

Castaway Privacy Policy

Updated: 1 September 2023

1. What is the purpose of this Policy?

- 1.1 Financier Software Pty Ltd (**Castaway, we, us, our**) offers services to its customers in the form of access to software, support, consulting and training and education programs. As part of this offering, Castaway may collect information about individuals (such as employees of its customers).
- 1.2 This Policy explains how we will collect, use, disclose and protect your personal information.
- 1.3 Castaway respects your right to privacy and is committed to safeguarding the privacy of our customers and website visitors. We adhere to the Australian Privacy Principles (**APPs**) contained in the *Privacy Act 1988* (Cth) (**Privacy Act**) and to the General Data Protection Regulation (**GDPR**) to the extent it is applicable. If you are an individual residing within the European Union, please refer to section 14 of this Policy.
- 1.4 In this Policy, "**personal information**" has the same meaning as in the Privacy Act. Generally, it includes all information that we hold about you where you are identifiable, or from which you could reasonably be identified.
- 1.5 By providing us with personal information, and/or continuing to access our software or our website, you consent to the terms of this Policy and the types of disclosure covered by this Policy.

2. Types of personal information

- 2.1 Castaway may collect certain personal information about you, including:
 - (a) your contact details, including your name, phone number, address and email address;
 - (b) your username for an account to access and use our software;
 - (c) your feedback, communications with our customer support and responses to surveys;
 - (d) other information that you provide to us in the course of our relationship with you;
 - (e) in respect of users of our software, details of the entity you work for;
 - (f) in respect of potential employees, contractors and other personnel (**Personnel**), your employment history, intended role with us and other information provided as part of any application.
- 2.2 Castaway also collects certain metadata regarding your use of our software and our website as set out in the section 12 below. This data may be associated with you.
- 2.3 Castaway may also aggregate some or all of the above information and derive new information from these data aggregations.
- 2.4 Castaway does not collect, handle or store your financial or credit card information. We use third party payment processors, currently Stripe and GoCardless, to assist in securely processing your payment information. We encourage you to read the privacy statements of the relevant payment processor to find out more about how they store and handle your payment information.

3. How we collect personal information

- 3.1 Castaway generally collects and stores personal information from you directly, including when you:
- (a) engage in business activities with us (whether electronically or in person);
 - (b) use our software or website, including when you create an account;
 - (c) enter information onto our website, our software or otherwise provide it to us;
 - (d) respond to surveys or promotions;
 - (e) communicate with our customer support or otherwise provide feedback;
 - (f) change your content or email preference; or
 - (g) apply to work for, or with, us.
- 3.2 We may collect personal information about you from third parties, including:
- (a) the entity you work for;
 - (b) in the case of potential Personnel, from conducting background checks or from your references; and
 - (c) from cookies on your own browser as set out in section 12.2 below.
- 3.3 If we do collect personal information about you from third parties, we will protect it as set out in this Policy.
- 3.4 You have the option to withhold your personal information, however, if you do, it may not be possible for us to provide you with our products and services or for you to fully access our website.
- 3.5 You must not provide us with your personal information if you are under the age of 18 without the consent of your parent or someone who has parental authority for you. We do not knowingly collect or use the personal information of children.

4. Use of your personal information

- 4.1 Castaway may use your personal information:
- (a) to provide you with our services and support resources, and information and updates to those services and support resources;
 - (b) to comply with our obligations under an agreement with you or the entity you work for;
 - (c) to respond to your inquiries and communicate with you, including by telephone, email, SMS or mail;
 - (d) to make you aware of new and additional products, services and opportunities available to you;
 - (e) to administer our business activities;
 - (f) to improve our products and services;
 - (g) to better understand your needs; and
 - (h) for any other purpose you expressly consent to.

- 4.2 As permitted by law, Castaway may contact you by a variety of measures including, but not limited to telephone, email, sms or mail.

5. Disclosure of your personal information

- 5.1 We may disclose your personal information to our employees, officers, insurers, professional advisers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this Policy.
- 5.2 We may from time to time need to disclose personal information to third parties:
- (a) when it is required for the delivery of our services;
 - (b) to comply with a legal requirement, such as a law, regulation, court order, subpoena, warrant, or in response to a law enforcement agency request;
 - (c) in the course of a legal proceeding;
 - (d) to protect the copyright, trademarks, legal rights, property or safety of Castaway, its customers or third parties;
 - (e) in good faith to a purchaser of our business, where there is a change of control in our business or a sale or transfer of our business assets. We may also need to disclose your personal information to a potential purchaser under an agreement to maintain confidentiality; and
 - (f) otherwise with your consent or as permitted by law.

6. International transfers of personal information

- 6.1 Personal information that we collect is stored securely in Australia. We may disclose information outside of Australia where we have a legal right to do so and to its group companies located overseas in the normal course of its business. Our policy is to comply with the requirements of the applicable laws which apply to cross border disclosure of personal information.
- 6.2 Where we disclose your personal information to a third party outside of Australia we will either:
- (a) ensure the recipient is subject to legal privacy obligations equivalent to the APPs which you can enforce; or
 - (b) contractually require the third party to comply with obligations equivalent to the APPs.

7. Security of your personal information

- 7.1 Castaway is committed to ensuring that the personal information you provide to us is secure. To help 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.
- 7.2 However, although we take measures to safeguard your personal information against unauthorised disclosures, we cannot guarantee that your personal information cannot be accessed or disclosed in a manner that is inconsistent with this Policy.
- 7.3 You acknowledge that personal information that you submit through our website or software may be available, via the internet, around the world, and that we cannot prevent the use (or misuse) of such personal information by others.

8. Access to your personal information

- 8.1 You may request a copy of the personal information that we hold about you in accordance with the provisions of the Privacy Act. A small administrative fee may be payable.
- 8.2 Please contact us at the address below to request a copy of the personal information which we hold about you.
- 8.3 You will need to prove your identity before we can provide you with a copy of your personal information.
- 8.4 We reserve the right to refuse to provide you access in certain circumstances set out in the Privacy Act.

9. Correction of your personal information

- 9.1 It is important that the personal information we hold about you is up-to-date and correct.
- 9.2 You should contact us at the address below if you believe that any personal information we hold is inaccurate, out of date, incomplete, irrelevant or misleading.
- 9.3 We will take such steps as are reasonable to correct the personal information we hold. In some circumstances set out in the Privacy Act we may refuse to do so. If so, you may ask for a statement regarding this point to be associated with your personal information.

10. Complaints about privacy

- 10.1 If you have any complaints about our privacy practices, please send details of your complaints to the address in section 13. We take complaints very seriously and will respond shortly after receiving written notice of your complaint.
- 10.2 Alternatively, or if you are not satisfied with our response, you can submit a complaint to the relevant authority. In Australia, this is the Office of the Australian Information Commissioner.

11. Changes to this Policy

- 11.1 Please be aware that we may change this Policy in the future. We may modify this Policy at any time, in our sole discretion and all modifications will be effective immediately upon our posting of the modifications on our website. Please check back from time to time to review our Privacy Policy.

12. Website

12.1 When you visit our website

- (a) When you come to our websites, (including www.castawayforecasting.com, www.castawaycloud.com and www.cloudcastaway.com and any other websites operated by us) we may collect certain information such as browser type, operating system, website visited immediately before coming to our site, etc.
- (b) This information is used in an aggregated manner to analyse how people use our site. We may also use this information to help us improve our service.

12.2 Cookies

- (a) We may from time-to-time use cookies on our website.
- (b) Cookies are small files which are used to identify repeat visits to a website or other application from a particular device and to store details about the use of the website from that device. Most web browsers automatically accept cookies but you can

choose to reject cookies by changing your browser settings. However, this may prevent you from taking full advantage of our website.

- (c) Our website may from time-to-time use cookies to analyse website traffic and help us provide a better website visitor experience. In addition, cookies may be used to serve relevant ads to website visitors through third party services such as Google Adwords. These ads may appear on this website or other websites you visit.

12.3 Third party sites

- (a) Our site and our software may from time to time have links to other websites not owned or controlled by us. These links are meant for your convenience only. Links to third party websites do not constitute sponsorship or endorsement or approval of these websites. Please be aware that Castaway is not responsible for the privacy practises of other such websites. We encourage you to read the privacy statements of each and every website that collects personal information.

13. Where can I go if I have a specific question?

If you need information about this Policy or Castaway's privacy practices; would like to make a complaint; or would like to request access to, or a correction of, your personal information, please contact us on:

Data Protection Officer (privacy@castawayforecasting.com)

or

Chief Operations Officer (coo@castawayforecasting.com)

Ph: +61 (0) 2 9569 7144

Suite 404/ 45 Lime St, SYDNEY NSW 2000

14. GDPR provisions

14.1 Application

- (a) This section 14 of this Policy applies in addition to the above sections if:
 - (i) you are an individual residing within the European Union (**EU**); and
 - (ii) Castaway processes information about you in connection with offering you goods or services or monitoring your behaviour.
- (b) To the extent of any discrepancy between this section 14 and the remaining sections of this Policy, this section 14 takes precedence.

14.2 General

- (a) Castaway complies with the principles of data protection set out in the GDPR for the purpose of fairness, transparency and lawful data collection and use.

14.3 Collection of personal information

- (a) Where we collect your personal information, we will only collect it:
 - (i) for a specific purpose; and
 - (ii) to the extent necessary for that purpose.
- (b) We do not collect or process any personal information from you that is considered 'sensitive' under the GDPR, such as personal information relating to your sexual

orientation or ethnic origin, unless we have obtained your explicit consent, or if it is being collected subject to and in accordance with the GDPR.

- (c) We will anonymise or delete your personal information once it is no longer reasonably needed for the purpose for which it was collected, or any additional purpose as permitted under this Policy or the GDPR.
- (d) We will ensure appropriate security of your personal information, including by using the measures set out in section 7 above.

14.4 Processing of personal information

- (a) We act as both a Processor and as a Controller (as defined in the GDPR) in respect of your personal information.
- (b) Castaway will only process your personal information:
 - (i) where we have a lawful basis on which to do so; and
 - (ii) to the extent necessary for the purpose(s) for which it was provided to us.
- (c) Depending on the personal information collected by Castaway and the reason for its collection, this lawful basis may include:
 - (i) those set out in section 4 of this Policy; and
 - (ii) for our legitimate commercial interests or legal obligations, including to comply with any agreement with you or the entity for which you work;
 - (iii) if it is necessary to protect your life or in a medical situation;
 - (iv) if it is necessary to carry out a public function or a task of public interest;
 - (v) if the function has a clear basis in law; or
 - (vi) another purpose with your consent.
- (d) Where we employ data processors to process personal information on our behalf, we only do so on the basis that such data processors:
 - (i) comply with the requirements under the GDPR; and
 - (ii) have adequate technical measures in place to help protect your personal information against unauthorised use, loss and theft.

14.5 Your rights under the GDPR

- (a) In accordance with the GDPR, you have the following rights:
 - (i) to be informed how your personal information is being used;
 - (ii) to access your personal information without charge to you;
 - (iii) to have your personal information transmitted to another controller;
 - (iv) to correct your personal information if it is inaccurate or incomplete;
 - (v) to delete your personal information (also known as "the right to be forgotten");
 - (vi) to restrict processing of your personal information during a complaint process;

- (vii) to retain and reuse your personal information for your own purposes;
 - (viii) where you have given your consent in relation to our processing of your personal information, to withdraw your consent at any time;
 - (ix) to object to your personal information being used; and
 - (x) to object against automated decision making and profiling.
- (b) Please contact us at the address set out in section 13 to exercise any of these rights.
- (c) We may ask you to verify your identity before acting on any of your requests.

14.6 **International transfers**

- (a) Personal information that we collect may from time to time be stored, processed in or transferred between parties or sites located in countries outside of the EU, including:
- (i) our website and software hosting facilities in Australia;
 - (ii) our suppliers and contractors in Australia; and
 - (iii) our offices and/or facilities in Australia.
- (b) Transfers to each of these countries will be protected by appropriate safeguards, which include one or more of the following:
- (i) the use of standard data protection clauses adopted or approved by the European Commission; and/or
 - (ii) the use of binding corporate rules, a copy of which you can obtain by contacting us at the address set out in section 13.