

PRIVACY POLICY

Theorem Consulting Pty Ltd (**Company**) may collect certain information through user interactions with our website: www.theoremconsulting.com.au (**Website**). This document (**Privacy Policy**) outlines our policies and procedures regarding the collection, use, and handling of information that identifies individual users or that could be used to contact or locate those individuals (**Personally Identifiable Information or PII**).

CONFIDENTIAL

1. Overview

1.1 This Privacy Policy applies solely to Theorem Consulting. It does not apply to any third-party sites or services associated with Theorem Consulting or linked to our Website.

1.2 Client data stored by Theorem Consulting is not covered by this Privacy Policy.

2. PII we may collect

2.1 We may be provided with the following Personally Identifiable Information by our clients:

2.1.1 Names, email addresses, telephone numbers, addresses

2.1.2 Deal enquiry details

3. Our use of PII

3.1 Theorem Consulting will not use, sell or otherwise disclose client data.

3.2 We may use PII to contact individuals regarding our products and services or communicate with them about products and services. We may also use that information to the extent necessary to enforce our Website terms of service and to prevent imminent harm to persons or property.

3.3 We may from time to time use cookies on our website. Cookies are very small files which a website uses to identify you when you come back to the site and to store details about your use of the site. Cookies are not malicious programs that access or damage your computer. Most web browsers automatically accept cookies but you can choose to reject cookies by changing your browser settings. However, this may prevent you from taking full advantage of our website. Our website may from time to time use cookies to analyse website traffic and help us provide a better website visitor experience. In addition, cookies may be used to serve relevant ads to website visitors through third party services such as Google Adwords. These ads may appear on this website or other websites you visit.

3.4 We may also use information gathered through cookies to compile statistical data about use of our Website, such as the time users spend at the site and the pages they visit most often. These statistics do not include PII.

4. Protection of PII

4.1 We implement the following data security measures to protect Personally Identifiable Information:

- 4.1.1 We use regular Malware Scanning to identify vulnerabilities and threats on our Website to ensure your visit is as safe as possible.
- 4.1.2 Your personal information is stored behind secured networks and is only accessible by a limited number of Theorem Consulting employees who have special access rights to such systems and are required to maintain confidentiality.
- 4.1.3 All sensitive information you submit is encrypted using Secure Socket Layer (SSL) technology.

4.2 While we take extensive measures to protect your PII, we cannot guarantee its absolute security. By using our Website, you acknowledge and agree that we make no such guarantee and that you use our Website at your own risk.

5. Third party access to PII

- 5.1 We do not sell, trade, or otherwise transfer Personally Identifiable Information to external parties. However, we may disclose PII to attorneys, collection agencies, law enforcement authorities or other parties when required to address potential violations of our Acceptable Use Policy (AUP), other contractual obligations or illegal behaviour.
- 5.2 We may also disclose PII in response to a court order or legal obligations or to prevent imminent harm to persons or property. As mentioned above, we may compile Website usage statistics from data collected through cookies and share those statistics with third parties. These statistics do not include PII.

6. GDPR and data subject rights

- 6.1 In accordance with the General Data Protection Regulation (**GDPR**), individuals located in the European Union (**EU**) and European Economic Area (**EEA**) have specific rights concerning their Personal Data. If you are in these regions, you have the following rights:
 - 6.1.1 Right to Access: You have the right to request a copy of your PII stored by Theorem Consulting.
 - 6.1.2 Right to Rectification: You may request the correction of inaccurate or incomplete PII.
 - 6.1.3 Right to Erasure (“Right to be Forgotten”): You have the right to request the deletion of your PII, subject to certain exceptions.
 - 6.1.4 Right to Restriction of Processing: You can request that we restrict the processing of your PII under certain circumstances.

- 6.1.5 Right to Data Portability: You may request a copy of your PII in a structured, commonly used, and machine-readable format.
- 6.1.6 Right to Object: You may object to the processing of your PII for marketing purposes, or where processing is based on legitimate interests.
- 6.1.7 Right to Withdraw Consent: If the processing of your PII is based on consent, you can withdraw that consent at any time.

6.2 To exercise any of these rights, please contact us via the contact details on our Website.

7. SOC Compliance

7.1 Theorem Consulting complies with the System and Organization Controls (SOC) framework. Our security practices are regularly audited to ensure that we meet the stringent requirements for data protection, confidentiality, and availability.

7.2 Theorem Consulting's SOC compliance certifications are available upon request and provide independent verification of our commitment to safeguarding data.

8. Complaints about privacy

8.1 If you have any complaints about our privacy practices, please feel free to send in details of your complaints to Suit 405/ 165-167 Phillip Street Sydney NSW 2000. We take complaints very seriously and will respond shortly after receiving written notice of your complaint.

9. Accessing and correcting your PII

9.1 You can access, correct, or update any Personally Identifiable Information we store by emailing us at intel@theoremconsulting.com.au.

10. Lawful bases

10.1 The legal basis for processing and storing PII are:

- 10.1.1 consent via website form submission;
- 10.1.2 legitimate interests in running an advisory business, screening enquiries and transaction execution;
- 10.1.3 legal obligations under Anti-Money Laundering and Counter-terrorism Financing (AML/CTF), taxation and court orders; and
- 10.1.4 contractual necessity including engagement letters, NDAs.

11. Exclusions

11.1 PII stored by the Company is not covered by this privacy policy and may include:

11.1.1 non-public financials, transaction documents, confidential information shared pre-NDA, third party reports (commercial strategy, accounting, legal); and

11.1.2 such data is used to ensure the best possible client service, shared only with authorised personnel and protected with utmost care to industry standards.

12. Data retention

12.1 We retain information for the following time periods:

12.1.1 website enquiries: 12-24 months

12.1.2 job applications: 6 months

12.1.3 client onboarding: 7 years

12.1.4 transaction documentation: 7 years, or the statutory period

12.1.5 analytics data: 12-24 months

13. Amendment of this Privacy Policy

13.1 We may modify this Privacy Policy at any time by posting a new version on this page or a successor page. The new version will become effective on the date it is posted, which will be indicated at the top of the page as the new Effective Date.