

CFive Privacy Policy

Version: 1.0

Effective date: 6 May 2026

Created: 6 May 2026

Last updated: 6 May 2026

1. Who we are

CFive Pty Ltd (ABN 21 680 809 385) trades as CFive AI. We provide AI phone receptionist services to automotive dealerships in Australia and New Zealand.

Registered address: Suite 170, Waterman, Tenancy 111, Camberwell Place, 793 Burke Road, Camberwell VIC 3124, Australia.

Privacy queries: privacy@cfive.com.au Privacy Officer: Nick Foord (nick.foord@cfive.com.au)

This policy is published at cfive.ai/legal/privacy.

2. How to read this policy

CFive handles Personal Information from three distinct groups of people, in very different ways. This policy is structured accordingly.

Part A covers Dealership Staff. These are the employees and contractors of the dealerships that use our Service. Their data flows through our platform and CRM.

Part B covers Website Visitors. These are people who browse cfive.ai, submit a contact form, or interact with our website.

Part C covers Callers. These are members of the public who ring a dealership and reach our AI phone receptionist. They never signed a contract with CFive, which raises different privacy considerations from the other two groups.

Read the part that applies to you. If you are a dealership employee asking about a caller's data, read Part C.

In this policy, capitalised terms have the same meanings as in our Master Services Agreement (MSA), published at cfive.ai/legal/msa. Key terms: Authorised User, Caller, Customer, DMS, Order Form, Personal Information, Service, Service Usage Data, Sub-processor, Voice Content. 'Voice Content' refers to audio recordings and transcripts of calls handled by the Service.

Where practicable, you may interact with CFive anonymously or using a pseudonym, for example when browsing cfive.ai without submitting a form. Callers can withhold their caller ID at the network level (for example by dialling a calling-line-identification block prefix or using a privacy setting on their phone). In that case, the call is still answered, recorded, and transcribed, and any details the caller chooses to give during the call are still captured. What we will not have is a phone number tied to the call, which means we may not be able to retrieve the caller's vehicle history, follow up afterwards, or honour a later deletion request based on phone number alone.

Part A. Dealership staff and Authorised Users

A.1 Who this part applies to

This part applies to employees, contractors, and agents of a dealership Customer who access our Service, including the dashboard at app.cfive.ai, DMS integration features, and call reporting tools.

A.2 What we collect

We collect the following categories of Personal Information about Authorised Users:

- Name, business email address, phone number, and role title
- Login credentials (username and hashed password)
- Profile picture (if uploaded)
- Dealership configuration data you provide or approve, including business hours, pricing, and service codes
- Usage data: pages visited on app.cfive.ai, features accessed, integration activity, and login times. The dashboard at app.cfive.ai is served via GoHighLevel (LeadConnector), which sets cookies and tracks usage within the platform.

We also process dealership vehicle and customer information that passes through the Service via DMS integrations. That information belongs to the Customer under MSA section 7.1. We process it to operate the Service on the Customer's behalf; we do not use it for our own purposes beyond what is described in this policy.

A.3 Why we collect it

We use Authorised User data for the following purposes:

- Delivering and supporting the Service, including account management, troubleshooting, and configuration
- Product improvement, using aggregated usage patterns rather than individual behavioural profiles
- Security monitoring, access control, and audit trails
- Legal compliance, including where a breach investigation or regulatory enquiry requires us to review access logs

The legal basis for most of this processing is contractual necessity: the Customer has agreed to our MSA, and providing the Service requires us to hold and use Authorised User data. Product improvement and security monitoring are carried out on the basis of our legitimate interests in running a reliable, secure service.

A.4 Who we share it with

We share Authorised User data with the following categories of Sub-processors to deliver the Service:

- CRM and dashboard providers (United States)
- Cloud database providers (Australia)
- Application hosting providers (United States)
- Support and monitoring tools (United States)
- Customer support and ticketing platform (United States), used to handle support requests from dealership staff
- Internal communication tools (United States / Australia)

The named Sub-processors, their locations, and their roles are listed at trust.cfive.ai/sub-processors, updated at least every 30 days.

We do not sell Authorised User data. We do not share it with third parties for their own marketing purposes.

A.5 How long we keep it

We keep Authorised User data for the duration of the MSA Term for the relevant Customer, plus a 7-day backup retention window, plus any period required by law. On termination, we delete or de-identify Authorised User data within 30 days, as set out in MSA section 10.5. We may retain data longer if a legal hold is in place, for example during an active dispute or legal claim.

A.6 Your rights

We take reasonable steps to keep personal information accurate, up to date, and complete. If you believe information we hold about you is inaccurate, you can request a correction as described below.

You have the right to:

- Request access to the Personal Information we hold about you (APP 12)
- Request correction of inaccurate information (APP 13)
- Request deletion of your Personal Information, subject to legal hold and backup windows

To make a request, contact privacy@cfive.com.au. We will acknowledge within 5 business days and respond within 30 calendar days. If we cannot fulfil your request, we will explain why.

If you are not satisfied with our response, you can escalate to the OAIC (Australia) or the Privacy Commissioner (New Zealand).

Part B. Website visitors

B.1 Who this part applies to

This part applies to anyone who visits cfive.ai, submits a contact or demo request form, or interacts with tracking tools active on the site.

B.2 What we collect

We collect the following categories of Personal Information from website visitors:

From contact and demo request forms: - Name, email address, phone number, company name, role, and the content of your message

From cookies and tracking technologies: - IP address, device type, browser, pages visited, time on site, referral source, and click behaviour

The specific tracking tools active on cfive.ai are described in section B.4.

Contact form submissions are routed directly into GoHighLevel (LeadConnector), our CRM platform. That data is used for sales follow-up and demo scheduling.

B.3 Why we collect it

We use website visitor data for the following purposes:

- Responding to contact and demo requests
- Sales follow-up and scheduling commercial discussions
- Website analytics, including understanding traffic sources, user journeys, and conversion performance
- Marketing optimisation, including ad retargeting where you have consented

The legal basis for processing contact form submissions is a combination of contractual necessity (we need to respond to your request) and legitimate interests (following up on commercial enquiries). Analytics and marketing tracking are carried out on the basis of our legitimate interests in measuring how cfive.ai performs

as a marketing channel and in promoting our services to a relevant audience of automotive dealership decision-makers. The specific tools we use, the data they process, and how to opt out are set out in section B.4 below.

We send marketing communications only with your prior consent, in compliance with the Spam Act 2003 (Cth). You can unsubscribe from email communications using the unsubscribe link in any email we send. You can opt out of SMS messages by replying STOP.

B.4 Cookies and tracking technologies

The following tools are active on cfive.ai as of the date of this policy:

- Google Analytics 4 (ID: G-4BVGR8NHFM). Measures traffic volumes, user behaviour, and conversion events. Sets cookies including `_ga` and `_gid`. Data processed in the United States. Retention: 24 months. You can opt out via the Google Analytics opt-out browser extension.
- Meta Pixel (ID: 1786938898399170). Served via `back.cfive.ai` (a self-hosted proxy). Tracks site visits and form interactions for ad retargeting on Meta platforms. Sets the `_fbp` cookie. Retention: 90 days. You can manage Meta ad preferences and opt out of personalised advertising at facebook.com/settings?tab=ads.
- GoHighLevel / LeadConnector (served via `back.cfive.ai/js/external-tracking.js`). Sets identifiers used for lead attribution, contact form processing, and pipeline tracking. Retention is determined by GoHighLevel's own retention settings; CFive does not configure a custom retention period for these identifiers. Data processed in the United States.
- Trustmary (ID: dR7va7qq0). Social proof widget loaded from `widget.trustmary.com`. Sets session cookies. Data processed subject to Trustmary's own privacy policy.
- Google reCAPTCHA. Active on the contact form for fraud prevention. Processes device and interaction signals. Data processed in the United States.
- YouTube embeds. Two video embeds are present on the homepage. YouTube may set cookies when you interact with a video. Data processed in the United States subject to Google's privacy policy.
- Google Fonts. Loaded via `fonts.googleapis.com`. Your IP address is sent to Google as part of the font request. Data processed in the United States.

No LinkedIn Insight Tag or Hotjar is active on this site.

You can manage cookie preferences through your browser settings at any time. Disabling analytics and marketing cookies will not affect your ability to use the site.

B.5 How long we keep it

Contact form and demo request data is kept for up to two years for sales follow-up, consistent with the Spam Act 2003 (Cth). Analytics and tracking data is retained according to the default retention settings of the relevant third-party tool (typically 24 months for GA4 and 90 days for Meta Pixel).

If you unsubscribe or request deletion, we will remove your details from our CRM promptly.

B.6 Your rights

You have the right to access, correct, or request deletion of Personal Information we hold about you as a website visitor. Contact privacy@cfive.com.au. We will respond within 30 calendar days.

You can also manage cookie preferences directly through your browser or through Meta's and Google's own preference centres.

Part C. Callers

C.1 Who this part applies to

This part applies to anyone who rings a dealership that uses our Service and is connected to our AI phone receptionist. You may not have known, before the call, that the dealership uses CFive. This section explains what we collect, why, and what rights you have.

C.2 What we collect

When you call a dealership that uses our Service, we collect:

- Your name, as provided during the call
- Your phone number, from caller ID and any digits you enter
- Vehicle information, including make, model, year, registration, and VIN if you provide them
- Details you describe during the call, including the reason for your call, the department you want to reach (service, sales, parts, finance, accounts, or other), preferred dates and times for any appointment, and any issues you describe with your vehicle
- Call audio: a full recording of the call from start to finish
- Call transcript: a text version of the call produced by our speech-to-text system. Transcription errors may occur
- Call metadata: call start time, duration, outcome (for example, appointment booked, transferred to staff, or call ended without outcome), AI confidence scores, and intent classification

Sensitive information

Callers may volunteer sensitive personal information during a call, such as payment card details, health information, or government identifiers. The Service does not solicit this information and is not designed to receive it. CFive recommends that callers do not provide payment details over the phone, even if asked. Where sensitive information is captured in a transcript, callers can request its deletion at privacy@cfive.com.au by providing the phone number used to make the call. CFive is working on automated redaction of sensitive information from transcripts as part of ongoing service improvements.

C.3 Why we collect it

We process caller data for the following purposes:

- Handling your call and, where you request it, booking appointments, taking enquiries, transferring calls, or providing information across the dealership's departments
- Passing your details and call summary to dealership staff so they can follow up if needed
- Quality assurance: we review samples of calls to check that our AI is performing accurately and handling calls appropriately
- Product improvement: we analyse aggregated call patterns, transcription accuracy, and intent detection to improve the Service. We do not build individual profiles of callers for this purpose
- Legal compliance: state-based Surveillance Devices Acts in Australia require notification of call recording. Call recordings also serve as the contemporaneous record of what was said, which is relevant if a booking detail is disputed

The primary legal basis for processing caller data is legitimate interests. The dealership has a legitimate interest in handling customer calls. You, as the caller, have a legitimate interest in achieving the purpose of your call, whether that is booking an appointment, making an enquiry, being transferred to a department, or getting information from the dealership. Processing your data is necessary to deliver that service.

Continuing the call also establishes the contractual relationship with the dealership for that service transaction, which provides an additional legal basis for the core processing.

C.4 How you are notified before we collect your data

We are required under APP 5 and applicable state surveillance device laws to notify you that a call is being recorded before the recording starts.

At the start of every call, our virtual assistant identifies itself as an automated or AI assistant. The exact phrasing varies (for example, “Hi, I’m [name], the AI receptionist for [Dealer]” or “I’m your virtual assistant from [Dealer]”) and we adjust it over time as we optimise the experience. The substance of the disclosure, that you are speaking with an AI rather than a human, is consistent across all CFive-handled calls.

The dealership’s IVR system also plays a notification before the call reaches our virtual assistant. CFive recommends the following IVR script: “This call may be recorded for quality and training purposes.” CFive requires each Customer to maintain this IVR notification under MSA section 10.2.

The Customer is responsible for the continued operation of the IVR notification. Where the Customer removes or modifies the notification without CFive’s knowledge, that is a breach of the Customer’s obligations under the MSA. CFive takes reasonable steps to verify the IVR notification is in place at onboarding and at renewal, but does not monitor the dealership’s phone system in real time.

C.5 Who your data belongs to and who has access to it

The dealership is the entity responsible for caller Personal Information under the Privacy Act 1988 (Cth) and equivalent New Zealand legislation. CFive processes caller data on the dealership’s behalf, under MSA section 10.2.

All call content, transcripts, and metadata are made available to the dealership through the dashboard at app.cfive.ai. The dealership’s staff use this information to manage bookings and enquiries across departments, follow up with customers, and review AI performance.

CFive also processes caller data through the following categories of Sub-processors:

- Voice AI providers (United States): process call audio and generate transcripts during the call
- Telephony providers (global with Australian point of presence): route the call and provide calling metadata
- Cloud database providers (Australia, Sydney): store call metadata and booking details
- Application hosting providers (United States): run our processing infrastructure

Named Sub-processors and their locations are listed at trust.cfive.ai/sub-processors.

C.6 Model training

We do not use Voice Content to develop, train, or fine-tune AI models unless: (a) the dealership has given prior written consent for the use of its calls for that purpose, and (b) any prior written consent required under CFive’s upstream integration agreement with the relevant DMS provider has been obtained.

As of the date of this policy, calls processed through certain DMS integrations are excluded from any model training pipeline pending the required DMS provider consents. If you have questions about whether a specific call was used for model training, contact privacy@cfive.com.au.

C.7 How long we keep caller data

Default retention for call audio, transcripts, caller contact data, and metadata is 30 days from the date of the call. Dealerships may configure longer or shorter retention periods through their service agreement with CFive.

Where a legal hold applies, for example if a booking is disputed or a legal claim is made, we may retain relevant call records beyond the standard retention period.

If you provide your phone number when making a deletion request, we can identify and delete your call records. Where a phone number matches more than one call record, we will identify all matching records and confirm with you before deleting. See section 6 for how to make a request.

C.8 If you have questions about your call data

Because the dealership is the entity responsible for caller Personal Information, your first point of contact for access, correction, or deletion requests is the dealership itself.

You can also contact CFive directly at privacy@cfive.com.au. If you provide your phone number, we can identify your call records and respond to your request within 30 calendar days.

3. Overseas disclosure

We process Personal Information in multiple countries. The primary locations are:

- Australia: call metadata and configuration data are stored in Sydney via our database provider.
- United States: voice AI processing, telephony routing, CRM and dashboard hosting, analytics, and ad retargeting all involve US-based providers.

Call audio and transcripts may transit through US-based infrastructure during processing.

CFive takes reasonable steps to require all overseas Sub-processors to handle Personal Information in a way consistent with the Australian Privacy Principles and, for New Zealand customers and callers, the New Zealand Information Privacy Principles. These steps include contractual safeguards covering confidentiality, security, breach notification, and restrictions on use. See MSA section 10.3 for the full description.

By using our Service or submitting a contact or demo request form, you acknowledge that your Personal Information may be processed in these countries as described in this policy.

The full Sub-processor list, including locations, is at trust.cf5e.ai/sub-processors.

Where an overseas Sub-processor fails to meet these privacy standards, CFive remains responsible to the Customer for that failure under MSA section 9.4.

4. Data security

We apply technical and organisational measures appropriate to the risks of processing the Personal Information we hold. These include encryption at rest (AES-256), encryption in transit (TLS 1.2 or higher), multi-factor authentication for staff access, access controls limiting data access to those who need it, activity logging and anomaly monitoring, and regular vulnerability testing.

Our security documentation is at trust.cf5e.ai. Our first external penetration test is scheduled for May 2026, conducted by Silverse via our compliance partner Ciphrix.

CFive imposes equivalent security obligations on all Sub-processors under MSA section 9.4.

No security measure is perfect. If we become aware of a breach affecting your Personal Information, we will notify you as described in section 8.

5. Data retention

Data category	Default retention	Deletion or control mechanism
Dealership staff account data	Duration of MSA Term	30 days after termination or on written request
Call audio and transcripts	30 days from date of call (configurable per dealership)	On written request from the caller, on termination of the dealership's MSA (subject to upstream DMS deletion windows), or earlier where required by an upstream DMS integration agreement
Caller contact data (name, phone, vehicle, booking details)	30 days from date of call (configurable per dealership)	Same as above
Call metadata	30 days from date of call (configurable per dealership)	Same as above
Website contact form data	2 years	On unsubscribe or written request
Analytics and tracking data	24 months (GA4 default), 90 days (Meta Pixel default)	Managed via third-party platform settings; opt out via browser or platform

All retention is subject to legal holds as described in MSA section 10.5. DMS-sourced data must be deleted within 30 days of termination of the relevant upstream DMS integration, consistent with CFive's obligations to its DMS providers under MSA section 7.6.

6. Your rights

Under the Australian Privacy Act 1988 (Cth), you have the right to:

- Request access to the Personal Information we hold about you (APP 12)
- Request correction of Personal Information that is inaccurate, out of date, incomplete, or misleading (APP 13)
- Request deletion of your Personal Information in appropriate circumstances

To make a request, contact privacy@cfive.com.au. Include your name and, for caller requests, your phone number so we can identify your records. We will acknowledge your request within 5 business days and respond within 30 calendar days.

We may decline a request where the law requires or permits us to, for example where a legal hold applies or where responding would unreasonably affect the privacy of another person. If we decline, we will explain why.

If you are not satisfied with our response, you can complain to the Office of the Australian Information Commissioner (OAIC) at oaic.gov.au/privacy/privacy-complaints or by calling 1300 363 992. New Zealand residents can complain to the Privacy Commissioner at privacy.org.nz or by calling 0800 803 909.

For caller access requests: because the dealership is the entity responsible for caller Personal Information, you may find it faster to contact the dealership directly. CFive will also respond to requests made directly to us.

7. New Zealand data subjects

For individuals in New Zealand, the Privacy Act 2020 (NZ) applies in addition to the Australian Privacy Act 1988 (Cth).

CFive appoints a Privacy Officer for New Zealand purposes. Contact: Nick Foord, nick.foord@cfive.com.au.

Your rights under the New Zealand Privacy Act 2020 include the right to request access to and correction of your Personal Information, and the right to request deletion where applicable. To exercise these rights, contact nick.foord@cfive.com.au.

Cross-border transfers of New Zealand residents' data are subject to the New Zealand Information Privacy Principles. CFive requires overseas Sub-processors to maintain equivalent privacy protections through contractual data processing agreements. A copy of CFive's transfer documentation is available on request.

For New Zealand dealership customers, CFive obtains explicit consent from the Customer before using call data for product improvement purposes. New Zealand customers may withdraw this consent at any time by contacting privacy@cfive.com.au.

If you have a complaint that CFive has not resolved to your satisfaction, you can contact the Privacy Commissioner at privacy.org.nz or 0800 803 909.

8. Data breach notification

If CFive becomes aware of a Security Incident affecting Personal Information, we will notify the affected dealership Customer within 72 hours of becoming aware, as required by MSA section 17.1. Our notification will describe the nature of the incident, the categories of data affected, the steps we are taking to contain it, and a contact for further information.

Where a security incident amounts to an Eligible Data Breach under the Privacy Act 1988 (Cth), CFive will assess the incident, and where notification is required by the Notifiable Data Breaches scheme, notify the OAIC and affected individuals (or their dealership where direct contact details are not held) as soon as practicable in accordance with the scheme.

For New Zealand data subjects, CFive will notify the New Zealand Privacy Commissioner within 72 hours of becoming aware of a qualifying breach involving New Zealand data subjects. Notification to affected individuals may flow through the dealership where CFive does not hold direct contact details beyond the caller's phone number.

9. Children's data

Our Service is not directed at individuals under the age of 16. We do not knowingly collect Personal Information from children under 16. If we become aware that a child under 16 has provided us with Personal Information, we will delete it within 30 days.

If you are a parent or guardian and believe your child has provided Personal Information to CFive, contact privacy@cfive.com.au.

10. Unsolicited personal information

If we receive Personal Information we did not actively collect, for example, if someone includes a third party's details in a contact form, we will assess whether the information is relevant to our purposes. If it is not, we will delete it promptly.

11. Government identifiers

We do not collect government identifiers, such as tax file numbers, driver's licence numbers, or Medicare numbers, unless required to do so by law, for example for identity verification in a legal dispute.

12. Changes to this policy

We may update this policy from time to time. Material changes will be notified to dealership Customers by email at least 30 days before taking effect. The current version of this policy is always at cfive.ai/legal/privacy.

Non-material changes, such as correcting a typo or updating a sub-processor location, take effect on the date posted.

13. Contact us

For all privacy queries: privacy@cfive.com.au

CFive Pty Ltd Suite 170, Waterman, Tenancy 111, Camberwell Place 793 Burke Road, Camberwell VIC 3124
Australia

We will respond to privacy requests within 30 calendar days.