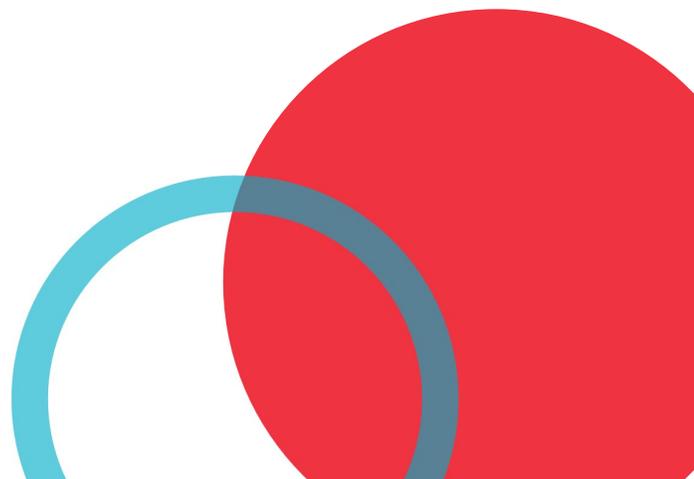




Privacy Policy





Version history

Version	Name	Date	Comments
1.0		12 March 2014	
2.0		13 September 2017	Overseas offices, business address update. Paragraph related to use of cookies included
3.0	Jonathan Drake	22 July 2021	Initial refreshed draft privacy policy
4.0	Lee-Anne Coleman	3 October 2023	Update of privacy guides based on new software product additions



Table of contents

About this document.....	4
1.0 - Purpose	4
2.0 - What information may be collected?	4
3.0 - How is the information used?	6
4.0 - acQure’s sharing of information and disclosure to third parties	7
5.0 - How is the information received and stored and for how long?	8
6.0 - Software that connects to the Internet	8
7.0 - Your rights and acQure contact details.....	8
8.0 - GDPR & POPIA Compliance	9
9.0 - Updates to this policy	9
10.0 - How to contact us	9



About this document

This Privacy Policy was revised and updated on 3rd October 2023.

1.0 - Purpose

This Privacy Policy is intended to help you to understand:

- What information may be collected by acQure;
- How the information is used;
- acQure's sharing of information and disclosure to third parties;
- How the information is received and stored and for how long; and
- Your rights and the contact details of acQure's privacy representative.

acQure Technology Solutions Pty Ltd ABN 59 009 333 644 (together with its subsidiaries and affiliates, "**acQure**") provides information management software and services to customers around the world. acQure is committed to protecting your privacy and to providing as secure a user experience as possible. This privacy policy explains our collection, use and disclosure practices for information provided to acQure including but not limited to: (i) via our website located at www.acquire.com.au (the "**Website**"); and (ii) in connection with your use of the acQure software including any mobile or cloud-hosted applications ("**the Software**") and any associated support, maintenance, hosting, product administration or other services (collectively "**Services**").

In this policy: (i) "**Personal Information**" means information that identifies you as an individual or that relates to an identifiable person (including juristic persons, as applicable under the POPIA); and (ii) "**Other Information**" means all other information that does not reveal your specific identity or does not directly relate to an identifiable person. Personal Information and Other Information are collectively referred to as "**Information**".

By accessing the Website, using the Software or Services, or otherwise providing information to acQure, you consent to the terms of this policy, which apply to information from or about you (including Personal Information). This consent is given on your own behalf and also on behalf of any person for whom you access the Website, use the Software or Services or otherwise submit information to acQure (such as your employer if you provide information to acQure during the course of your employment).

The acQure company that initially receives your information may differ by country, depending on where you are located. acQure Technology Solutions Pty Ltd (located in Australia) or any member of its group of companies that collects or receives information pursuant to this policy, is bound by and is entitled to the benefit of this policy.

A copy of this policy is available on the acQure website. An electronic (PDF) copy of this policy can also be obtained free of charge by contacting our Privacy Officer or Information Officer via the contact details at Section 10.0 below.

2.0 - What information may be collected?

Information that may be collected by acQure includes (but is not limited to):

- Information necessary to verify the integrity of the Software or Services and the validity of licences;
- Information used to market, sell, license, support or improve the quality, functionality, reliability and performance of the Software or Services (including information about the Software or Services that you use or may be interested in using);
- Account or payment information necessary for a transaction, to register you or your organisation in our systems, to administer support and maintenance or for tracking licence entitlements (this may include your or your organisation's name, address, telephone number, e-mail address, social media or messaging account ID and profile picture);
- Market research or other information we may request and/or you may supply from time to time in connection with the Software or Services, such as postings in message boards, forums, chats, profile



pages and blogs or social media tools used to provide, administer or enhance support and maintenance of the Software or Services;

- Information about you or your location or language, such as details required to activate or configure location-based features in the Software; and
- Other information, such as browser, network and device information, Software usage data; data about the devices on which you access the Software and information collected through cookies, pixel tags and other technologies;

2.1 – Personal Information - We collect Personal Information to the extent necessary for us to deliver the Software or Services, to provide any assistance or information that you request from us, or where collection of the Personal Information is otherwise required or authorised by law or this policy. Instances where Personal Information may be collected include:

- When we provide the Software or Services to you;
- During your use of the Website, Software or Services (including Software Usage Information);
- When you contact us with a request for information about the Software or Services, or for technical support or other assistance (information relating to your request may be recorded to assist our support or customer relationship management efforts);
- When you otherwise knowingly provide Personal Information to us (for example, during in-person meetings, or via written (including email), telephone or other methods of communication);
- When dealing with certain government agencies or departments; and
- When required by law.

acquire generally only collects Personal Information directly from you, however acquire may collect Personal Information from third parties with your consent or as otherwise authorised by law. Additionally, acquire may automatically collect or process certain items of Personal Information (such as your Internet domain or IP address) as part of the operation of the Website.

In some instances, we may combine Other Information with Personal Information (such as combining your name with your geographical location). If we combine any Other Information with Personal Information, the combined information will be treated as Personal Information in its entirety, for as long as it is combined.

We do not knowingly collect sensitive Personal Information from you (such as tax file or social security numbers, information related to racial or ethnic origin, political opinion, religion or other belief, health, biometric or genetic characteristics, criminal background, professional background or trade union membership). We request that you do not disclose any sensitive Personal Information to us, whether via the Website or otherwise.

2.2 - Consent - When we collect Personal Information from you, we will take such steps that are reasonable in the circumstances to ensure that you are aware of:

- our contact details;
- the purpose(s) for which the Personal Information was collected;
- any legal requirement on our part to collect the Personal Information;
- your rights to access the Personal Information we have collected; and
- the possible consequences of us not disclosing Personal Information when required to do so.

We will request your express consent to collect, use or disclose your Personal Information, except in circumstances where collection, use or disclosure without your express consent is authorised or required by law or this policy. We may assume your consent in cases where you voluntarily provide information for a particular purpose. We may not be able to provide the Software or Services (or otherwise assist you) if you are unwilling to consent to the collection, use or disclosure of your Personal Information. You may withdraw consent to the use and disclosure of your Personal Information at any time, unless the Personal Information is necessary for us to fulfill our legal obligations.

2.3 - Software Usage Information – We may use certain technologies that cause the Software to generate and transmit to us statistics and other information (including, without limitation, metadata produced as a result of



your use of the Software) about the performance, operation and your use of the Software. This information may include Personal Information and is collectively referred to in this policy as “**Software Usage Information**”. Examples of Software Usage Information (by way of illustration only) may include:

- computer registry settings and environment variables, Software modules installed and Software configuration, specification or session files;
- Software licensing information;
- Screen shots of the Software when in use;
- Performance information, such as how quickly the Software responds and the number and frequency of problems the Software experiences;
- Usage information, such as the features that you use and how frequently you launch the Software;
- Your user profile information – name, company, title, job, phone numbers, email, to the extent this has been entered into the Software;
- The IP address of your computer;
- Your computer system settings and configuration such as operating system, number of processors, CPU speed, RAM used and available, video card type, display screen resolutions, hard drive space, operating system version, how many network connections you use, hardware ID (including manufacturer, device name and version), host name, ethernet ID, hard drive serial number, windows user, domain, installed web browsers and versions, regional and language settings; and
- Any step-by-step description you give of what you were doing when an error or other problem occurred.

We may, subject to this policy, utilise one or more third parties to process Software Usage Information on our behalf.

2.4 - Collection of Other Information - We and our service providers may collect Other Information in several ways, including:

- Through your browser or device: Certain information is collected by web browsers or automatically through your device. We use this information to ensure that the Website (and, where applicable, the Software) continues to function properly and that the service we provide to you is not compromised.
- Use of cookies: A cookie (also known as a HTTP cookie) is a small piece of data sent from a website to your web browser. Your browser will store this cookie and return it to the website server when you browse pages on the website. Cookies are used to remember the ‘state’ of activities performed on the website. The Website only uses “session cookies”. These cookies will expire at the end of your browsing session. acQure only uses these cookies to ensure a consistent experience while using the Website. acQure does not use these cookies for tracking, marketing or advertising. Further to this, we do not use permanent cookies or flash cookies as part of our Website service. You have the right to “opt out” of the use of cookies on the Website to identify you. To prevent the use of cookies on the Website, please follow the instructions of your web browser.

3.0 - How is the information used?

acQure may use the information that we collect to deliver the Software and Services, and for the following additional purposes or as otherwise permitted or required by law:

3.1 - Customer Support – We use information to diagnose Software problems and provide software support and maintenance services to customers who have support and maintenance agreements in place. In this regard we may disclose your information to our distributors or to your or your organisation’s support partners to facilitate customer support or product improvement. We also use information, including Personal Information, to administer your or your organisation’s account and to complete and fulfil purchases.

3.2 - Product Improvement – We use information to continually improve the Software and Services, including debugging and adding new features or capabilities. For example, we use error reports to improve the stability of the product and usage information to determine what new features to prioritise. We may also use information to detect, and protect against, emerging and evolving threats to users or to user data (such as malware or spam).



We may use and analyse information, such as your Software Usage Information, in an anonymised way for statistical purposes to learn about the usage of the Software.

3.3 - Security, Safety and Dispute Resolution – We use information to protect the security and safety of the Software and our customers, to detect and prevent fraud, piracy or unauthorised use, to confirm the validity of Software licences, to determine if the Software being used is genuine and to resolve disputes. We also use your information in order to execute, administer, manage and enforce any agreements we may have with you, including to send administrative information (for example, notices regarding any changes to our terms, conditions and policies), or to enable us to comply with any legal obligations. We may disclose your information to fraud-checking or anti-counterfeiting organisations or agencies.

3.4 - Communications – We use information we collect to communicate with you and to personalise our communications with you. For example, we may contact you by phone or email or other means to inform you when a defect is fixed, discuss your licensing needs, let you know when security updates or new releases are available, update you or inquire about or respond to a support, service or information request, invite you to participate in a survey, tell you that you need to take action to keep your licensing active or tell you about acQuire Software or Services that may be of interest to you. Where required by law, acQuire will make available and implement an ‘unsubscribe’ option in marketing communications we may send you, and acQuire will otherwise comply with applicable anti-spam laws.

3.5 - Other – Your information may also be used for legal, regulatory and statistical purposes or to provide localised or personalised features or functionality in or via the Software. We may also process and use your information for our internal business purposes such as data analysis, audits, identifying usage trends, determining the effectiveness of marketing campaigns and operating and expanding our business activities generally. We may also use your information for any other purposes identified when the information is collected.

3.6 - Software Usage Information – We may: (i) make Software Usage Information publicly available in a form that does not identify you or any individual, provided that such Software Usage Information does not incorporate your or your organization’s confidential information; and (ii) use such Software Usage Information for acQuire’s internal business purposes worldwide, including without limitation for security and operations management, to create statistical analyses, for research and development purposes, to study customer behaviours and usage of the Software, to enhance our product offerings, and to provide more targeted applications and communications to our customers. To the maximum extent permitted by law, we retain all right, title and interest (including without limitation all intellectual property rights) in and to such Software Usage Information.

4.0 - acQuire’s sharing of information and disclosure to third parties

acQuire is a global group of companies that operates in multiple international jurisdictions. Information you provide or which is gathered via the Website, Software or Services may be shared amongst, processed and used by acQuire Technology Solutions Pty Ltd in Australia, or any member of its group of companies worldwide. To the extent that these entities have access to your Personal Information, they will follow privacy practices no less protective than the practices described in this policy, to the maximum extent permitted by law.

We may disclose your information to law enforcement and national security agencies, and other government and regulatory authorities as required or authorised by law.

acQuire’s policy is not to rent, sell, trade or otherwise disclose your Personal Information to other companies or individuals outside the acQuire corporate group unless: (i) we have obtained your explicit consent; (ii) we use trusted businesses or persons to support us in providing our services to you or your organisation in which case such third parties are subject to agreements that oblige them to process the information only on our instructions and in compliance with this policy or the laws that apply to the relevant acQuire entity and appropriate confidentiality and security measures; or (iii) the law requires us to do so or we have a good faith belief that disclosure of such information is reasonably necessary to protect the rights, property or safety of acQuire, its customers, employees, visitors or the public. We will ensure that third parties do not use your Personal Information for purposes other than those described in this policy or otherwise permitted by law.

Where we receive your information in connection with the support or maintenance of Software that you or your organisation has licensed from an acQuire distributor or other support provider, or where acQuire otherwise acts as a subcontractor to your provider, you consent to acQuire disclosing your information to that distributor or provider, either to facilitate the provision of support Services to you or your organisation, or to update or inform them of the direct information transmission between you and acQuire relating to such Services.



We may store and process your Personal Information in any country in which any relevant acQure group entity or our third-party hosting, cloud or information systems providers maintain facilities.

5.0 - How is the information received and stored and for how long?

We will exercise all commercially reasonable efforts to ensure that your information is treated in accordance with this policy and to prevent the loss, misuse, unauthorised access, modification or disclosure of your information. While no security measure can provide a guarantee against compromise, we regularly review and update our security measures in an effort to provide appropriate security for all information held by acQure. Once received, we restrict access to your Personal Information to acQure employees (or third-party supplier personnel) who require access to that information in order to provide to Software or Services, or to take those other actions described above in this policy. All acQure employees and third-party supplier personnel are bound by a duty to keep your Personal Information reasonably safeguarded against unauthorised use or disclosure.

Where we store the information you provide on computer systems, we do so on systems with limited access and which are located in controlled facilities. However, you acknowledge that the transmission of information over wireless or wired networks and the internet is not inherently secure and no data transmission or storage system can be completely secure, so no absolute guarantee of security or privacy can be given and acQure cannot warrant that others will not intercept or access your information transmitted to or stored by acQure via or in connection with the Website, Software or Services. Neither acQure nor any of its third-party service providers accepts any liability whatsoever as a result of transmission of your Personal Information (including any errors, delays or failure in transmission) via the internet or other unsecure network. acQure may use third-party cloud, hosting or data-processing services to receive, process or store information received from you.

If you suspect that any interaction with acQure or information covered by this policy is no longer secure, please notify us immediately via the contact details at Section 10.0 below.

acQure will retain your information only for as long as is necessary to do so, to fulfil the purposes for which the information was collected or for other legitimate legal or business purposes, unless a longer retention period is required by law in terms of an agreement, or there is a lawful purpose to retain your information for a longer period. acQure reserves the right to delete your information at any time and without notice. acQure uses appropriate security measures when destroying or permanently de-identifying Personal Information, when it is no longer required for the purposes for which we are authorised to use it.

6.0 - Software that connects to the Internet

The Software (or an update or upgrade to it) may cause your computer to connect to the internet without notice to communicate with acQure or an acQure service to validate licences, to provide certain functionality, to validate digital certificates, to check for updates or to register, activate or reactivate the Software. This policy applies to information collected by the Software in this manner. Where required, failure to register or activate the Software may result in reduced functionality.

6.1 - Linked Websites - We may provide links to third-party websites (for example, for social networking and the hosting of videos, podcasts and other media, or to administer events or conduct surveys) whose privacy practices may differ from ours. Since we do not control these websites, we encourage you to review the privacy statements posted on these third-party sites. acQure is not responsible for the privacy policies or practices of websites and services controlled by companies or organisations other than acQure. The inclusion of a link on the Website does not imply an endorsement of the linked website or service by acQure or its affiliates.

7.0 - Your rights and acQure contact details

We make every reasonable effort to ensure that your Personal Information is up-to-date, accurate and complete. We rely on you to notify us if there is a change to your Personal Information – You have the right to review your Personal Information received by acQure pursuant to this policy, to request corrections if it is inaccurate or outdated, to provide any complaints or feedback with respect to this policy and to request deletion or destruction in case you are no longer using the Software (or the purposes described above for collecting the Personal Information no longer apply).

You may direct any queries or complaints to acQure by contacting our Privacy Officer or Information Officer via the contact details at Section 10.0 below.



8.0 - GDPR & POPIA Compliance

The *General Data Protection Regulation 2016/679* ("GDPR") was introduced during May 2018 in the European Economic Area ("EEA"). If and to the extent that acQuire collects, processes and uses your Personal Information subject to the GDPR, acQuire relies on its legitimate interests as described in this policy as a lawful basis for collecting, processing and using your Personal Information. acQuire is classified as a "Data Controller" for the purposes of the GDPR.

South Africa's *Protection of Personal Information Act 4 of 2013* ("POPIA") came into effect on 1 July 2020. POPIA was drafted from the former European Data Protection Directive and the GDPR. POPIA aims to give effect to each person's right to privacy by introducing measures to ensure that all Personal Information is safeguarded when it is processed, and POPIA regulates the collection, dissemination, use and retention of Personal Information by Responsible Parties. acQuire is classified as a "Responsible Party" for the purposes of POPIA, and this would be the equivalent to a Data Controller under the GDPR.

Many rights arising under the GDPR and POPIA are addressed elsewhere in this policy (for example, your rights to access, correct or restrict processing of your Personal Information, or to have your Personal Information deleted). However, if you are located within the EEA then you may have additional rights arising under the GDPR, including but not limited to rights regarding data portability (to transfer your Personal Information to another company or organisation) and to lodge a complaint with a supervisory authority in your country of residence.

If you are a resident of the EEA and believe that we maintain your Personal Information subject to the GDPR, then you may direct any queries or complaints to acQuire by contacting our Privacy Officer or Information Officer via the contact details at Section 10.0 below.

9.0 - Updates to this policy

Please note this policy will change from time to time. We expect most such changes to be minor, but there may be changes that are more significant. If any change may materially and negatively affect the privacy of your Personal Information, then we will use reasonable efforts to inform you about such changes, such as by posting an updated version on the Website. It is important that you check from time to time and ensure that you have reviewed the most current version of this policy. Your use of the Software following any such changes will mean that you accept the revised policy.

10.0 - How to contact us

Please contact acQuire if you have any queries about the information that acQuire holds about you or the way we handle that information. Our contact details for privacy queries are set out below.

Privacy Officer

acQuire Technology Solutions Pty Ltd

Level 4, The Atrium,

168 St Georges Terrace

Perth WA 6000 Australia

E: privacy@acquire.com.au

P: + 61 8 9316 6600

F: + 61 8 9316 6699

Information Officer (South Africa):

Alison Atkins, Chief Executive Officer

E: privacy@acquire.com.au

P: +27 11 268 2355