

NULLIFY – PRIVACY POLICY

Nullify Holdings Pty Ltd (ABN 18 664 463 950) (**we, us or our**), understands that protecting your personal information is important. This Privacy Policy sets out our commitment to protecting the privacy of personal information provided to us, or otherwise collected by us when providing our platform *Nullify* to you, or when otherwise interacting with you (including via our website) (**Services**).

The information we collect

Personal information: is information or an opinion, whether true or not and whether recorded in a material form or not, about an individual who is identified or reasonably identifiable. The types of personal information we may collect about you include:

- **Identity Data** including first name and last name.
- **Contact Data** including email address.
- **Technical and Usage Data** including internet protocol (IP) address, your login data, your browser session, device and network information, statistics on page views and sessions, information about your access and use of our website, including through the use of Internet cookies, your communications with our website, the type of browser you are using, the type of operating system you are using and the domain name of your Internet service provider.
- **Profile Data** including your username and password for Nullify, support requests you have made, and your interests and preferences.

How we collect personal information

We collect personal information in a variety of ways, including:

- **Directly:** We collect personal information which you directly provide to us, including when you register for Nullify, through the 'contact us' form on our website or when you request our assistance via email.
- **Indirectly:** We may collect personal information which you indirectly provide to us while interacting with us, such as when you use our website, in emails, and in your online enquiries.
- **From third parties:** We collect personal information from third parties, such as details of your use of our website from our analytics and cookie providers. See the "Cookies" section below for more detail on the use of cookies.
- **From publicly available sources:** We collect personal data from publicly available resources such as professional networking sites such as LinkedIn.

Why we collect, hold, use and disclose personal information

We have set out below, in a table format, a description of the purposes for which we plan to collect, hold, use and disclose your personal information.

Purpose of use / disclosure	Type of Personal Information
To enable you to access and use Nullify, including to provide you with a login.	<ul style="list-style-type: none">• Identity Data• Contact Data
To contact and communicate with you about our Services including in response to any support requests you lodge with us or other enquiries you make with us.	<ul style="list-style-type: none">• Identity Data• Contact Data• Profile Data
To contact and communicate with you about any enquiries you make with us via our website.	<ul style="list-style-type: none">• Identity Data• Contact Data
For internal record keeping and administrative purposes.	<ul style="list-style-type: none">• Identity Data• Contact Data
For analytics on our website and business development, including to operate and improve our Services.	<ul style="list-style-type: none">• Profile Data• Technical and Usage Data
To comply with our legal obligations or if otherwise required or authorized by law.	<ul style="list-style-type: none">• Any relevant Personal Information

Our disclosures of personal information to third parties

We may disclose personal information to:

- our employees, contractors and/or related entities;
- IT service providers, data storage, web-hosting and server providers such as AWS;
- professional advisors, bankers, auditors, our insurers and insurance brokers;
- our existing or potential agents or business partners;
- anyone to whom our business or assets (or any part of them) are, or may (in good faith) be, transferred;
- courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services we have provided to you;
- courts, tribunals, regulatory authorities and law enforcement officers, as required or authorised by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights;
- any other third parties as required or permitted by law, such as where we receive a subpoena.

Overseas disclosure

We are based in Australia, however some of our third-party service providers are located outside of Australia, including in the United States and other countries. As a result, your personal information may be transferred to, stored, or processed in countries outside of Australia and the European Economic Area (EEA).

For users in the European Economic Area (EEA), United Kingdom, and Switzerland:

When we transfer your personal data outside of the EEA, UK, or Switzerland, we ensure that appropriate safeguards are in place to protect your data, including:

- **Standard Contractual Clauses (SCCs):** We use the European Commission's Standard Contractual Clauses for transfers to third-party service providers in countries without an adequacy decision.
- **Adequacy Decisions:** Where applicable, we transfer data to countries that the European Commission has determined provide an adequate level of data protection.
- **Additional Safeguards:** Where required, we implement supplementary measures to ensure the effectiveness of these transfer mechanisms.

You have the right to request a copy of the safeguards we use for international transfers by contacting us using the details below.

For Australian users:

We will only disclose your personal information overseas in accordance with the Australian Privacy Principles.

For United States users:

We comply with applicable U.S. state privacy laws regarding the transfer and protection of your personal information. Where required, we ensure appropriate contractual protections are in place with our service providers.

Your rights and controlling your personal information

- **Your choice:** Please read this Privacy Policy carefully. If you provide personal information to us, you understand we will collect, hold, use and disclose your personal information in accordance with this Privacy Policy. You do not have to provide personal information to us, however, if you do not, it may affect our ability to provide our Services to you and your use of our Services.
- **Information from third parties:** If we receive personal information about you from a third party, we will protect it as set out in this Privacy Policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.
- **Anonymity:** Where practicable we will give you the option of not identifying yourself or using a pseudonym in your dealings with us.
- **Restrict and unsubscribe:** To object to processing for direct marketing/unsubscribe from our email database or opt-out of communications, please contact us using the details below or opt-out using the opt-out facilities provided in the communication.
- **Access:** You may request access to the personal information that we hold about you. An administrative fee may be payable for the provision of such information. Please note, in some situations, we may be legally permitted to withhold access to your personal information. If we cannot provide access to your information, we will advise you as soon as reasonably possible and provide you with the reasons for our refusal and any mechanism available to complain about the refusal. If we can provide access to your information in another form that still meets your needs,

then we will take reasonable steps to give you such access.

- **Correction:** If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us using the details below. We will take reasonable steps to promptly correct any information found to be inaccurate, out of date, incomplete, irrelevant or misleading. Please note, in some situations, we may be legally permitted to not correct your personal information. If we cannot correct your information, we will advise you as soon as reasonably possible and provide you with the reasons for our refusal and any mechanism available to complain about the refusal.

We do not sell personal information. We do not share personal information for cross-context behavioral advertising purposes.

To exercise any of your rights, please contact us using the details below. We may need to verify your identity before processing your request.

Complaints: If you wish to make a complaint, please contact us using the details below and provide us with full details of the complaint. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take in response to your complaint. If you are not satisfied with our response, you also have the right to contact:

- **Australia:** Office of the Australian Information Commissioner
- **EEA/UK:** Your local data protection authority
- **California:** California Attorney General

Additional rights for EEA, UK, and Swiss residents

If you are located in the EEA, UK, or Switzerland, you have additional rights under applicable data protection laws, including:

- **Right to erasure:** You may request that we delete your personal data in certain circumstances.
- **Right to restriction:** You may request that we restrict the processing of your personal data in certain circumstances.
- **Right to data portability:** You may request a copy of your personal data in a structured, commonly used, and machine-readable format.
- **Right to object:** You may object to our processing of your personal data in certain circumstances.
- **Right to withdraw consent:** Where we rely on your consent to process your personal data, you may withdraw your consent at any time.
- **Right to lodge a complaint:** You have the right to lodge a complaint with a supervisory authority in your country of residence.

Additional rights for United States residents

If you are a resident of California, Virginia, Colorado, Connecticut, Utah, or other U.S. states with comprehensive privacy laws, you may have additional rights regarding your personal information:

California residents (CCPA/CPRA):

- **Right to Know:** You have the right to request information about the categories and specific pieces of personal information we have collected about you, as well as the categories of sources, purposes for collection, and categories of third parties with whom we share your information.
- **Right to Delete:** You have the right to request that we delete your personal information, subject to certain exceptions.
- **Right to Correct:** You have the right to request that we correct inaccurate personal information.
- **Right to Opt-Out of Sale/Sharing:** We do not sell your personal information or share it for cross-context behavioral advertising.
- **Right to Non-Discrimination:** We will not discriminate against you for exercising any of your privacy rights.

Virginia, Colorado, Connecticut, and Utah residents:

- **Right to Access:** You have the right to confirm whether we are processing your personal data and to access such data.
- **Right to Delete:** You have the right to request deletion of your personal data.
- **Right to Correct:** You have the right to correct inaccuracies in your personal data.
- **Right to Data Portability:** You have the right to obtain a copy of your personal data in a portable format.
- **Right to Opt-Out:** You have the right to opt out of targeted advertising, sale of personal data, and profiling in furtherance of decisions that produce legal or similarly significant effects. We do not engage in these activities.

Categories of Personal Information Collected (for U.S. disclosures):

In the preceding 12 months, we have collected the following categories of personal information:

- Identifiers (name, email address, IP address, account name)
- Internet or network activity information (browsing history on our website, interactions with our Services)

Storage and security

We are committed to ensuring that the personal information we collect is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures, to safeguard and secure personal information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

While we are committed to security, we cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk.

Cookies

We may use cookies on our website from time to time. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally identifiable information. However, they do recognise you when you return to our online website. If and when you choose to provide our online website with personal information, this information may be linked to the data stored in the cookie.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

Links to other websites

Our website may contain links to other party's websites. We do not have any control over those websites and we are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Privacy Policy.

Amendments

We may, at any time and at our discretion, vary this Privacy Policy by publishing the amended Privacy Policy on our website. We recommend you check our website regularly to ensure you are aware of our current Privacy Policy.

For any questions or notices, please contact us at:

Evalify Pty Ltd (ABN 32 664 474 980)

Email: support@nullify.ai

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