



Privacy Policy

Last Updated: August 11, 2025

QualiKoala ('we', 'us', or 'our') is committed to protecting your privacy. This Privacy Policy explains how we collect, use, store, and disclose your personal information when you use the QualiKoala web application and services ('QualiKoala' or the 'Service'). It also outlines the choices you have regarding your personal information. We respect your privacy and comply with applicable laws and regulations regarding personal information, including the Australian Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs), the EU General Data Protection Regulation (GDPR), and other relevant global privacy laws.

By accessing our website or using our Service, you consent to the collection and use of your information as described in this Policy. If you do not agree with this Privacy Policy, please do not use QualiKoala. We may update this Privacy Policy from time to time (see the 'Updates to This Policy' section below). We encourage you to read this Policy carefully and contact us if you have any questions.

1. Scope of this Privacy Policy

This Privacy Policy applies to all users of QualiKoala, including both Account Owners (businesses/organisations) and Authorised Users (individuals invited to a business's team), as well as visitors to our website. It covers personal information collected through our web application, website, and any related interactions (for example, customer support or marketing communications).

Please note: QualiKoala integrates with certain third-party services such as Xero (accounting software) and Stripe (payment processing) to provide our features. This Privacy Policy does not cover third-party services that you may connect with QualiKoala or access through our Service. For example, if you integrate your Xero account, the data within Xero is also subject to Xero's privacy policy; similarly, payments processed via Stripe are subject to Stripe's privacy practices. We encourage you to review the privacy policies of any third-party services you use in connection with QualiKoala.

2. Information We Collect

We only collect personal information that is reasonably necessary to provide and improve our services, communicate with you, or as otherwise required by law. The types of information we collect fall into several categories:

2.1 Information You Provide to Us Directly

Account and Profile Information: When an organisation registers for QualiKoala, we collect information about the Account Owner such as company name, industry, business contact name, email address, phone number, and billing details. Individual users (either account owners or team members invited) provide personal information when creating a profile, such as name, email address, phone, job title/role, and potentially an avatar or photo (optional). If you are an Account Owner inviting others, you will provide their name and email to send the invite (please ensure you have the individual's permission to do so).

Compliance and HR Information: QualiKoala's core purpose is to store compliance-related credentials and personal data. This may include identification and work eligibility data such as date of birth, address, gender, employment start date, and employee ID. It also includes compliance documents and certifications (e.g., professional licenses, training certificates, IDs) that you upload or record on the platform for each team member. Furthermore, QualiKoala is designed to handle tax and superannuation information for Australian compliance needs. This can include an individual's Tax File Number (TFN), superannuation fund name and membership number, Australian Business Number (ABN) for contractors or businesses, and related data needed for regulatory compliance. We treat TFN information with extra care (see Section 5 Security & Compliance).

Financial and Payment Information: If you subscribe to a paid plan, we (through our payment processor Stripe) collect billing information. This includes your payment card details (cardholder name, card number, expiry, CVC) entered via Stripe's secure checkout, and billing contact name and address. QualiKoala itself generally does not store your full credit card number; we store a payment token and basic transaction records. We may also maintain records of your purchases and payment history with us.

Communications: If you communicate with us (for example, via email support requests, chat, or phone), we will collect the information you provide in those interactions. This may include your contact details, the content of your communications, and any attachments or screenshots you send us. We use this to assist you and improve our Service.

Survey, Feedback and Marketing Information: From time to time, we might ask users to participate in surveys or provide feedback. If you choose to respond, you may provide personal opinions or additional profile information which we will collect along with your responses. If you sign up for newsletters or marketing communications, we will collect your name, email, and preferences.

Optional Integrations Data: If you actively choose to integrate or import data from other systems (e.g., by connecting QualiKoala to Xero or uploading a CSV file), we will collect any data you direct us to import. For instance, through the Xero integration, we may receive accounting or payroll data from your Xero account - such as your organisation's name and address, employee or contractor details (names, emails, addresses, employment dates, TFNs if stored in Xero, etc.), and possibly relevant accounting entries (e.g., invoices or categories related to compliance expenses). We only import the data needed for QualiKoala's functionality, and any such imported data is treated like other User Data under this Policy.

2.2 Information We Collect Automatically

When you use QualiKoala, our systems and third-party analytics providers may automatically collect certain technical information about your device and usage of the Service:

- **Log and Usage Data:** Our servers automatically record information when you access the Service, including: the IP address of your device, the type of browser and device you use, the pages or screens you visit, the dates/times of access, time spent on pages, and actions you take (such as uploading a document or updating a record). This log data may also include error reports or crash diagnostics if the app encounters an issue. Note that IP addresses may be used to infer your approximate location (country or region) but not your exact address.
- **Device and Software Data:** We may collect information about the device you use to access QualiKoala (e.g., PC, tablet, smartphone), such as the operating system and version, device model, unique device identifiers, and system language. If using a mobile device, we might collect mobile network information and device identifiers (but our app is web-based, so primarily we see browser user-agent strings).
- **Cookies and Similar Technologies:** We use cookies and similar tracking technologies (like web beacons or local storage) on our website and in the web app. Cookies are small text files stored on your browser. They help us recognize you, remember your preferences, and analyse usage of our Service. For example, we use authentication cookies to keep you logged in, and analytics cookies (like

those from Google Analytics) to understand how users navigate through QualiKoala. We may also use cookies to track aggregate usage and web traffic routing on our site. You can control cookies through your browser settings - for instance, you can choose to block or delete cookies - but note that some parts of our Service might not function properly if you disable essential cookies. (For more details, see our Cookie Policy if available.)

- **Do Not Track:** At this time, our website does not respond to 'Do Not Track' signals from browsers. However, we limit our use of trackers to those outlined in this Policy and do not use your data for third-party advertising profiling.

2.3 Information Collected from Third Parties

Besides data you provide directly and automatically collected data, we may obtain information about you from third-party sources in the following scenarios:

- **Integration Partners:** If you connect third-party services to QualiKoala, those services may send us information as authorised by you. For example, as mentioned, connecting Xero will let us pull accounting or employee data from your Xero account; connecting a payroll system (if we offer such integration in the future) could provide us with employee tax or super details; connecting Stripe for billing provides us confirmation of your payments. We collect and use this information in line with the purpose of the integration - to populate your QualiKoala account and save you from re-entering data. We do not receive data from these partners unless you actively enable the connection.
- **Account Owner (for Team Members):** If you are an individual being added to QualiKoala by an Account Owner (e.g., your employer), that organisation might provide us with some of your personal information to set up your user account. For instance, your employer could give us your name, work email, and perhaps other details like job title or employee ID. Similarly, they may upload documents or data about you (such as a training record or license number) into the platform. In such cases, we treat that data in accordance with this Privacy Policy, but please note that the Account Owner is responsible for having the right to share your information with us. We act as a data processor for the Account Owner with respect to that content.
- **Public or Other Sources:** We generally do not collect personal information from public databases or third-party data brokers. However, if you register for QualiKoala using a federated identity provider (for example, signing in via Google or Microsoft), we may receive basic profile info from those services (like your name and email) to facilitate account creation. Also, if we need to verify certain

professional credentials for compliance (potential future feature), we may, with your consent, confirm details with the issuing authority or database.

We will not collect or use any sensitive personal information (such as racial or ethnic origin, political opinions, health information, etc.) unless it is directly relevant and you have provided it or consented. The main sensitive data we anticipate handling are TFNs and possibly union membership for super funds, which we safeguard diligently (see Security section below).

3. How We Use Your Information

QualiKoala uses the collected information for the following purposes, and we ensure that we have a valid legal basis for each use (whether it be your consent, fulfillment of a contract, compliance with a legal obligation, or our legitimate interests such as improving our services):

- **Providing and Operating the Service:** We use personal information to set up and maintain your account, to provide the features of the QualiKoala platform, and to facilitate the day-to-day functionality you expect. For example, we use team members' data to populate compliance registers and dashboards, to send reminders about expiring certifications, and to generate compliance reports. Tax and superannuation data is used to help businesses manage those details for employees (and we might integrate it into generating forms or reports for compliance purposes in the future). Essentially, all the data you input, or import is used in context to deliver the Service back to you.
- **Authentication and Security:** Your login credentials and identifiers are used to authenticate you when you log in and to keep your account and data secure. We also use information like device/IP and log data to detect and prevent fraudulent or unauthorised access to accounts.
- **Communicating with You:** We use your contact information (email, phone if provided) to send essential service-related communications. This includes transactional emails (e.g., confirmations of account creation, subscription receipts, trial expiration notices), notifications you configure (e.g., an email alert to a team member that a certificate is about to expire), and administrative messages (like changes to our terms or privacy policy, security alerts, or support communications). We may also respond to your inquiries or support requests using your contact info. If you have opted in to marketing communications, we will use your email to send newsletters or product updates, but you can opt out at any time (see Marketing Communications below).

- **Improving and Developing the Service:** We want to make QualiKoala better. To do so, we analyse how users interact with our app. We might use aggregated usage data and feedback to identify trends, usage patterns, and areas for improvement. For instance, we might look at what features are most used or where users encounter errors, so we can focus development effort accordingly. We may also use data (including possibly de-identified or aggregated compliance data) to develop new features or industry insights. Any analytics or research we perform with user data will typically be on anonymized or aggregated information, not on information that personally identifies you, unless necessary internally to troubleshoot an issue.
- **Compliance and Legal Obligations:** We may process personal information to comply with our legal obligations. For example, maintaining accurate financial records of our subscribers (which includes personal data on invoices) for tax and accounting laws, or using TFN data only as allowed under taxation laws. If required by law enforcement or government authorities (and if lawful), we might use or disclose certain data as described in Section 4 (Disclosures) below. We also keep information as needed to exercise, establish, or defend legal claims.
- **Protecting Our Service and Users:** We use information to enforce our Terms of Service and to protect the rights, property, or safety of QualiKoala, our users, and the public. For instance, we might review logs to investigate a violation of acceptable use (like someone scraping data or attempting to hack) and use personal identifiers in doing so. If necessary, we will use data to prevent potentially prohibited or illegal activities, and to screen for or combat undesirable or abusive activity.
- **Third-Party Integration Functionality:** When you enable integrations (e.g., pulling data from Xero or processing a payment through Stripe), we use your information to facilitate those requests. That might mean sending a minimal set of data to the other service or parsing the data received from them into our database. For example, if you connect to Xero, we use your Xero authentication token to periodically fetch updated data from Xero so that QualiKoala stays in sync (such as new employees added in Xero). We use imported Xero data to populate corresponding fields in QualiKoala (like employee contact info or tax data), streamlining your experience. Similarly, when Stripe processes your credit card, we handle the response (success/failure) and update your subscription status accordingly, using minimal personal data in transit (mostly the Stripe customer ID rather than raw card info).
- **Marketing and Customer Relationship Management (CRM):** If you are a prospective customer who provided details (e.g., requesting a demo or signing up for a newsletter), we may use your information to contact you about our

Service, send you promotional materials, or follow up on your interest. For our existing users, with your consent or as permitted by law, we might send occasional product announcements or offers. We will always provide a way for you to opt out of marketing emails. We do **not** sell your data to third parties for advertising. If we ever display testimonials or case studies that include user personal information, it will only be with consent.

Legal Bases for Processing (GDPR): If you are in a jurisdiction that requires a legal basis for processing personal data (such as the EU under GDPR), our legal bases include: Contractual necessity (to provide you the service you signed up for), legitimate interests (for improvements, security, and business operations, balanced with your rights), consent (for optional uses like marketing or certain data sharing - you can withdraw consent any time), and legal obligation (where we need to comply with laws). Where we rely on legitimate interests, we will ensure our interests are not overridden by your data protection rights.

4. When We Disclose or Share Information

QualiKoala understands the importance of keeping your information private. We do not sell or rent your personal information to third-party advertisers or unrelated parties. We share personal data only in the following circumstances:

- **Service Providers ('Processors'):** We use trusted third-party companies to help us operate and improve QualiKoala. These service providers (also known as subprocessors) may process personal data on our behalf and under our instructions, and they are bound by confidentiality and data protection obligations. Examples include: cloud hosting providers (Supabase and Vercel) that store our databases and serve our web app; email delivery services that send verification or notification emails; customer support platforms that manage support tickets; analytics services that help us understand app usage; and Stripe, which processes payments. We share with these providers only the information necessary for them to perform their services for us. For instance, if we use an email service, it will get your email address and the content of emails to send to you; our cloud host stores all data but has no authorization to view it; Stripe receives billing info to process transactions. A list of our key subprocessors can be provided upon request. All service providers are required to handle your data securely and only for the purposes we specify.
- **Team Members and Account Owners:** If you are using QualiKoala as part of an organisation's account, some of your information will be visible to other authorised users in that organisation. For example, if you are an employee whose

data is being managed on QualiKoala, your manager or admin within the platform will see your profile information and compliance records. Team members within the same company account may see each other's names, roles, and possibly certification status if the account settings allow. This sharing is controlled by the account's permissions and the intended design of the software (it's intrinsic to the Service's functionality - e.g., a compliance officer user can view all employees' compliance records on their dashboard). We only present this information internally to your organisation's users - it is not public or visible to users from other organisations. If an Account Owner chooses to share or export data (say a compliance report to an external auditor), that is at their discretion and outside of our direct control (though still facilitated by the Service upon their request).

- **Third-Party Integrations at Your Request:** When you authorise us to integrate or share data with a third-party application, we will share information as needed to fulfill that integration. For example, if you click an 'Export to Xero' button (hypothetically, if we provide that feature) or otherwise allow QualiKoala to send data into Xero, we will transmit the relevant data (like an invoice or contact record) to Xero's systems via their API. Similarly, connecting to a training provider might involve us sending a user identifier to that provider to fetch training completions. We will only do this with your direction and consent. Note that once data is transferred to a third-party service, that service's privacy policy governs their use of it. We encourage you to review any integration partner's policies - we are not responsible for the data once it's under a third party's control, apart from our ensuring we send it securely and only what's necessary.
- **Business Transfers:** If QualiKoala (or its owning company) is involved in a merger, acquisition, sale of assets, or reorganisation (including in bankruptcy or insolvency proceedings), your data may be transferred to the successor or acquiring entity as part of that transaction. We will ensure that any such entity is bound by terms that are at least as protective of your privacy as this Policy, and we will provide notice to users before personal information becomes subject to a different privacy policy due to a business transaction. You would have the opportunity to discontinue using the Service or request deletion of your data if you do not agree with the new handling of your information.
- **Legal Compliance and Protection:** We may disclose personal information when we believe in good faith that such disclosure is necessary to: (a) comply with a law, regulation, or compulsory legal request (such as a court order, subpoena, or government demand); (b) enforce or apply our Terms of Service or other agreements; (c) investigate or assist in preventing illegal activities, suspected fraud, or security issues; or (d) protect the rights, property, or safety of

QualiKoala, our users, or others. If we receive a law enforcement request for user data, we will carefully review it for legality and necessity. Whenever allowed, we will inform the affected user before disclosing their information so they may object or seek legal protection, except in emergency situations or where prohibited by law.

- **With Your Consent:** Other than the cases listed above, we will share your personal information with third parties only if you have given us consent to do so. For instance, if you want us to feature your success story on our blog or share your contact with a partner for a specific offer, we will explicitly ask for your permission. You have the right to withdraw such consent at any time.

Importantly, we do not share your personal information with third parties for their own direct marketing purposes (e.g., we don't sell email lists, and we won't hand off your data for someone else to advertise to you). We also do not engage in any 'selling' of personal data as defined under the California Consumer Privacy Act (CCPA) - we do not provide personal data to third parties in exchange for money or equivalent value.

If we ever need to share information in a manner not covered above, we will explain it to you at the point of collection or obtain your consent.

5. International Data Transfers

QualiKoala is an Australian-based service, but we use cloud infrastructure that may be located in various countries. Additionally, we serve users globally, which means your data may be accessed from wherever you use our Service. By using QualiKoala, you acknowledge that your personal information may be transferred to and stored in countries other than your own. These countries may have data protection laws that are different or less stringent than those in your jurisdiction.

Specifically, our primary data storage may occur in data centres outside Australia (for example, in the United States or the European Union, depending on our cloud providers' offerings). Our service providers (such as analytics or email services) might also process data in the US, EU, or other locations. Regardless of where data is processed, we take measures to ensure your personal information remains protected.

If you are located in the European Economic Area (EEA), United Kingdom, or Switzerland and your data is transferred outside that area, we will implement appropriate safeguards as required by the GDPR and related regulations. This may include using Standard Contractual Clauses (SCCs) or other approved transfer mechanisms to

ensure that personal data is afforded a high level of protection. For example, our agreements with US-based service providers often include SCCs to cover data transfers from the EU to the US. We also rely on the fact that some of our providers are certified under frameworks like the EU-U.S. Data Privacy Framework (if applicable) or have binding corporate rules.

For users in other regions (such as Asia or the Americas), by using our Service or providing us with information, you consent to the transfer of your personal data to Australia and other jurisdictions as described in this Policy. We will handle that information as described here, and in compliance with Australian privacy laws, which are generally consistent with international standards.

We ensure that any international transfers of personal data comply with the privacy laws that apply. If an international transfer is required by a legal obligation (for example, in response to a foreign legal process), we will only comply if such transfer is permitted under applicable laws.

If you have questions about our data transfer mechanisms or require more information about international transfers, please contact us (see Contact section).

6. Data Security and Storage

We take reasonable and appropriate steps to protect personal information from misuse, interference, loss, and unauthorised access, modification or disclosure. We have implemented a range of security measures:

- **Encryption:** All data transmitted between your device and our servers is encrypted using SSL/TLS (Secure Sockets Layer/Transport Layer Security) protocols. This ensures that any personal information (like login credentials or sensitive data you input) is protected from eavesdropping while in transit. Additionally, our database and storage utilise encryption at rest provided by our cloud providers, adding a layer of protection for stored data. In the near future, for especially sensitive fields (such as TFNs or financial identifiers), we plan to implement application-level encryption or hashing, meaning those values would be stored in a further encrypted form in our database.
- **Secure Infrastructure:** We host QualiKoala on reputable cloud platforms (Supabase, Vercel) with strong security practices and certifications (such as ISO 27001 or SOC 2). Our servers are in controlled facilities with measures like firewalls, network monitoring, and redundancy. We apply security updates and patches regularly to our software and third-party libraries to address

vulnerabilities. We also conduct periodic security reviews and threat assessments on our application.

- **Access Controls:** We limit internal access to personal information strictly to those employees, contractors, and service providers who need that access to perform their job (for example, customer support personnel may need to view account data to assist you, but they would not need to access sensitive financial info). All such personnel are bound by confidentiality obligations. We implement authentication controls (strong passwords, two-factor authentication where appropriate) to prevent unauthorised access to admin accounts. We also ensure that our personnel are trained on data security and privacy requirements.
- **Organisational Policies:** We have internal policies to safeguard user data. This includes data handling guidelines, incident response plans, and regular auditing of who has access to what. We require any third-party contractor who might assist us (e.g., a developer debugging an issue) to also adhere to high standards of data protection. When we test our software, we use anonymized data sets or dummy data to avoid using real personal information in non-production environments.
- **Backups:** We perform regular backups of our database to prevent data loss. These backups are encrypted and stored securely. In case of any data integrity issue or accidental deletion, we can restore from backup to recover user data. Backup data is protected with the same care as live data and is only retained for the necessary duration.
- **Monitoring:** Our systems log access and actions in the application. We monitor these logs for any unusual or suspicious activity. Automated alerts may notify us of things like multiple failed login attempts or other signs of potential intrusion, so we can respond promptly.
- **Penetration Testing:** From time to time, we may engage independent security experts to perform penetration testing or code reviews on our application, to identify and fix vulnerabilities. We also encourage responsible disclosure of vulnerabilities by security researchers (you can contact us if you believe you have found a security issue, and we'll address it promptly).

Despite all these precautions, it is important to note that no method of transmission over the Internet or method of electronic storage is 100% secure . We cannot guarantee absolute security of your data. However, we continuously update and improve our security measures to meet or exceed industry standards. In the unlikely event of a data breach that affects your personal information, we will notify you and the appropriate authorities as required by law. For instance, under Australian law, we comply with the

Notifiable Data Breaches scheme which may require us to notify the Office of the Australian Information Commissioner (OAIC) and affected individuals of certain data breaches that are likely to result in serious harm. Similarly, if required under GDPR or other laws, we will follow those notification rules.

User Responsibilities: You also play a role in keeping your data secure. Please use a strong, unique password for your QualiKoala account and do not share it. Update your password immediately if you suspect any unauthorised access. Also, be aware of phishing - QualiKoala will never ask you for your password via email, and you should only log in at our official website. If you're an Account Owner, manage your team members' access and permissions wisely and promptly remove access for people who no longer should have it.

7. Data Retention and Deletion

We retain personal information only for as long as necessary to fulfill the purposes for which it was collected, or as required by law or legitimate business needs.

In practice, this means:

- As an active user of QualiKoala, the data associated with your account will be kept for the duration of your use. Compliance data often needs to be retained for certain periods (for example, businesses might need to keep employee records for several years under employment or tax laws). We generally do not delete important records from your account unless you direct us to, as long as your account is active.
- If you delete certain information through the Service (for example, remove a document or edit a field), the change will be reflected immediately in the live system. However, our backup systems might still have a copy of the original information for a limited time until those backups cycle out. We also maintain logs (with possible personal identifiers) for security and audit purposes; these logs are typically retained in a secure manner for a short period unless required longer.
- If you or the Account Owner choose to delete an individual's profile or if an employee leaves and is removed, we mark that data for deletion or archiving. We might retain a minimal record (e.g., name and dates of use) if needed for audit trails in the company's account, but all personal details and documents can be deleted by the Account Owner.

- **Account Deletion:** If an Account Owner requests account deletion (for instance, the company stops using QualiKoala and asks for all data to be deleted), we will process that promptly once any active subscription term is concluded or upon final confirmation. Deleting an account will remove personal information of the Account Owner and all associated team member data from our active databases. We will also instruct our service providers to delete any personal data they are processing for us, to the extent required. However, we may retain certain information after account deletion for legitimate reasons:
 - **Legal and Compliance:** We might keep invoicing records or payment transaction records which contain personal data (billing contact, company name, etc.) to comply with tax law or auditing requirements (often for 5-7 years, depending on jurisdiction).
 - **Backup Retention:** As noted, our encrypted backups may still have fragments of your data until those backups expire (typically within 30-60 days). We ensure such backups are stored securely and eventually destroyed/overwritten.
 - **Dispute Resolution:** If there is an ongoing issue, dispute, or investigation involving your account (for example, a legal claim or a fraud incident), we may retain relevant information until it is resolved.
 - **Statistical Data:** We may retain de-identified or aggregated data (which no longer identifies any individual or organisation) for analytical purposes. For example, overall stats like ‘number of certifications tracked’ or ‘average time to onboard a user’ may be derived from user data but won’t contain personal info. This helps us improve our services without compromising privacy.

When personal information is no longer needed, we will take reasonable steps to destroy it or anonymize it. Secure deletion practices are used - for digital data, this could mean secure erasure; for any physical records (though unlikely in our case as we are digital) it would mean shredding or secure disposal.

If you are an individual user and leave an organisation that was using QualiKoala, your employer (the Account Owner) might decide to retain your records in their account for compliance history, or they might delete your profile. That data remains under the control of the Account Owner in that sense; however, if you have concerns, you can contact us or the Account Owner to discuss removal or anonymization of your data.

8. Your Rights and Choices

Depending on your jurisdiction and the applicable data protection laws, you have certain rights regarding your personal information. QualiKoala is committed to upholding these rights. Below is a summary of various rights you may have and how you can exercise them:

- **Access and Correction (Australia & general):** You have the right to request access to the personal information we hold about you and to request correction of any inaccuracies. For example, if you want to know what data is on your profile or you believe your date of birth or contact info is wrong, you can request that we correct it. In many cases, you can directly view and edit your personal details by logging into your QualiKoala account (e.g., updating your profile). For anything you cannot change yourself, you may contact us (or your Account Owner's admin) to assist. We will respond within a reasonable time and, if we refuse access or correction (which might only happen in limited circumstances allowed by law, such as if giving access would unreasonably impact others' privacy or if we are prevented for legal reasons), we will explain why and how you can complain about that refusal.
- **Data Portability (GDPR):** If you are in the EU/EEA (or where similar rights apply), you may have the right to obtain a copy of certain personal data in a structured, commonly used, machine-readable format, and to request that we transfer it to another controller where technically feasible. For example, you could ask for a copy of your core profile and compliance records in a CSV or JSON format to port to another system. We will facilitate this as much as possible, either through an export feature in the app or upon request.
- **Right to Deletion (Right to be Forgotten):** You can request that we delete your personal information, and we will do so, provided we do not have a valid legal reason to keep it. As outlined in Data Retention, if you ask to delete your account or data, we will remove your personal data from active use. However, certain data may be retained as required (e.g., invoices) or as allowed (backups, logs) by law. If you're an employee user and want your data removed, we might need to coordinate with the Account Owner (your employer) because they may have their own lawful basis to retain your info. We'll work with all parties to honour deletion requests to the fullest extent.
- **Right to Object or Restrict Processing:** In some jurisdictions, you have the right to object to our processing of your personal information or ask us to restrict processing. For instance, if we were using your data for direct marketing, you can object (and we will stop). If you contest the accuracy of data or have some issue with how we're processing it, you can request a restriction (meaning we just store it but don't do anything with it) until the issue is resolved. Under GDPR, you can

object to processing based on legitimate interests in certain cases. We will evaluate such objections and comply unless we have compelling legitimate grounds to continue or it's needed for legal claims.

- **Consent Withdrawal:** If we rely on your consent for any part of processing (e.g., for sending marketing emails), you can withdraw that consent at any time. Withdrawing consent will not affect the lawfulness of processing we conducted based on consent before its withdrawal. If you withdraw consent for a certain purpose, we will stop the processing for that purpose. For example, you can unsubscribe from marketing emails via the link in the email or by contacting us, and we will stop sending them.
- **California Privacy Rights (CCPA/CPRA):** If you are a California resident, you have rights to know what categories of personal information we collect, the categories of sources, the business purpose, the categories of third parties we share with, and specific pieces of info we have about you. This Policy is intended to provide much of that detail. You also have the right to request that we delete your personal information (subject to similar exceptions as mentioned above). Additionally, California users have the right to opt-out of 'sale' of personal info - as noted, we do not sell personal data. If in the future we considered anything that might be deemed a sale, we would provide a mechanism to opt out. California law also gives you the right not to be discriminated against for exercising your privacy rights. We honour that - e.g., if you choose to exercise deletion, we won't deny you services unless the data was necessary for the service.
- **Other Jurisdictions:** If you are in other countries (e.g., New Zealand, Canada, etc.), similar rights to access, correct, delete, etc. may apply under those countries' laws. We aim to extend the spirit of these rights to all users, even if not legally required in every jurisdiction. You can always reach out to us with privacy-related requests.

How to Exercise Your Rights: The easiest way to exercise many rights is by logging into your account and using in-app settings (for updating info or using any export feature we provide). For other requests, you can contact us by email at hello@qualikoala.com.au or in writing to our mailing address provided below. Please clearly state what right you wish to exercise and provide relevant details. We may need to verify your identity before fulfilling certain requests (to ensure we don't give your data to someone else). For instance, we might ask you to confirm some identifying details or log in to your account as verification.

We will respond to requests within a reasonable timeframe and in accordance with

applicable law. For GDPR-related requests, that's typically within 30 days (can be extended by 60 more days for complex requests; we would inform you if so). For CCPA, within 45 days (can extend another 45 if needed). There is generally no fee for making a request, but if requests become excessive or manifestly unfounded, we reserve the right to charge a reasonable fee or refuse, as allowed by law.

Note for Team Member Data: If you are an individual whose data is being handled by QualiKoala on behalf of your employer (Account Owner), you may also direct requests to the Account Owner. Because in many cases, they are the data controller determining how your data is used in the platform, we may forward your request to them or coordinate with them when appropriate (for example, if you ask us to delete your data but your employer is required to keep it, we'll communicate that back).

We will help facilitate communication and ensure that data subjects can exercise their rights fully.

9. Cookies and Tracking Technologies

As mentioned in the Information Collection section, QualiKoala uses cookies and similar technologies on our website and web app. Here we provide a bit more detail on these technologies and your choices:

Cookies: A cookie is a small file placed on your device. We use the following types of cookies:

- *Essential Cookies:* These are necessary for the Service to function properly. For example, when you log in, we set an authentication cookie, so you remain logged in as you navigate between pages. Without it, the Service would not recognize you and you'd have to log in for every action. Essential cookies also help with security (e.g., to keep track of sessions and prevent hijacking).
- *Preference Cookies:* These cookies remember your preferences, such as language selection or other customizations, so we can provide a personalized experience.
- *Analytics Cookies:* We use these to collect information about how users interact with our Service. For instance, we might use Google Analytics or a similar tool to see aggregated stats like which pages are most visited, how long users spend, what path they take through the app, etc. This helps us improve usability and troubleshoot issues. The information collected is typically in aggregate form and not intended to identify individuals. Google Analytics, for example, might set cookies to distinguish users and throttle request rates. (Google's ability to use

and share information collected by Google Analytics about your visits is governed by their terms and privacy policy.)

- *Functionality Cookies:* Some cookies enable extra functionality, like keeping track of certain choices or enabling support chat features.
- *Third-Party Cookies:* Currently, QualiKoala's use of third-party cookies is minimal and largely confined to analytics or embedded content. We do not allow third-party advertising networks to set cookies through our site.

If we ever implement additional tracking (such as for marketing analytics or A/B testing), we will update our Cookie Policy accordingly.

Web Beacons and Pixels: In our emails or on our site, we might use tiny graphics (clear GIFs or pixel tags) that have unique identifiers to track things like whether an email was opened or whether a certain page was viewed. This helps us gauge the effectiveness of our communications and features. These beacons typically work in conjunction with cookies.

Your Choices: When you first visit our website, you may see a cookie notice or banner if required by law (like in EU). You can choose to accept or decline non-essential cookies. Regardless, you can also manage cookies via your browser settings. All major browsers allow you to block or delete cookies. Please note that if you disable cookies entirely, some parts of QualiKoala (especially the web app after login) may not function correctly, since essential cookies are needed for login sessions.

For analytics cookies, some providers offer direct opt-outs. For example, Google provides an opt-out mechanism for Google Analytics (a browser add-on). If you'd like more information on how to opt out of Google Analytics, you can visit Google's site.

We do not use cookies to serve targeted advertising, and we currently do not respond to 'Do Not Track' signals, as there is no consistent industry standard for compliance. We will reassess this if a standard emerges.

10. Marketing Communications

We may send you information about new features, tips on using QualiKoala, or promotions if you have opted in to receive marketing communications. Typically, when you sign up for QualiKoala, we will ask if you want to receive newsletters or updates. If you say yes (or if you sign up via our website specifically for a newsletter), we will use your contact information to send you those communications.

Examples of marketing communications include: a periodic newsletter with product updates, an announcement of a new integration or service plan, or an invitation to a QualiKoala webinar or event. We try to keep these relevant and not too frequent.

Opting Out: If you prefer not to receive marketing or promotional emails, you have the right to opt out. You can do so by:

- Clicking the ‘unsubscribe’ link in any marketing email you receive from us, which will remove you from our mailing list.
- Adjusting your preferences in your account settings (if we provide such an option in the user profile or settings).
- Contacting us at any time at hello@qualikoala.com.au to request removal from marketing lists.

Please note that even if you opt out of marketing emails, we may still send you transactional or service-related emails that are necessary for our relationship. For example, we will still send account statements, important notices about the Service, password reset emails, and other critical communications.

We do not engage in telephone or SMS marketing at this time. If that changes and you provided a phone number for that purpose, we would seek separate consent as required.

We will not share your contact information with third parties for their own marketing without your explicit consent.

11. No Sensitive Info Requirement / No Legal or Health Advice

We do not ask you to provide any personal information that is not relevant to the Service. Please refrain from submitting any highly sensitive personal data to QualiKoala outside the intended scope (for example, do not upload personal medical records, personal financial account passwords, or other unrelated sensitive documents into the platform). While our system is secure, keeping the data scope limited to what’s needed for compliance management helps protect everyone’s privacy.

QualiKoala is not a platform for personal social networking or broad data storage - it’s specifically for compliance and qualifications data. We also do not intentionally collect information about anyone’s race, ethnicity, religious or philosophical beliefs, union

memberships (except possibly inherent in super fund details if it's a union fund), sexual orientation, or health information. Please avoid storing such data in free-text fields unless absolutely necessary for compliance reasons.

If you believe we have inadvertently collected sensitive info or you have provided it by mistake, contact us so we can handle it appropriately (e.g., deletion).

Additionally, our Service might provide guidance or templates for compliance, but it is not providing legal advice or health advice. Any guidance should be verified with appropriate professionals. This is just a privacy policy note that we're not soliciting those kinds of personal health or legal case details.

12. Third-Party Websites and Links

QualiKoala's website or application may contain links to third-party websites or services that are not operated by us (for example, a link to an official government compliance resource, a link to Xero's site for OAuth, or a community forum). This Privacy Policy does not cover those external sites. If you click a link to a third-party site, you will be directed to that third party's website. We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

We encourage you to review the privacy policy of every site you visit or service you use, especially when leaving our platform. If you interact with any third-party content or integrations through QualiKoala (like using a Google authentication, or a YouTube video embedded in a help article), those third parties may receive some data as per their own cookies or interactions. We try to minimize such sharing and will clarify where it happens.

13. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technologies, legal requirements, and other factors. If we make material changes to this Policy, we will give you notice by appropriate means: for example, by email (to the address associated with your account) or by posting a notice on our website or in the application. We will also update the 'Last Updated' date at the top of this Policy.

Any changes will be effective when the revised Policy is posted, unless stated otherwise. In cases where required by law, we will obtain your consent to significant changes. For instance, if a change would materially affect how we handle your personal data in a way that requires consent, we will do so.

Your continued use of QualiKoala after the effective date of the updated Privacy Policy will constitute your acknowledgment of the changes and agreement to abide and be bound by the modified Policy. If you do not agree with the changes, you should stop using the Service and may request deletion of your data.

We encourage you to periodically review this page for the latest information on our privacy practices.

14. Contact Us

If you have any questions, concerns, or requests regarding this Privacy Policy or how we handle your personal information, please contact us at hello@qualikoala.com.au.

We will do our best to respond promptly and resolve any issues. For security and privacy reasons, we may need to verify your identity before answering certain requests (especially those about accessing or deleting data).

Complaints: If you believe we have breached this Privacy Policy or applicable privacy laws, please contact us as soon as possible at the email or address above with full details of your complaint. We will investigate and respond to you within a reasonable time. If you are not satisfied with our response, you may escalate your complaint to the relevant data protection authority. For example:

- In Australia, you can contact the Office of the Australian Information Commissioner (OAIC).
- In the European Union, you can contact your local Data Protection Authority.
- In New Zealand, the Office of the Privacy Commissioner.
- In California, the California Privacy Protection Agency.

We genuinely appreciate your feedback and the opportunity to resolve any issues directly.

Thank you for trusting QualiKoala with your compliance management needs. We are dedicated to keeping your data safe and respecting your privacy at every step of our journey together.