



PRIVACY POLICY

1 INTRODUCTION

This document sets out the privacy policy of grovia Operations Pty Ltd (ABN [12 651 133 283](#)) trading as “**grovia**” (referred to in this privacy policy as ‘**we**’, ‘**us**’, or ‘**our**’).

We take our privacy obligations seriously and have created this privacy policy to explain how we collect, hold, use, disclose and otherwise process personal information in connection with our website, platform, advisory and consulting services, project delivery activities, report generation, geospatial and environmental analysis, and related artificial intelligence, machine learning, automation and analytics features.

By providing personal information to us, using our website or platform, uploading information to our systems, or otherwise engaging with our services, you consent to our collection, holding, use, disclosure and other processing of personal information in accordance with this privacy policy.

Some features of our services may involve automated processing, machine learning, artificial intelligence tools and model-assisted outputs. This privacy policy explains how personal information may be handled in connection with those features.

We may change this privacy policy from time to time by posting an updated copy on our website and we encourage you to check our website regularly to ensure that you are aware of our most current privacy policy.

2 TYPES OF PERSONAL INFORMATION WE COLLECT

The personal information we collect may include the following:

- (a) name;
- (b) property address and boundaries (geospatial data);
- (c) project-related data (such as land use, vegetation, soil data);
- (d) email address;
- (e) social media information;
- (f) telephone number and other contact details;
- (g) professional or organisational affiliation (if applicable);
- (h) age;
- (i) date of birth;
- (j) credit card or other payment information;
- (k) information about your business or personal circumstances;
- (l) information in connection with client surveys, questionnaires and promotions;
- (m) your device identity and type, I.P. address, geo-location information, page view statistics, advertising data and standard web log information;
- (n) account information (login credentials, usage logs);
- (o) information about third parties;
- (p) any other information provided by you to us via our website or our online presence, or otherwise required by us or provided by you;
- (q) uploaded files, maps, shapefiles, images, coordinates, plans, ecological datasets, survey data and other project materials;
- (r) prompts, instructions, annotations, comments, revisions, feedback and other user interactions relating to reports, modelling, analysis or AI-assisted features;



- (s) outputs, classifications, labels, summaries, recommendations, reports, inferences and other information generated or assisted by our platform, systems or personnel;
- (t) metadata relating to file uploads, downloads, workflow activity, account actions and interactions with our services;
- (u) information relating to your project, landholding, stakeholders, contractors, service providers or professional advisers; and
- (v) any other information reasonably required for us to provide our services, improve our systems or comply with legal and regulatory obligations.

3 HOW WE COLLECT PERSONAL INFORMATION

We may collect personal information either directly from you, or from third parties, including where you:

- (a) contact us through our website;
- (b) submit inputs onto our platform for the purposes of receiving our services;
- (c) upload files and maps;
- (d) receive goods or services from us;
- (e) submit any of our online sign up forms;
- (f) communicate with us via email, telephone, SMS, social applications (such as LinkedIn or Facebook) or otherwise;
- (g) interact with our website, social applications, services, content and advertising;
- (h) invest in our business or enquire as to a potential purchase in our business;
- (i) upload datasets, source materials, project files, maps, imagery or other content to our systems;
- (j) request reports, assessments, recommendations, model outputs or other deliverables from us;
- (k) interact with any AI-assisted, model-assisted, automated or analytics-enabled feature of our platform or services; and
- (l) engage us to provide consulting, advisory, technical, ecological, geospatial, reporting or related professional services.

We may also collect personal information from you when you use or access our website or our social media pages. This may be done through use of web analytics tools, 'cookies' or other similar tracking technologies that allow us to track and analyse your website usage. Cookies are small files that store information on your computer, mobile phone or other device and enable and allow the creator of the cookie to identify when you visit different websites. If you do not wish information to be stored as a cookie, you can disable cookies in your web browser.

We may also collect personal information from your authorised representatives, service providers, counterparties, publicly available sources, data providers, mapping or geospatial tools, contractors and other third parties where reasonably required for us to provide our services.

4 USE OF YOUR PERSONAL INFORMATION

We collect and use personal information for the following purposes:

- (a) to provide goods, services or information to you, including to:
 - (i) conduct environmental feasibility assessments;
 - (ii) generate, review and deliver reports, recommendations and other outputs;
 - (iii) facilitate scenario modelling, project optimisation and project planning;



- (iv) connect users with service providers, contractors, advisers or marketplace participants where applicable;
 - (v) prepare submissions to government bodies on your behalf and with your express consent where required;
 - (vi) perform consulting, advisory, ecological, geospatial, technical, analytical and related professional services;
 - (vii) analyse, classify, extract and interpret information from files, maps, imagery, datasets and other uploaded materials; and
 - (viii) generate draft reports, summaries, recommendations, classifications, predictions and other outputs using human, automated, AI-assisted or model-assisted processes.
- (b) for record keeping, audit, quality assurance and administrative purposes;
 - (c) to provide information about you to our consultants, contractors, employees, professional advisers, insurers, cloud providers, AI and machine learning providers, analytics providers, data processing providers and other third parties for the purpose of providing, supporting, securing or improving our goods or services;
 - (d) to develop, test, train, tune, validate, monitor, improve and optimise our service offering, customer experience, platform, analytics systems, automation tools, artificial intelligence systems and machine learning models;
 - (e) to create internal datasets, testing environments, benchmarks, quality assurance materials and performance review processes, including using uploaded content, prompts, feedback, corrections and outputs generated through our services;
 - (f) to comply with our legal obligations, manage risk, obtain insurance, resolve disputes or enforce our agreements and rights;
 - (g) to send you marketing and promotional messages and other information that may be of interest to you and for the purpose of direct marketing in accordance with applicable law. In this regard, we may use email, SMS, social media or mail to send you direct marketing communications. You can opt out of receiving marketing materials from us by using the opt-out facility provided, such as an unsubscribe link.
 - (h) to process payments;
 - (i) to create and manage user accounts;
 - (j) to send you administrative messages, reminders, notices, updates, security alerts, and other information requested by you; and
 - (k) to consider an application of employment from you.

Without limiting clause 1, we may use personal information and other information you upload or otherwise provide through our website, platform or services to develop, test, train, refine and improve our artificial intelligence, machine learning, analytics and automation tools. This may include using uploaded project files, maps, datasets, prompts, annotations, corrections, feedback and outputs generated through our services.

Where practicable, we may de-identify, aggregate or otherwise minimise personal information used for testing, analytics, model improvement and service development purposes. However, in some cases, personal information may be processed in identifiable form where reasonably necessary for service delivery, model training, debugging, quality assurance, compliance, security or related operational purposes.

We may disclose your personal information to cloud providers, hosting providers, contractors, consultants, insurers, AI and machine learning service providers, analytics providers, payment providers, regulators, government agencies (with user opt-in or where otherwise authorised or required), and other third parties located inside or outside Australia. If we do so, we will take reasonable steps to ensure that any overseas recipient deals with such personal information in a manner consistent with how we deal with it, subject to applicable law.



5 ARTIFICIAL INTELLIGENCE AND AUTOMATED PROCESSING

- (a) We may use artificial intelligence, machine learning, analytics and automated processing tools in connection with our services, including for identifying features in geospatial, environmental or project-related files, generating drafts and reports, classifying data, extracting information, supporting analysis and improving our systems.
- (b) Those tools may be developed by us or provided by third party service providers.
- (c) Outputs generated through AI-assisted or automated processes may contain errors, omissions, inaccuracies or biases and should be reviewed by appropriately qualified personnel before being relied upon.
- (d) Where permitted by law, your use of our services and provision of information to us acknowledges and authorises the handling of personal information described in this privacy policy in connection with those AI-assisted and automated processes.

6 DATA RETENTION

- (a) We retain personal and project-related information for as long as necessary to provide our services, comply with our legal obligations, resolve disputes, and enforce our agreements.
- (b) Given the nature of environmental and carbon offset projects, which may span multiple decades, we may retain relevant user and project data, including property, environmental, and assessment data, for up to 25 years or longer, to support ongoing compliance, auditing, verification, and project performance tracking.
- (c) We retain data according to the following principles:
 - (i) **User account data** (including name, email, and subscription history) is retained while the account is active and for a minimum of 7 years after the account is closed, to comply with regulatory and financial obligations;
 - (ii) **Environmental and property data** linked to specific projects may be retained for up to 25 years to support carbon project audits, government registration requirements, and ecological performance records;
 - (iii) **Payment and billing information** processed via third-party providers (e.g. Stripe) is retained in accordance with those providers' policies and applicable financial recordkeeping laws;
 - (iv) **Backups and system logs** are retained for up to 12 months for operational and security purposes;
 - (v) **AI, analytics and model-improvement records** (including prompts, annotations, corrections, testing data, quality assurance records and related logs) may be retained for as long as reasonably necessary for service delivery, model improvement, compliance, evidentiary, audit, operational and security purposes;
 - (vi) **Generated outputs and deliverables** may be retained for as long as reasonably necessary to provide services, manage disputes, evidence work performed, maintain audit trails and support ongoing projects; and
 - (vii) **Project workflow and activity logs** may be retained for operational, security, audit and compliance purposes.
- (d) Where information is no longer required for the purposes for which it was collected and no legal requirement exists to retain it, we will take reasonable steps to de-identify or securely delete the information.
- (e) If you wish to request deletion or de-identification of your data, you may contact us at contact@grovia.earth. Please note that in some circumstances, we may be required to retain certain data to comply with legal, contractual, or operational obligations.



7 **SECURITY**

We take reasonable steps to ensure your personal information is secure and protected from misuse, interference, loss and unauthorised access, modification or disclosure. Our information technology systems are password protected, and we use a range of administrative, contractual, organisational and technical measures to protect personal information, including where information is processed by our cloud, hosting, analytics, AI, automation and other technology service providers. However, no method of transmission or storage is completely secure and we cannot guarantee the security of your personal information.

8 **LINKS**

Our website may contain links to other websites. Those links are provided for convenience and may not remain current or be maintained. We are not responsible for the privacy practices of those linked websites and we suggest you review the privacy policies of those websites before using them.

9 **REQUESTING ACCESS OR CORRECTING YOUR PERSONAL INFORMATION**

If you wish to request access to the personal information we hold about you, please contact us using the contact details set out below including your name and contact details. We may need to verify your identity before providing you with your personal information. In some cases, we may be unable to provide you with access to all your personal information and where this occurs, we will explain why. We will deal with all requests for access to personal information within a reasonable timeframe.

If you think that any personal information we hold about you is inaccurate, please contact us using the contact details set out below and we will take reasonable steps to ensure that it is corrected.

You may also request further information about the categories of personal information we hold about you, the kinds of uses we generally make of that information, and the kinds of third parties to whom we may disclose that information, subject to applicable law and any lawful grounds for refusal.

10 **COMPLAINTS**

If you wish to complain about how we handle your personal information held by us, including any concerns about our use of automated processing, analytics, machine learning or AI-assisted tools, please contact us using the details set out below including your name and contact details. We will investigate your complaint promptly and respond to you within a reasonable timeframe.

11 **CONTACT US**

For further information about our privacy policy or practices, or to access or correct your personal information, or make a complaint, please contact us using the details set out below:

Name: grovia Operations Pty Ltd (ABN [12 651 133 283](#)) trading as “grovia”

Email: contact@grovia.earth

Our privacy policy was last updated in July 2026.