

Access Intell Pty Ltd – Privacy Policy

1. Introduction

Access Intell Pty Ltd operates a suite of digital Platforms designed for various online activities including, but not limited to, the control and management of trade applications (Access Approve), the lodgement of transactions including registration, modification and discharge of security interests on the Australian Personal Property Securities Register (Access PPSR), the visualisation, control and management of customer risk (Access Monitor) and general web based business information services accessed through its website/s.

Access Intell has adopted this Policy in accordance with the privacy law. This Policy outlines how Access Intell deals with Personal Information, which it collects in conjunction with the Platforms. Access Intell may also collect information about Individuals who do not use the Platforms. Capitalised words in this Policy are defined terms. Defined terms are explained at the end of this Policy.

2. Collecting information directly from people

Access Intell collects Personal Information directly when:

- an Individual contacts Access Intell by telephone, fax, email or another form of communication;
- an Individual gives Access Intell his or her information in person on a paper form;
- an Individual sends the Access Intell a message through SMS or a third party app;
- an Individual registers or subscribes for an account;
- the Platforms automatically captures Personal Information in content when Individuals interact with the Platforms;
- our server and analytics service logs details about website visits;
- location services, when switched on, capture Individuals' locations;
- our website places or retrieves a cookie on Individuals' devices;
- our website or server stores visitors' IP addresses.

3. Collecting information from third parties

Access Intell collects Personal Information about Individuals from third parties when:

- third parties give Access Intell access to files containing Personal Information;
- we conduct research on Individuals, including potential customers; and
- we retrieve data from the PPSR or from a government agency or third party.

4. Organisations using the Platforms

Access Intell provides the Platforms to Organisations, which use them as business and information management tools and for conducting transactions on behalf of their own customers or clients. Both Access Intell and the Organisations may collect Personal Information from Individuals, including when:

- Organisations collect information directly from Individuals using the Platforms;
- Organisations give Access Intell access to their files containing Personal Information; and
- Organisations enter or process information (such as notes or files) about Individuals using the Platforms.

5. Types of Information that Access Intell collects and holds

Using processes described in this Policy, Access Intell collects the following categories of Personal Information about Individuals:

- (Content) whatever Personal Information is included in content Individuals enter using the Platforms;
- (Identity Information) name, signature, date of birth, nationality, license & registration details, bank account details, family details, employment details, educational qualifications, usernames;
- (Contact Information) email address, social media profiles, telephone & fax number, third-party usernames, residential, Access Intell and postal addresses;
- (Internet Data) webpage views, IP address, referring web site addresses, location, browser type, operating system, domain name, access times and other data typically collected by analytics services like Google Analytics; and
- (PPSR information) information about and recorded in connection with PPSR security interests.

6. How Access Intell stores Personal Information

Access Intell holds and stores Personal Information using:

- (Storage Services) third party data storage services, including applications and software;
- (Access Intell Devices) devices operated by employees of Access Intell's business; and
- (Paper Files) printed paper and third party archival storage services.

7. Security

Access Intell will take reasonable precautions to protect Personal Information from unauthorised access. This includes measures to secure the Access Intell's physical facilities and electronic networks.

Access Intell secures Personal Information that it collects with credentials, passwords, pins, encryption, session expiry, firewalls, SSL network encryption, and through the use of reputable vendors.

For more information on security, please contact Access Intell using the details in the "contacting us" below.

8. Deletion procedures

Access Intell may continue to store Personal Information when users close their account with us but will delete information when required.

9. Why data is held, used and disclosed

Access Intell's handling of Personal Information includes holding, using and sometimes sharing the Personal Information so that we can:

- provide functionality within the Platforms;
- provide notifications and support;
- offer marketing and promotions, competitions, surveys and questionnaires;
- transact with Individuals and process payments;
- assess and improve the Platforms;
- provide secure access to the Platforms.

For more information on when Access Intell shares Personal Information, see below.

10. Handling of data

Some collection, holding, use and disclosure of information happens simply by virtue of Individuals and Organisations using the Platforms.

The purpose of the Platforms is to allow Access Intel, Organisations and Individuals to enter, manage and communicate information, including Personal Information, relating to the Australian Personal Property Securities Register and the registration, modification and discharge of Security Interests.

11. Disclosing Personal Information

Access Intell shares Personal Information with others in the following ways:

- facilitating the sharing of information about sales, inquiries and payments.
- processing transactions lodged by a user on the Platforms.

12. Service providers can access personal information

When Access Intell uses the services of companies that we work with to provide the Platforms, they may get access to the Access Intell's data, including Personal Information. Such third party services may include:

- (Government Agencies) Government agencies that administer the PPSR, the Australian Business Register or the registers of Australian companies, business names and organisations;
- (Hosting) Cloud and web hosting service providers;
- (SaaS) providers of software as a service;

- (Support) providers of IT support services, web and software development;
- (Data analytics) Google Analytics (see [<http://www.google.com/intl/en/policies/privacy/>])(<http://www.google.com/intl/en/policies/privacy/>);
- (Online payment) providers of online payment systems; and
- (Apple device functionality providers) Apple location services, Siri dictation, Apple Maps, Apple Notifications (see [<http://www.apple.com/au/privacy/>])(<http://www.apple.com/au/privacy/>)).

Access Intell will only share Personal Information with these and other third parties where authorised to do so or to the extent reasonably necessary to perform their functions.

These third parties may have their own privacy and security policies. For more information about this, please contact Access Intell using the details listed in the "contacting us" section below.

For information on disclosures to overseas recipients, see below.

13. Disclosing information overseas

The Access Intell may store or process some Personal Information overseas. Individuals may not have the same rights relating to their information when it is overseas as they would under Australian privacy law.

By providing Access Intell with Personal Information, Individuals consent to the transfer of their Personal Information to overseas recipients as contemplated by this privacy policy.

If Individuals consent to such transfer, Access Intell will not be accountable for overseas recipients' handling of their Personal Information.

14. Contacting us

Individuals may edit content and account details within the Platforms.

However, Individuals can also contact Access Intell using the details below if they want to access, correct or delete Personal Information or lodge a complaint.

Privacy Officer: admin@accessintell.com

Access Intell reserves the right to refuse access or correction where there are reasonable grounds for doing so, for example if providing access would be unlawful or would compromise the privacy of another person.

15. Complaints process

If Individuals have a complaint about privacy, they can contact Access Intell using the details listed above.

Access Intell will respond to complaints in writing within a reasonable period (usually 10 business days from the day we receive an email).

Access Intell will try to work with Individuals to resolve complaints entirely within 20 business days, although that period may be longer if it is reasonable to take longer given the nature of the complaint.

If Individuals are unsatisfied with our response, they may refer the complaint to the Office of the Australian Information Commissioner (<http://www.oaic.gov.au/>).

16. Amendment

Access Intell may amend the Privacy Policy at its sole discretion. Individuals that continue to use the Platforms after receiving notice from Access Intell of such an amendment, agree to be bound by the Privacy Policy as amended.

17. Definitions

Affiliate means a third party referrer appointed by Access Intell in respect of the Platforms.

Individual means a natural person.

Organisation means third party Organisations using the Platforms including Affiliates.

Personal Information means information about an Individual whose identity is apparent, or can reasonably be ascertained, from that information.

This includes information like names, telephone numbers, email addresses and physical addresses.

Platform means the software platform known as "the Platforms".

Policy means this document, drafted in accordance with the Privacy Act 1988 (Cth).

PPSR means the Australian Personal Property Securities Register.

Access Intell, we, us and our means Access Intell Pty Ltd ACN 628 252 880.

