Privacy policy

We're committed to protecting the privacy of all individuals that provide Personal Information to us, This Privacy Policy explains how we collect, protect, use and share your personal information.

We may review and change this policy from time to time. When we do, we'll update this version located at <u>https://www.FindMI.com.au/privacy/</u> and notify our customers within FindMI, and in other suitable places.

Let's go through a few definitions before we get started:

- 'Central Data Networks', or 'Central Data Networks Pty Ltd (ABN 33 065 604 622)', is us—the company behind FindMI.
- **'FindMI'** is the FindMI software application and services related to it that don't have a separate privacy policy.
- 'Agreement' refers to the FindMI Terms of Service found at <u>https://www.FindMI.com.au/terms/</u>.
- **'Customer'** is a user of FindMI who has agreed to our Terms of Service.
- 'Personal Information' means information that can identify an individual.
- **'Services'** means the provision of the FindMI software application and related platform, and services related thereto (such as customer support).

Personal Information we collect

We collect personal data in a couple of different ways—directly and indirectly.

Personal Information we collect directly from you

We directly collect Personal Information if you send an enquiry to us from our website, use FindMI, or get in touch with us by chat, email, or phone. We may also collect some Personal Information if you engage with us through social media.

This information can include your name, gender, date of birth, country of birth, addresses, telephone numbers, email addresses, and credit and banking details.

We do not directly collect any special categories of personal data about you. This includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data. Nor do we collect any information about criminal convictions and offences.

Personal Information we collect indirectly

We indirectly collect Personal Information when someone uses FindMI to record data about someone other than themselves. A typical scenario would be when a healthcare professional login details for a colleague.

This information can include names, email addresses, a person's emergency contacts, health insurance numbers

Browser and hardware data, such as type of device, operating system, browser type, as well as the versions of the above-mentioned services.

- **Cookie and tracking technology data**, which would include pages visited, time spent on pages, and other anonymous traffic data.
- **Transaction data**, including details about your FindMI subscription, payment dates, and renewal dates.

How this information is used

Generally speaking, the Personal Information we collect is used by us to operate FindMI.

The Personal Information we collect about our own Customers is mostly used for billing, identification, authentication, and for contacting them if we need to.

We may, with consent, use email addresses to share news, tips, updates and special offers. People who receive these promotional emails can unsubscribe at any time.

Our use of data collected in FindMI by a business or practitioner that is Personal Information relating to third parties is limited to providing support and technical assistance to our Customers.

We may use other data for a range of different purposes, provided we comply with applicable law and our contractual commitments. In some countries (for example, European Economic Area countries), local legal regimes may require us to treat some or all of other data as "personal data" under applicable data protection laws. Where this is the case, we will process other data only for the same purposes as "personal data" under this Privacy Policy.

Other ways we may use your Personal Information:

- To deliver customer service and assist you with any inquiries you may have.
- To analyze trends, administer or optimise FindMI, monitor usage or traffic patterns (including to track users' movements around FindMI) and gather demographic information about our user base as a whole.
- **To control unauthorised use or abuse of FindMI**—or otherwise detect, investigate or prevent activities that may violate our policies or be illegal.

How information is disclosed

Except as described in this Privacy Policy, FindMI will not share, sell, or rent Personal Information with anyone without your permission or unless ordered by a court of law.

The security of your Personal Information

We take security seriously. Data is encrypted, stored in state-of-the-art facilities, access is restricted to those who have a need to know, and we regularly review our technology to maintain security.

In the event that there is a breach and your Personal Information that we have collected directly is at risk, you will be notified within 72 hours of discovering the breach. You will be informed of what information is at risk, steps that we have taken to ensure your safety, and what action we are taking or have taken to rectify the breach. To the extent permissible at law, in the event that there is a breach and indirectly collected information is at risk, we will follow the same protocol, however the affected Customers (rather than the individuals) will be notified instead.

More about security can be found at https://www.FindMl.com.au/security.

Access, correct or delete Personal Information about you

You can request **access to the Personal Information** you have provided to us, via email to privacy@FindMl.com.au. This enables you to receive a copy of the data and to check that we are lawfully processing it.

If you think there's a problem with the Personal Information we hold about you, you will either have the tools available to make these changes, or you can **request a correction.** This enables you to have any incomplete or inaccurate data we hold about you corrected (though we may need to verify the accuracy of the new data you provide to us).

If you want to **request erasure of your Personal Information**, we'll take all reasonable steps to do so unless we are required to keep it for legal reasons, which will be notified to you, if applicable, at the time of your request. As we only collect information that is required, it is likely that revoking your consent will limit the functionality of your FindMI account.

Data controlled by our Customers

FindMI's Customers may submit information to the Services for hosting and processing purposes ("Customer Data"). FindMI will not review, share, distribute, or reference any such Customer Data except as provided in FindMI's Terms of Service (<u>https://www.FindMI.com.au/terms/</u>), or as may be required by law. In accordance with FindMI's Terms of Service, FindMI may access Customer Data only for the purpose of providing the Services, or preventing or addressing service or technical problems, or as may be required by law.

FindMI acknowledges that you have the right to access your personal information. If personal information pertaining to you as an individual has been submitted to us by a FindMI customer and you wish to exercise any rights you may have to access, correct, amend, or delete such data, please inquire directly with our customer. We have limited access to data our customers submit to our Services, if you wish to make your request directly to FindMI, please provide details of the FindMI Customer who submitted your data to our Services. We will refer your request to that Customer, and will support them as needed in responding to your request.

Local access and privacy laws

FindMI is a worldwide service, and we acknowledge that Personal Information may be subject to access and privacy laws in the country of residence of those patients.

We'll take all reasonable steps to comply with local access and privacy laws, to the extent consistent with legal obligations we have under Australian law, where we are based.

Questions or complaints

If you have any questions or complaints about our Privacy Policy or the way we handle your Personal Information, you can contact us at privacy@FindMl.com.au. This is our preferred method of contact.

We also have a dedicated Data Protection Officer to help you with any requests or questions you have about your data. They can be reached at <u>dpo@FindMI.com</u>.au.

Last updated: 30/08/2024