on Microsoft authentication library and we leverage authenticated users' information through Microsoft authentication library for Our Service. Without these Cookies, the services

that You have asked for cannot be provided, and We only use these Cookies to provide You with those services.

Cookies Policy /Notice Acceptance Cookies

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies identify if users have accepted the use of cookies on the Website.

Functionality Cookies

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies allow us to remember choices You make when You use the Website, such as remembering your login details or language preference. The purpose of these Cookies is to provide You with a more personal experience and to avoid You having to re-enter your preferences every time You use the Website.

Tracking and Performance Cookies

Type: Persistent Cookies

Administered by: Third Parties

Purpose: These Cookies are used to track information about traffic to the Website and how users use the Website. The information gathered via these Cookies may directly or indirectly identify you as an individual visitor. This is because the information collected is typically linked to a pseudonymous identifier associated with the device you use to access the Website. We may also use these Cookies to test new pages, features, or new functionality of the Website to see how our users react to them.

Local Storage

Type: local storage

Administered by: Us and third parties

Purpose: Local Storage is a property that allows JavaScript sites and apps to save key-value pairs in a web browser with no expiration date. This means the data stored persists even after the user closes the browser or restarts the computer'. These local storage keys may include lastLogin, user name, tenantId and userId.

5. How the collected data will be used

CentrePal may use Personal Data for the following purposes:

- **To provide and maintain our Service**, including to monitor the usage of our Service.
- **To manage Your Account:** to manage Your registration as a user of the Service. The Personal Data You provide can give You access to different functionalities of the Service that are available to You as a registered user.
- **For the performance of a contract:** the development, compliance and undertaking of the purchase contract for the products, items, or services You have purchased or of any other contract with Us through the Service.
- **To contact You:** To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products, or contracted services, including the security updates, when necessary or reasonable for their implementation.
- **To provide You with news**, special offers and general information about other goods, services, and events which we offer that are similar to those that you have already purchased or enquired about unless You have opted not to receive such information.
- **To manage Your requests:** To attend and manage Your requests to Us.
- **To help you quickly find** products, services, or information.
- **For business transfers:** We may use Your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all Our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by Us about our Service users is among the assets transferred.
- **For other purposes:** We may use Your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Service, products, services, marketing, and your experience.

We may **share or disclose** Your personal information in the following situations:

- **With Service Providers:** We may share Your personal information with Service Providers to monitor and analyse the use of our Service, for payment processing, for processing event registration, to contact You.

- **For business transfers:** We may share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of Our business to another company.
- **With Affiliates:** We may share Your information with Our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us.
- **With business partners:** We may share Your information with Our business partners to offer You certain products, services, or promotions.
- **With other users:** when You share personal information or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside.
- **With Your consent:** We may disclose Your personal information for any other purpose with Your consent.
- **Anonymous and Aggregated.** We may also share anonymous and aggregated usage data in the normal course of operating our business; for example, we may share information publicly to show trends about the general use of our Services.
- **Law Enforcement:** Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g., a court or a government agency).
- **Other Legal Requirements:** The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:
 - Comply with a legal obligation
 - Protect and defend the rights or property of the Company
 - Prevent or investigate possible wrongdoing in connection with the Service
 - Protect the personal safety of Users of the Service or the public
 - Protect against legal liability

6. How long the personal data will be kept for

We will retain your Personal Data for as long as necessary for the relevant purpose for which it was provided or collected, in accordance with our then-current data retention policy, unless you otherwise request that it to be deleted sooner in accordance with this policy and applicable laws.

7. Principles relating to processing of personal data

There are several fundamental principles upon which the GDPR is based.

These dictate that personal data shall be:

1. Processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency').
 2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes ('purpose limitation').
 3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation').
 4. Accurate and, where necessary, kept up to date ('accuracy')
 5. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed ('storage limitation').
 6. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').
- In addition, the controller shall be responsible for, and be able to demonstrate compliance with all of these principles ('accountability').

CentrePal must ensure that it complies with all these principles both in the processing it currently carries out and as part of the introduction of new methods of processing such as new IT systems. The operation of an information security management system (ISMS) that conforms to the ISO/IEC 27001 international standard is a key part of that commitment.

8. Rights of the data subject

The data subject also has rights under the GDPR. These consist of:

- **The right to be informed** - You have the right to be informed about the collection and use of your personal data. This information is provided in our privacy notice.
- **The right of access** - You have the right to request access to the personal data we hold about you. Upon request, we will provide you with information about the data we process and how it's used.
- **The right to erasure** - You have the right to request the deletion of your personal data when it's no longer necessary for the purpose for which it was collected or if you withdraw your consent, subject to legal and contractual obligations.
- **The right to restrict processing** - You have the right to request the restriction of the processing of your personal data under certain circumstances, such as disputing the accuracy of the data.
- **The right to data portability** - You have the right to receive your personal data in a structured, commonly used, and machine-readable format and to request the transfer of your data to another data controller.

- **The right to object** - You have the right to object to the processing of your personal data, including for direct marketing purposes or where the processing is based on legitimate interests, unless we can demonstrate compelling legitimate grounds for the processing.
- **Rights in relation to automated decision making and profiling** - You have the right not to be subject to decisions based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you. We will inform you if such decisions are made, provide you with meaningful information about the logic involved, and allow you to challenge those decisions.
- **Right of access by the data subject** - You have the right to request access to the personal data we hold about you. Upon request, we will provide you with information about the data we process and how it's used.
- **Right to restriction of processing** - You have the right to request the restriction of the processing of your personal data under certain circumstances, such as disputing the accuracy of the data.

Each of these rights must be supported by appropriate procedures within CentrePal that allow the required action to be taken within the timescales stated in the GDPR.

These timescales are shown in Table 1.

DATA SUBJECT REQUEST	TIMESCALE
The right to be informed	When data is collected (if supplied by data subject) or within one month (if not supplied by data subject)
The right of access	One month
The right to erasure	Without undue delay
The right to restrict processing	Without undue delay
The right to data portability	One month
The right to object	On receipt of objection
Rights in relation to automated decision making and profiling.	Not specified

Table 1: Timescales for data subject requests

9. Consent

Unless it is necessary for a reason allowable in the GDPR, consent must be obtained from a data subject to collect and process their data. We do not intentionally gather Personal Data about visitors who are under the age of 16. In case of children below the age of 16 (Note – this age may be lower in individual EU member states) parental consent must be obtained. Transparent

information about our usage of their personal data must be provided to data subjects at the time that consent is obtained and their rights regarding their data explained, such as the right to withdraw consent. This information must be provided in an accessible form, written in clear language and free of charge.

If the personal data are not obtained directly from the data subject, then this information must be provided within a reasonable period after the data are obtained and definitely within one month.

10. Privacy by design

CentrePal has adopted the principle of privacy by design and will ensure that the definition and planning of all new or significantly changed systems that collect, or process personal data will be subject to due consideration of privacy issues, including the completion of one or more privacy (also known as data protection) impact assessments.

The privacy impact assessment will include:

- Consideration of how personal data will be processed and for what purposes
- Assessment of whether the proposed processing of personal data is both necessary and proportionate to the purpose(s)
- Assessment of the risks to individuals in processing the personal data
- What controls are necessary to address the identified risks and demonstrate compliance with legislation

Use of techniques such as data minimization and pseudonymisation will be considered where applicable and appropriate.

11. Transfer of personal data

As you register on our Service, your Personal Data is being stored outside of the EU on our servers in Australia. If we further transfer this Personal Data, it will be transferred to a sub processor that:

(i) is located in a third country or territory recognized by the EU Commission to have an adequate level of protection; or

(ii) we have entered into Standard Contractual Clauses with; or

(iii) has other legally recognized appropriate safeguards in place, such as Binding Corporate Rules. By submitting your Personal Data, you agree to this transfer, storing or processing of your Personal Data outside of the EEA and the UK.

12. Data protection officer

Please note that we have a data protection officer (DPO) who can be contacted as follows: data-protection@centrepal.com. For any data privacy related issues, CentrePal DPO shall be contacted via this email.

13. Breach notification

It is CentrePal's policy to be fair and proportionate when considering the actions to be taken to inform affected parties regarding breaches of personal data. In line with the GDPR, where a breach is known to have occurred which is likely to result in a risk to the rights and freedoms of individuals, the relevant supervisory authority will be informed within 72 hours. This will be managed in accordance with our *Information Security Incident Response Procedure* which sets out the overall process of handling information security incidents.

14. Addressing compliance to the GDPR

The following actions are undertaken to ensure that CentrePal complies at all times with the accountability principle of the GDPR:

- The legal basis for processing personal data is clear and unambiguous
- The Data Protection Officer is appointed with specific responsibility for data protection in CentrePal.
- All staff involved in handling personal data understand their responsibilities for following good data protection practice
- Training in data protection has been provided to all staff
- Rules regarding consent are followed
- Routes are available to data subjects wishing to exercise their rights regarding personal data and such enquiries are handled effectively
- Regular reviews of procedures involving personal data are carried out
- Privacy by design is adopted for all new or changed systems and processes
- The following documentation of processing activities is recorded:
 - Organization name and relevant details
 - Purposes of the personal data processing
 - Categories of individuals and personal data processed
 - Categories of personal data recipients
 - Agreements and mechanisms for transfers of personal data to non-EU countries including details of controls in place
 - Personal data retention schedules
 - Relevant technical and organisational controls in place

These actions will be reviewed on a regular basis as part of the management review process of the information security management systems