

PRIVACY POLICY

ProcurePro

Last updated: 2 September 2024

In this Privacy Policy, **we, us or our** means Procure Pro Holdings Pty Ltd ABN 72 650 689 375 and all group companies of Procure Pro Holdings Pty Ltd ABN 72 650 689 375, including Blenktech Pty Ltd ABN 12 620 650 553, Procure Pro Seed Investments Pty Ltd ACN 651 287 017 and ProcurePro UK Limited (Company No. 15155594).

We understand that protecting your personal information is important. This Privacy Policy sets out our commitment to protecting the privacy of personal information provided to us, or collected by us, when interacting with you.

This Privacy Policy takes into account the requirements of the *Privacy Act 1988* (Cth). In addition to the Australian laws, individuals located in the European Union or European Economic Area (**EU**) may also have rights under the *General Data Protection Regulation 2016/679* and individuals located in the United Kingdom (**UK**) may have rights under the General Data Protection Regulation (EU) 2016/679 (UK GDPR) and the Data Protection Act 2018 (DPA 2018) (together, the **GDPR**). Appendix 1 outlines the details of the additional rights of individuals located in the EU and UK as well as information on how we process the personal information of individuals located in the EU and UK.

The information we collect

Personal information: is information or an opinion, whether true or not and whether recorded in a material form or not, about an individual who is identified or reasonably identifiable.

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

- **Identity Data** including your name and job title.
- **Contact Data** including your telephone number, address and email.
- **Financial Data** including bank account and payment card details (through our third party payment processor, who stores such information and we do not have access to that information).
- **Technical and Usage Data** when you access any of our websites or platforms, details about your internet protocol (IP) address, login data, browser session and geo-location data, statistics on page views and sessions, device and network information, acquisition sources, search queries and/or browsing behaviour, access and use of our website (including through the use of Internet cookies), and communications with our website.
- **Profile Data** including your username and password for ProcurePro and information you share with our platform, and support requests you have made.
- **Marketing and Communications Data** including your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Professional data** including where you are a worker of ours or applying for a role with us, your professional history such as your previous positions and professional experience.
- **Sensitive information** is a sub-set of personal information that is given a higher level of protection. 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 or practices, criminal records, health information or biometric information. We do not actively request sensitive information about you. If at any time we need to collect sensitive information about you, unless otherwise permitted by law, we will first obtain your consent and we will only use it as required or authorised by law.

How we collect personal information

We collect personal information in a variety of ways, including:

- when you provide it directly to us, including face-to-face, over the phone, over email, or online;
- when you complete a form, such as the 'contact us' form on our website, downloading any of our white papers or signing up for any other content, or responding to surveys;
- when you use any website we operate (including from any analytics and cookie providers or marketing providers. See the "Cookies" section below for more detail on the use of cookies);
- from third parties, such as where our clients input information into our platform about their supply chain, and it includes your contact details; or
- from publicly available sources.

Why we collect, hold, use and disclose personal information

We have set out below, in a table format, a description of the purposes for which we plan to collect, hold, use and disclose your personal information.

Purpose of use / disclosure	Type of Personal Information
To enable you to access and use our software, including to provide you with a login and to do business with you.	<ul style="list-style-type: none"> • Identity Data • Contact Data
To contact and communicate with you about our business, including in response to any support requests you lodge with us or other enquiries you make with us.	<ul style="list-style-type: none"> • Identity Data • Contact Data • Profile Data
To contact and communicate with you about any enquiries you make with us via any website we operate.	<ul style="list-style-type: none"> • Identity Data • Contact Data
For internal record keeping, administrative, invoicing and billing purposes.	<ul style="list-style-type: none"> • Identity Data • Contact Data • Financial Data • Transaction Data
For analytics, market research and business development, including to operate and improve our business, associated applications and associated social media platforms.	<ul style="list-style-type: none"> • Profile Data • Technical and Usage Data
For advertising and marketing, including to send you promotional information about our events and experiences and information that we consider may be of interest to you.	<ul style="list-style-type: none"> • Identity Data • Contact Data • Technical and Usage Data • Profile Data • Marketing and Communications Data
If you have applied for employment with us, to consider your employment application.	<ul style="list-style-type: none"> • Identity Data • Contact Data • Professional Data
To comply with our legal obligations or if otherwise required or authorised by law.	<ul style="list-style-type: none"> • Any relevant Personal Information

Our disclosures of personal information to third parties

Personal information: We may disclose personal information to:

- our employees, contractors and/or related entities;
- IT service providers, data storage, web-hosting and server providers, such as Amazon Web Services and HubSpot;
- marketing or advertising providers;
- professional advisors, bankers, auditors, our insurers and insurance brokers;
- payment systems operators or processors;
- our existing or potential agents or business partners;
- if we merge with, or are acquired by, another company, or sell all or a portion of our assets, your personal information may be disclosed to our advisers and any prospective purchaser’s advisers and may be among the assets transferred;
- 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 or authorised by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights;
- third parties to collect and process data, such as analytics providers and cookies; and
- any other third parties as required or permitted by law, such as where we receive a subpoena.

Google Analytics: We have enabled Google Analytics Advertising Features. We and third-party vendors may use first-party cookies (such as the Google Analytics cookie) or other first-party identifiers, and third-party cookies (such as Google advertising cookies) or other third-party identifiers together. These cookies and identifiers may collect Technical and Usage Data about you.

You can opt-out of Google Analytics Advertising Features including using a Google Analytics Opt-out Browser add-on found [here](#). To opt-out of personalised ad delivery on the Google content network, please visit Google’s Ads Preferences Manager [here](#) or if you wish to opt-out permanently even when all cookies are deleted from your browser you can install their plugin [here](#). To opt out of interest-based ads on mobile devices, please follow these instructions for your mobile device: On android open the Google Settings app on your device and select “ads” to control the settings. On iOS devices with iOS 6 and above use Apple’s advertising identifier. To learn more about limiting ad tracking using this identifier, visit the settings menu on your device.

To find out how Google uses data when you use third party websites or applications, please see [here](#).

Overseas disclosure

We store personal information in Australia (and in the United Kingdom, where you contract with ProcurePro UK Limited (Company No. 15155594)). Where we disclose your personal information to our group companies or third parties, our group companies and those third parties may also store, transfer or access personal information outside of the country where you are based. We will only transfer your personal information overseas in accordance with applicable data protection laws.

Your rights and controlling your personal information

Your choice and consent: Please read this Privacy Policy carefully. If you provide personal information to us, you understand we will collect, hold, use and disclose your personal information in accordance with this Privacy Policy. You do not have to provide personal information to us, however, if you do not, it may affect our ability to do business with you. Prior express consent shall be obtained before collecting or processing personal data for any purpose outside the scope defined in this Privacy Policy. Data subjects maintain the right to withdraw consent at any time by providing notice through the designated contact channels listed herein. Such withdrawal requests will be executed as soon as possible, unless we have a lawful basis to retain the personal data.

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 and unsubscribe: To object to processing for direct marketing/unsubscribe from our email 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.

Access: You may request access to the personal information that we hold about you. An administrative fee may be payable for the provision of such information. Please note, in some situations, we may be legally permitted to withhold access to your personal information. If we cannot provide access to your information, we will advise you as soon as reasonably possible and provide you with the reasons for our refusal and any mechanism available to complain about the refusal. If we can provide access to your information in another form that still meets your needs, then we will take reasonable steps to give you such access.

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 promptly correct any information found to be inaccurate, out of date, incomplete, irrelevant or misleading. Please note, in some situations, we may be legally permitted to not correct your personal information. If we cannot correct your information, we will advise you as soon as reasonably possible and provide you with the reasons for our refusal and any mechanism available to complain about the refusal. We rely on you to ensure that the personal information you provide to us is accurate, complete, and up-to-date. You may contact us at any time to update or correct your information.

Complaints: If you wish to make a complaint, please contact us using the details below and provide us with full details of the complaint. 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 in response to your complaint. If you are not satisfied with our response, you may contact the Office of the Australian Information Commissioner.

We shall implement systematic reviews of our privacy practices, controls, and processing activities to ensure continued adherence to this Privacy Policy and all applicable statutory and regulatory requirements. Any identified instances of non-compliance, whether due to wilful violation or error, will be handled in accordance with internal protocols. Disciplinary measures proportionate to the severity of the breach may be imposed against our employees, which may result in the termination of their employment. We further reserve our legal rights to pursue civil or criminal action against any parties responsible for any unlawful breaches of this policy.

Storage and security

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, to safeguard and secure personal information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

While we are committed to security, 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.

Cookies

We may use cookies on our website from time to time. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally identifiable information. However, they do recognise you when you return to our online website and allow third parties 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 online website with personal information, this information may be linked to the data stored in the cookie.

You can 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 website.

For more information about the cookies we use, please see <https://procurepro.co/cookie-policy>.

Links to other websites

Our website may contain links to other party's 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.

Amendments

We may, at any time and at our discretion, vary this Privacy Policy by publishing the amended Privacy Policy on our website. We recommend you check our website regularly to ensure you are aware of our current Privacy Policy.

For any questions or notices, please contact us at:

Procure Pro Holdings Pty Ltd ABN 72 650 689 375 (Attention: Data Protection Manager)

privacy@procurepro.co

APPENDIX 1: ADDITIONAL RIGHTS AND INFORMATION FOR INDIVIDUALS LOCATED IN THE EU OR UK

Under the GDPR individuals located in the EU and the UK have extra rights which apply to their personal information. Personal information under the GDPR is often referred to as personal data and is defined as information relating to an identified or identifiable natural person (individual). This Appendix 1 sets out the additional rights we give to individuals located in the EU and UK, as well as information on how we process the personal information of individuals located in the EU and UK. Please read the Privacy Policy above and this Appendix carefully and contact us at the details at the end of the Privacy Policy if you have any questions.

What personal information is relevant?

This Appendix applies to the personal information set out in the Privacy Policy above. This includes any Sensitive Information also listed in the Privacy Policy above which is known as 'special categories of data' under the GDPR.

Purposes and legal bases for processing

We collect and process personal information about you only where we have legal bases for doing so under applicable laws. We have set out below, in a table format, a description of all the ways we plan to use your personal information, and which of the legal bases we rely on to do so. The legal bases depend on the services you use and how you use them. This means we collect and use your personal data 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 the provision of our services, 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 send you third party marketing materials); or
- we need to process your data to comply with a legal obligation.

If you have consented to our use of data 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 data because we or a third party 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 doing business with us. Further information about your rights is available below.

Data Transfers

The privacy protections available in the countries to which we send data for the purposes listed above may be less comprehensive than what is offered in the country in which you initially provided the information. Where we transfer your personal information outside of the country where you are based, we will perform those transfers using appropriate safeguards in accordance with the requirements of applicable data protection laws and we will protect the transferred personal information in accordance with this Privacy Policy and Appendix 1. This includes:

- only transferring your personal information to countries that have been deemed by applicable data protection laws to provide an adequate level of protection for personal information; or
- including standard contractual clauses in our agreements with third parties that are overseas.

Data retention

We will only retain your personal information for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

We retain personal information only for as long as necessary to fulfill the purposes outlined in this Privacy Policy, or as required by law. Once your personal information is no longer needed, we will securely dispose of it in accordance with applicable laws and our data retention policies.

Extra rights for EU and UK individuals

You may request details of the personal information that we hold about you and how we process it (commonly known as a "data subject request"). You may also have a right in accordance with applicable data protection law to have your personal information rectified or deleted, to restrict our processing of that information, to object to decisions being made based on automated processing where the decision will produce a legal effect or a similarly significant effect on you, to stop unauthorised transfers of your personal information to a third party and, in some circumstances, to have personal information relating to you transferred to you or another organisation.

If you are not happy with how we are processing your personal information, you have the right to make a complaint at any time to the relevant Data Protection Authority based on where you live. We would, however, appreciate the chance to deal with your concerns before you approach the Data Protection Authority, so please contact us in the first instance using the details set out above in our Privacy Policy above.