BEEGLE PRIVACY POLICY

Effective Date: 17 May 2026

This Privacy Policy ("**Policy**") describes how Beegle Software Pty Ltd ACN 689 698 306 ("**Beegle**", "**we**", "**us**", "**our**") collects, uses, discloses, and stores personal information when you use our Service. This Policy forms part of the Beegle User Agreement and Service Level Agreement. In the event of conflict, the terms of this Policy shall prevail with respect to personal information handling.

We acknowledge the importance of your privacy and are committed to protecting your personal information. Your personal information will only be used for the purposes for which it is collected or in accordance with the Privacy Act 1988 (Cth) ("**Act**"), including the Australian Privacy Principles, which are set out in the Act.

1) INFORMATION WE COLLECT

"Personal information" is information we hold, which is identifiable as being about you, as defined by the Act. We will not collect "sensitive information."

We may collect personal information such as your name, birth date, phone number and address, website and AFSL details to enable us to send information, provide updates and deliver the Service. We may also collect financial information (i.e., commercial credit activities, overdue payment information, guarantor information) as well as government identifiers such as your ABN or registered business names.

We may ask you directly to provide us with information.

Personal information may also be provided by an entity/person authorised by you to do so, such as your employees or a corporate or business entity with which you are involved either as a principal, member, or beneficiary, for the purpose of providing services to or on your behalf.

We may collect additional information at other times, including but not limited to, when you provide feedback, when you provide information about your personal or business affairs, change your content or email preference, respond to surveys and/or promotions, provide financial or credit card information, or communicate with our customer support.

You have no obligation to provide any information requested by us. However, if you choose to withhold personal information from us, it may prevent us from being able to provide you with the services that you have requested.

2) HOW WE USE INFORMATION

We collect personal information to operate our business to provide and market our Service to you. This includes the following purposes:

a) those necessary or incidental to delivering those services;

b) processing payments and managing your customer account;

c) communicating with you and responding to your enquiries;

d) improving our services and customer experience;

e) sending you marketing communications (that you can opt out of at any time);

f) complying with our legal obligations;

g) purposes authorised by law or required to meet our legal obligations; and

h) any other purposes disclosed to you or authorised by you, or that you would reasonably expect.

We use AI technologies to enhance features and provide analysis within the platform. We do not use client data to train AI models, and AI processes operate solely to deliver the services you have authorised.

3) DISCLOSURE

We may disclose your personal information to any of our employees, officers, insurers, professional advisers, agents, suppliers, or subcontractors insofar as reasonably necessary for the purposes set out in this Privacy Policy. Personal information is only supplied to a third party (including, but not limited to, providers such as Stripe, Mailtrap, Mailchimp, Xero, Annature, Microsoft 365 and Retiremap) when it is required for the delivery of our services.

We use Stripe, an external payment service provider, to process subscription and other payments. Your payment information is transmitted securely to Stripe and handled in accordance with Stripe's privacy and security policies. We do not store sensitive payment credentials on our systems.

Where you authorise an integration between the Service and a third-party platform (including via APIs offered or supported by Beegle), data transmitted to that third party as a result of the integration is governed by the third party's terms and privacy policy. You are responsible for reviewing those terms and for obtaining any necessary consents from the individuals whose personal information is transmitted. Beegle does not control how the third party handles, stores or uses such data and is not responsible for any data breach or other incident occurring on the third party's systems.

We may from time to time need to disclose personal information to comply with a legal requirement, such as a law, regulation, court order, subpoena, warrant, and in the course of a legal proceeding or in response to a law enforcement agency request.

As part of provision of services to you, we may store your personal information using online or cloud software. The personal information that you provide to us may be transferred to the servers of our software providers as a function of transmission across the internet. By providing your personal information you are consenting to that personal information being transferred to and stored on the servers as set out in this Privacy Policy. However, as the third parties who host our servers do not control, and are not permitted to access or use your personal information (except for the limited purpose of storing the information), we do not "disclose" personal information to those server hosts, whether or not they are located overseas.

4) DATA STORAGE AND SECURITY

We are committed to ensuring that the information you provide to us is secure at all times. All client data is stored securely in Australia using Amazon S3 and fly.io (as updated from time to time).

In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic, and managerial procedures to safeguard and secure information and protect it from misuse, interference, loss and unauthorised access, modification, and disclosure. Data is encrypted in transit and at rest, and access is restricted to authorised personnel. We periodically review and update our security measures in light of current technologies. However, the internet is not secure, and we cannot guarantee the security of any information sent to us via the internet, nor can we guarantee that our data storage measures are absolutely secure at all times.

While we take the security of your personal information very seriously, sometimes a data breach can occur. Under the Act, an "Eligible Data Breach" is where there is an unauthorised access or disclosure of, personal information, or loss of personal information that has the potential to cause serious harm to the individual that the data pertains to, and we have not been able to prevent the likely risk of serious harm with remedial action. If we have reasonable grounds to believe that an Eligible Data Breach has occurred on Beegle's systems we will notify you and the Office of the Australian Information Commissioner as soon as reasonably possible. Where a data breach occurs on a third-party platform integrated with the Service (and not on Beegle's systems), the third party is responsible for any notification obligations under applicable law; Beegle will, where reasonably practicable, pass through any notice received from such third party.

5) RETENTION

We retain personal information as long as necessary to provide the Service, maintain your account and comply with our legal obligations, unless you request us to delete this information.

After this period, we will destroy personal information in a secure manner or take steps to de-identify personal information we hold when it is no longer needed or when we are lawfully authorised or required to do so.

6) YOUR RIGHTS OF ACCESS AND CORRECTION

You have the right to request access to the personal information we hold about you and to request its correction where it is inaccurate, out of date, or incomplete. We may require you to verify your identity before we communicate with you about your personal information.

We will only refuse to provide you with information that we hold about you where we consider it absolutely necessary, and as permitted by the Act. If we refuse your request for information, we will explain the reasons for our decision in our refusal.

We will deal with all requests to access personal information as quickly as possible, however we may charge a fee for providing access.

7) COOKIES

We use cookies to monitor the traffic to the various pages on our website, for statistical and website improvement purposes only. This information is anonymous and will not enable you to be identified. Cookies are small data files transferred onto computers or devices by websites for record-keeping purposes and to improve your website user experience. You can disable cookies (and applets, or similar) via your computer's web browser. However, this may restrict access to some webpages and services within our website.

8) CHANGES

We may update this Policy from time to time with notice of material changes communicated via email or platform notifications.

9) ANONYMITY AND COMPLAINTS

You can choose to deal with us anonymously and we will do our best to action any request or complaint that you supply to us. However, without providing your identity, we may be limited in the action that we can take in relation to your enquiry or complaint.

If you have any complaints about our privacy practices, please feel free to contact us. We take complaints very seriously and will respond shortly after receiving written notice of your complaint.

For more information about privacy issues in Australia and protecting your privacy, or to make a complaint about our handling of your personal information, you can visit the Office of the Australian Information Commissioner's website via http://www.oaic.gov.au/.

10) GOVERNING LAW

This Policy is governed by the laws of New South Wales, Australia.

11) CONTACT US

For more information about our privacy practices, if you have questions, or if you would like to make a comment or complaint, please contact:

Privacy Officer
Beegle Software Pty Ltd
contact@beegle.au
275A Hunter Street, Newcastle NSW 2300