

PRIVACY POLICY

Formento Pty Ltd (ABN 44 700 664 106) (**we, us or our**) is committed to protecting your privacy. This policy explains how we collect, use and protect your personal information. It applies to all personal information we handle, whether we collect it through our website, in person, or through other means.

For individuals located in the European Economic Area (**EEA**), United Kingdom or Switzerland: Additional rights and protections apply to you under the General Data Protection Regulation (EU) 2016/679 (**GDPR**) and, for UK residents, the UK General Data Protection Regulation (as incorporated into UK law) and the Data Protection Act 2018 (**UK GDPR**). Please refer to Appendix 1 at the end of this policy for information specific to your additional rights and how we process your personal information in accordance with GDPR and UK GDPR requirements.

Quick overview

- We collect information you provide to us and information we gather when we interact with you
- We use this information to provide our services and improve your experience
- We protect your information using secure systems and processes
- You have rights regarding your personal information, including access and correction rights

Information we collect

Identity and contact details

- Name, Business address, email address
- Professional details

Service related information

- Payment and transaction details for products and services you've purchased from us or enquiries about our products and services
- Your preferences for our services and your marketing preferences
- Feedback and survey responses

Digital information

- IP address and general location information derived from your IP address
- Search and browsing behaviour
- Website usage patterns
- Cookie preferences

Professional information (for job applicants and workers)

- Employment history
- Professional experience
- Required authorisations and licences
- Professional registrations
- Information about your right to work in the relevant jurisdiction

How we collect personal information

- **Directly from you when you:** interact with us, contact us, fill out forms.
- **Automatically when you:** visit our website, use our technologies, interact with our online services.
- **From third parties:** service providers, business partners, public sources, government organisations and organisations or people authorised by you.

- **From publicly available sources:** such as ASIC and other regulatory bodies and professional networking sites such as LinkedIn.

Why we collect, hold, use and disclose personal information

We collect and use your personal information to run our business and provide our services as set out below.

Business operations

- To manage our relationship with you as a customer or supplier
- To process and deliver our products and services
- To handle your inquiries, support requests, and communications
- To maintain accurate records for billing and administration

Client onboarding and verification

- To assess whether to take you on as a new client or provide services to you, including performing anti-money laundering, anti-terrorism, sanction screening, fraud and other background checks when required or permitted by law
- To retain records of verification checks as required by law

Communication and support

- To respond to your questions and support requests
- To communicate important updates about our services
- To handle inquiries made through our website or platforms
- To manage your participation in surveys, feedback sessions, or events

Service improvement

- To conduct analytics and market research
- To improve our business operations and services
- To develop and enhance our applications and platforms
- To understand how our services are used

Marketing and promotions

- To send you promotional information about our services and events
- To inform you about products or services that may interest you
- To manage your marketing preferences
- To run competitions, promotions, and special offers
- To provide additional benefits to our customers

Employment purposes

- To assess employment applications
- To evaluate candidate qualifications
- To manage professional certifications and licences
- To maintain employment records

Legal and compliance

- To comply with our legal obligations

- To respond to court orders or legal processes
- To maintain required business records
- To fulfill regulatory requirements or reporting obligations
- To protect our legal rights and interests or as authorised by law

Our disclosures of personal information to third parties

We may disclose personal information to:

Service providers

- IT service providers
- Data storage providers
- Web hosting and server providers
- Payment processors
- Marketing and advertising providers
- Analytics providers
- Identity verification and compliance screening service providers

Professional advisers

- Bankers
- Auditors
- Insurers and insurance brokers
- Legal advisers

Business partners

- Our existing or potential agents
- Our business partners or contractors

Corporate transactions

If we merge with or are acquired by another company, or sell our business assets:

- Your information may be disclosed to our advisers
- Your information may be disclosed to the potential purchaser's advisers
- Your information may be included in the transferred assets

Legal and regulatory bodies

- Courts and tribunals
- Regulatory authorities including as required for reporting obligations
- Law enforcement officers

Other parties

- Third parties you have authorised
- Emergency services when necessary
- Any other parties as required or permitted by law

Overseas disclosure

Storage and access

We store your personal information in Australia. However, your information may be accessed from or transferred to locations outside Australia in these circumstances:

- When our service providers are located overseas
- When we work with overseas business partners
- When using cloud-based services or data storage solutions

Our approach to overseas disclosure

Before disclosing your personal information overseas, we take reasonable steps to ensure that the recipient treats your information in accordance with applicable law by only sending what is necessary, requiring recipients to protect your information through contractual agreements which require the recipient to comply with the privacy standards in applicable law or through other mechanisms that provide comparable safeguards and by monitoring how recipients handle your information.

Your privacy rights and choices

Providing information

You can choose whether to provide personal information to us, however, if you don't provide certain information, we may not be able to provide some services. Let us know if you don't want to provide information and we will let you know when information is required versus optional.

Access to your information

You can request access to the personal information we hold about you and we will respond to your request within a reasonable time. We may charge a reasonable administrative fee for providing access and if we cannot provide access, we will explain why and explore alternative ways to share relevant information.

Correction rights

You can ask us to correct any information that is inaccurate, out of date, incomplete, irrelevant or misleading and we will take reasonable steps to correct your information promptly. If we cannot make the correction, we will explain why and discuss alternatives. You can ask us to add a statement to your information noting your requested correction.

Marketing communications

You can opt-out of receiving marketing communications at any time. Each marketing communication will include an unsubscribe option. You can change your marketing preferences by contacting us. We will process your request as soon as practicable.

How to contact us about your rights or to make a complaint and what happens next

Step 1: Contact our privacy officer

- Email: support@formento.io
- Phone: 0430 556 090
- Post: PO BOX 1836 Hornsby Westfield, NSW 2077

What to include:

Your full name, contact details, clear details about your request or complaint, and any relevant dates or reference numbers.

Step 2: Our response

We will:

- Verify your identity before processing your request
- Investigate thoroughly (for complaints) or process your request (for rights)
- Respond to you in writing within reasonable timeframes and as required by law

- Explain what actions we will take and keep you updated on progress
- Not charge you for making a request (except for reasonable access fees if applicable)
- Help you understand and exercise your rights

Step 3: If you're not satisfied (complaints only)

If you're not satisfied with our response to your complaint, you can:

- Ask for a review by our senior management, or
- Contact external bodies:
 - Australian residents: Office of the Australian Information Commissioner (Phone: 1300 363 992, Website: www.oaic.gov.au)
 - New Zealand residents: Office of the New Zealand Privacy Commissioner
 - UK residents: Information Commissioner's Office (Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, helpline number: 0303 123 1113, website: <https://www.ico.org.uk/make-a-complaint>)

You don't have to contact us first before going to the ICO, but we'd appreciate the opportunity to try to resolve your concerns directly with you.

This is the same process whether you want to access your information, correct mistakes, change marketing preferences, or make a complaint about our privacy practices.

Protecting your information

We use multiple layers of security to protect your information.

Technical safeguards

- Enterprise-grade encryption for data storage and transmission
- Regular security testing and monitoring
- Automated threat detection systems

Operational security

- Staff training on security and privacy
- Strict access controls based on job requirements
- Regular security audits and incident response procedures testing

Physical security

- Secure premises with controlled access
- Secure disposal of physical documents
- Equipment security protocols

Public information

Please note that any information you choose to share publicly on online platforms (such as comments or reviews) can be accessed and used by others. We cannot control or protect information that you make publicly available.

How long we keep your information

We keep your personal information only as long as we need it for the purposes we collected it, or as required by law. When we no longer need it, we securely destroy or de-identify it.

Cookies and Analytics

What We Use

We use cookies, tracking pixels, and similar technologies on our website and in our emails to improve your experience and

our services.

Cookies

- Small text files stored on your device
- Help remember your preferences
- Enable certain website functions
- Make your interactions with our website more efficient

Tracking Pixels

- Tiny, invisible images in web pages and emails
- Help us understand how you interact with our content
- Allow us to measure email engagement
- Enable more relevant content delivery

How we use these technologies

Essential Functions

- Remember your login status
- Maintain your session security
- Store your preferences
- Enable core website features

Analytics and Performance

- Understand how our website is used
- Measure page views and traffic
- Analyse user navigation patterns
- Identify areas for improvement

Personalisation

- Remember your preferences
- Tailor content to your interests
- Improve your browsing experience
- Provide relevant recommendations

Your control

You can manage these technologies by:

- Adjusting your browser settings to block or delete cookies
- Using privacy-focused browser extensions
- Configuring your email client to block images
- Using our cookie preference settings

Note: Blocking all cookies may affect website functionality and your user experience.

Google Analytics

We use Google Analytics to understand how people use our website. This involves cookies that collect information about

your browsing activity. You can opt out of Google's advertising features through your Google account settings, browser add-ons, or your device's privacy settings. Google provides various tools and options to control how your data is used for advertising purposes. You can learn more about how Google uses your data and your available options on Google's privacy pages.

Meta advertising tools

We use Meta's advertising tools (such as Meta Pixel) to understand how our ads perform and to show you more relevant advertisements on Meta platforms like Facebook and Instagram when you visit our website or app. You can manage whether we connect information from our website with your Meta account for advertising purposes by adjusting your settings within your Meta account preferences.

Artificial Intelligence (AI) Technologies

Overview

We use artificial intelligence and machine learning technologies in our business operations and services, including AI tools provided by third parties. We only use these technologies when legally permitted and necessary for our business.

How we use AI

We may use AI technologies to:

- Conduct analysis and data processing
- Generate and modify content and coding
- Improve and optimise our services and operations
- Automate routine tasks and communications
- Personalise your experience with our services
- Support quality assurance processes
- Assist with customer support and queries

Data protection and security

When we work with third-party AI providers, we ensure they handle your personal information in accordance with privacy laws through contractual requirements and appropriate safeguards.

Your rights and our commitments

Any information generated or inferred about you by AI technologies is treated as personal information, and you maintain all the rights outlined in this privacy policy. When using AI with your personal information, we commit to:

Transparency and control

- We'll inform you when AI is used to make decisions that may significantly affect you
- We maintain human oversight and review of significant AI-generated decisions
- Our staff are trained to understand AI limitations and verify outputs before relying on them
- We implement processes to verify the accuracy of AI-generated outputs

Security

- We use appropriate technical and organisational measures to maintain the security and integrity of your personal information
- We regularly test and monitor AI outputs for accuracy and reliability

Risk mitigation

- We regularly assess and document risks associated with using AI to process personal information
- We implement appropriate measures to address these risks

- We continuously monitor AI performance and regularly review their impact

Amendments

We may update this policy at any time by posting the revised version on our website. We recommend that you review our website regularly to stay current with any policy changes.

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APPENDIX 1: ADDITIONAL RIGHTS AND INFORMATION FOR INDIVIDUALS LOCATED IN THE EU OR UK

Under the General Data Protection Regulation (EU) 2016/679 (**GDPR**) and, for UK residents, the UK General Data Protection Regulation (as incorporated into UK law) and the Data Protection Act 2018 (together, the **European Data Protection Laws**), individuals located in the EU and UK have additional rights which apply to their personal information. Personal information under these Data Protection Laws is often referred to as personal data and is defined as information relating to an identified or identifiable natural person. This Appendix 1 sets out the additional rights we give to individuals located in the EU and UK, as well as the lawful basis on how we process the personal information of individuals located in the EU and UK.

Legal bases for processing personal information

European Data Protection Law requires us to have proper legal reasons for using your personal data. We can only use your information when we have one or more of these legal bases.

- **Consent** - You have clearly agreed to us using your personal data for a specific purpose.
- **Performance of a contract** - We need to use your information to fulfil a contract with you, or because you've asked us to do something before entering into a contract.
- **Legal duty** - We must use your information to comply with the law.
- **Vital interests** - We need to use your information to protect someone's life.
- **Public interest** - We need to use your information to perform a task in the public interest or carry out official functions that have a clear legal basis.
- **Legitimate interests** - We have a genuine business reason to use your information, or a third party does, but only if this doesn't unfairly override your rights and interests. Where we rely on legitimate interests as our legal basis, we have conducted balancing tests to ensure our interests do not override your fundamental rights and freedoms. These assessments consider:
 - The nature of our legitimate interest
 - The impact on you
 - Any safeguards we can implement
 - Your reasonable expectations
 - The broader context of our relationship

Note that we may process your personal data for more than one legal basis depending on the specific purpose for which we are using your data. We have listed the reasons we process your data and the legal basis below. Please reach out to us if you need further details about the specific legal basis we are relying on to process your personal data.

The full purposes of processing are set out in the policy above under "Why we collect, hold, use and disclose personal information" and the legal basis for this processing is set out below

Purpose: Business operations

Legal basis for using this information:

- Performance of a Contract
- Legal Duty (for billing and record-keeping requirements)
- Legitimate interests

Types of information we use:

- Identity and contact details
- Service related information
- Digital information

Purpose: Client onboarding and verification

Legal basis for using this information:

- Performance of a Contract
- Legal Duty

- Public Interest
- Legitimate interests

Types of information we use:

- Identity and contact details
- Financial information

Purpose: Communication and support

Legal basis for using this information:

- Legitimate interests

Types of information we use:

- Identity and Contact Data
- Digital Information

Purpose: Service improvement

Legal basis for using this information:

- Legitimate interests

Types of information we use:

- Digital Information

Purpose: Marketing and promotions

Legal basis for using this information:

- Legitimate interests

Types of information we use:

- Identity and Contact Data
- Digital Information

Purpose: Employment purposes

Legal basis for using this information:

- Legitimate interests
- Legal Duty
- Consent
- Performance of a Contract

Types of information we use:

- Identity and Contact Data
- Professional Data

Purpose: Legal and compliance

Legal basis for using this information:

- Legal Duty

Types of information we use:

- All relevant personal information

Overseas transfers

Your information may be transferred to locations outside the EU or United Kingdom in these circumstances:

- When required as part of providing our services

- When our service providers are located overseas
- When we work with overseas business partners
- When using cloud-based services or data storage solutions
- When required by law or legal proceedings

Our approach to overseas transfers

When we transfer your personal data outside the EU or United Kingdom, we ensure it receives appropriate protection by:

- Only transferring your information to countries that European Data Protection Laws recognise as providing adequate protection for personal information,
- Putting in place a contract with the third party that means they must protect personal data to the same standards as the EU or UK, or
- Transferring personal data to organisations that are part of specific agreements on cross-border data transfers with the EU or UK.

Data retention

How long we keep your information

We only keep your personal data for as long as we need it to:

- Provide our services to you
- Meet our legal, tax, accounting or regulatory obligations
- Handle any complaints or legal issues that may arise

We may keep your information for longer periods if:

- You make a complaint that we need to investigate or respond to
- We reasonably believe legal action involving our relationship with you might occur
- The law requires us to keep it for specific timeframes

How we decide retention periods

When determining how long to keep your information, we consider:

- How much information we have and how sensitive it is
- The risk of harm if the information was accessed without permission
- Whether we can achieve our purposes in other ways
- What legal, regulatory, tax or accounting rules require
- The nature of our relationship with you and the services we provide

What happens when we no longer need your information

Once we no longer need your personal data, we will securely delete or destroy it in accordance with our data retention policies and legal requirements.

You can request information about retention periods for your data and ask for early deletion where legally possible.

Rights in relation to personal data

In addition to the rights you have in our policy above, you also have the below rights.

Right to Erasure

You can request deletion of your personal data in certain limited circumstances as set out in European Data Protection Law, such as where the data is no longer necessary or has been unlawfully processed. This right is not absolute and we may be required or entitled to retain your data for legal, regulatory or legitimate business reasons.

Right to Restrict Processing

You can ask us to suspend processing where:

- You contest the accuracy of the data

- Processing is unlawful but you don't want erasure
- We no longer need the data but you need it for legal claims
- You've objected to processing pending verification of our legitimate grounds

Right to Data Portability

Where technically feasible, you can receive your personal data in a structured, commonly used format or have it transmitted to another controller where:

- Processing is based on consent or contract
- Processing is automated

Right to Object

You can object to processing based on legitimate interests or for direct marketing purposes. We will stop processing unless we can demonstrate compelling legitimate grounds.

Right to Withdraw Consent

Where processing is based on consent, you can withdraw it at any time without affecting the lawfulness of prior processing.

Contact details for GDPR matters

For any questions about how we process your personal information under GDPR, please contact us at:

support@formento.io