

## Privacy Policy

At CareApp, we take privacy very seriously. We have updated our privacy policy (Policy) to ensure that we communicate to you, in the clearest way possible, how we treat personal information. We encourage you to read this Policy carefully. It will help you make informed decisions about sharing your personal information with us. These words when used in this privacy policy have the following specific meanings: APPs means the Australian Privacy Principles in the Privacy Act. Health information means information or an opinion about your health or any disability you may have now or previously, your expressed wishes about the future provision of health services to you, other personal information collected to provide or in providing a health service to you, or in connection with the donation of your organs or certain genetic information about you in a form that is or could be predictive of yours or a relative's health. Personal information means information or an opinion about an identified individual or an individual who is reasonably identifiable: (a) whether the information or opinion is true or not; and (b) whether the information or opinion is recorded in a material form or not, personal information includes sensitive information. Privacy Act means the Privacy Act 1988 (Cwth). Sensitive information means information or an opinion about your racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health information, genetic information other than health information, biometric information for automated verification or identification purposes and biometric templates. We, our, or us means CareApp Group Pty Ltd, trading as CareApp ACN 6166 483 58 of 44 Tutt Avenue Kingswood SA 5062. You or your means clients, relatives of clients, employees, service providers, contractors, prospective contractors, students on work placement with us, volunteers, job applicants and any other individuals who we come into contact with.

CareApp is a Care Communication platform that fosters care relationships by empowering carers and engaging families with quick, intuitive and easy to use software. The Service involves the storage of Data about a company or individual.

That Data can include personal information. "Personal information" is information about an individual, (from which their identity is apparent or can reasonably be determined). This information can include names, dates of birth, email addresses, home and work addresses, telephone numbers, photographs and health information. We will collect such information by lawful and fair means and not in an unreasonably intrusive way. It can also include such information (where applicable) about a Community, for which a CareApp profile has been created ("Community").

CareApp may collect personal information directly from you when you:

- register to use the Service
- use the Service
- contact the CareApp support team
- visit our Website

You can always choose not to provide your personal information to CareApp, but it may mean that we are unable to provide you with the Service. CareApp may receive personal

information from you about others through your use of the Service. CareApp may also collect information from you about someone else. If you provide CareApp with personal information about someone else, you must ensure that you are authorised to disclose that information to us and that CareApp is not required to take any further steps applicable to data protection or privacy laws. CareApp may collect, use and disclose such information for the purposes described in this Policy. This means that you must take reasonable steps to ensure the individual concerned is aware of and/or consents to the various matters detailed in this Policy, including the fact that their personal information is being collected, the purposes for which that information is being collected, the intended recipients of that information, the individual's right to obtain access to that information, CareApp's identity, and how to contact CareApp. Where requested to do so by CareApp, you must also assist CareApp with any requests by the individual to access or update the personal information you have collected from them and entered into the Service. CareApp collects, holds, and uses your personal information for limited purposes.

CareApp collects your personal information so that we can provide you with the Service and any related services you may request. In doing so, CareApp may use the personal information we have collected from you for purposes related to the Services including to:

- verify your identity
- administer the Service
- notify you of new or changed services offered in relation to the Service
- carry out marketing or training relating to the Service
- assist with the resolution of technical support issues or other issues relating to the Service
- comply with laws and regulations in applicable jurisdictions, and
- communicate with you.

By using the Service, you consent to your personal information being collected, held and used in this way and for any other use you authorise. CareApp will only use your personal information for the purposes described in this Policy or with your express permission. The Application is protected by a secure and encrypted password that each User must choose themselves. Users should never share their passwords. CareApp is not responsible for any loss of data or breach of privacy if a User shares their password with someone else. We do not store your password on our servers. It is your responsibility to keep your password to the Service safe. You should notify us as soon as possible if you become aware of any misuse of your password, and immediately change your password within the Service or via the "Forgotten Password" process.

By using the Service, you agree that CareApp can access, aggregate and use non-personally identifiable data CareApp has collected from you. This data will in no way identify you or any other individual. CareApp may use this aggregated non-personally identifiable data to:

- assist us to better understand how our customers are using the Service
- provide our customers with further information regarding the uses and benefits of the Service

- enhance small business productivity, including by creating useful business insights from that aggregated data and allowing you to benchmark your business' performance against that aggregated data, and
- otherwise to improve the Service.

CareApp holds your personal information on servers located in Australia. We use top tier, third party data hosting providers' (Microsoft Azure) to host our Services on servers located in Australia. Each data hosting provider's role is limited to providing a hosting and storage service to CareApp and we have taken steps to ensure that our data hosting providers do not have access to, and use the necessary level of protection for your personal information. They do not control and are not permitted to access or use your personal information, except for the limited purpose of storing the information. This means that, for the purposes of Australian privacy legislation and Australian users, CareApp does not currently "disclose" personal information to third parties located overseas. CareApp is committed to protecting the security of your personal information and we take all reasonable precautions to protect it from unauthorised access, modification or disclosure.

Your CareApp Group Pty Ltd personal information is stored on secure servers that have SSL Certificates issued by leading certificate authorities and all Data transferred between you and the Service is encrypted. However, the Internet is not in itself a secure environment and we cannot give an absolute assurance that your information will be secure at all times. Transmission of personal information over the Internet is at your own risk and you should only enter, or instruct the entering of, personal information to the Service within a secure environment. We will advise you at the first reasonable opportunity upon discovering or being advised of a security breach where your personal information is lost, stolen, accessed, used, disclosed, copied, modified, or disposed of by any unauthorised persons or in any unauthorised manner. CareApp will only disclose the personal information you have provided to us to entities outside the CareApp group of companies if it is necessary and appropriate to facilitate the purpose for which your personal information was collected pursuant to this Policy, including the provision of the Service. CareApp will not otherwise disclose your personal information to a third party unless you have provided your express consent. However, you should be aware that CareApp may be required to disclose your personal information without your consent in order to comply with any court orders, subpoenas, or other legal process or investigation, if such disclosure is required by law. Where possible and appropriate, we will notify you if we are required by law to disclose your personal information.

You may request access to your personal information. It is your responsibility to ensure that the personal information you provide to us is accurate, complete and up-to-date. You may request access to the information we hold about you, or request that we update or correct any personal information we hold about you, by setting out your request in writing and sending it to us at [support@careapp.com.au](mailto:support@careapp.com.au). CareApp will process your request as soon as reasonably practicable, provided we are not otherwise prevented from doing so on legal grounds. If we are unable to meet your request, we will let you know why. For example, it may be necessary for us to deny your request if it would have an unreasonable impact on the privacy or affairs of other individuals, or if it is not reasonable and practicable for us to process your request in the manner you have requested. In some circumstances, it may be

necessary for us to seek to arrange access to your personal information through a mutually agreed intermediary.

We'll only keep your personal information for as long as we require it, for the purposes of providing you with the Service. However, we may also be required to keep some of your personal information for specified periods of time, for example under certain laws relating to provision of health services.

In providing the Service, CareApp utilises "cookies". A cookie is a small text file that is stored on your computer for record-keeping purposes. A cookie does not identify you personally or contain any other information about you but it does identify your computer.

We and some of our affiliates and third-party service providers may use a combination of "persistent cookies" (cookies that remain on your hard drive for an extended period of time) and "session ID cookies" (cookies that expire when you close your web browser). This maybe to track overall site usage, and track and report on your use and interaction with ad impressions and ad services. You can set your browser to notify you when you receive a cookie so that you will have an opportunity to either accept or reject it in each instance. However, you should note that refusing cookies may have a negative impact on the functionality and usability of the Website. We do not respond to, or honour "Do Not Track" requests at this time.

You can opt-out of any email communications CareApp sends which may relate to product information, Service updates and Service notifications to you via email. Our emails will contain clear and obvious instructions describing how you can choose to be removed from any mailing list not essential to the Service. CareApp will remove you at your request. You are responsible for transfer of your data to third-party applications. The Service may allow you, the Subscriber, or another Invited User within the relevant subscription to the Service to transfer Data, including your personal information, electronically to and from third-party applications. CareApp has no control over, and takes no responsibility for, the privacy practices or content of these applications. You are responsible for checking the privacy policy of any such applications so that you can be informed of how they will handle personal information.

CareApp has a privacy complaints process if you wish to complain about how we have handled your personal information, please provide our Privacy Officer with full details of your complaint and any supporting documentation:

- by e-mail at [support@careapp.com.au](mailto:support@careapp.com.au), or
- by letter to The Privacy Officer, CareApp Group Pty Ltd, Level 2, Flinders @ Tonsley, 1284 South Road, Tonsley SA 5042

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Our Privacy Officer will endeavour to:

- provide an initial response to your query or complaint within 10 business days, and
- investigate and attempt to resolve your query or complaint within 30 business days or such longer period as is necessary and notified to you by our Privacy Officer.

This policy may be updated from time to time. CareApp reserves the right to change this Policy at any time, and any amended Policy is effective upon posting to this Website. CareApp will make every effort to communicate any significant changes to you via email or notification via the Service. Your continued use of the Service will be deemed acceptance of any amended Policy.