

## Oktopi Privacy Policy

24<sup>th</sup> April 2026

This Privacy Policy was last reviewed and updated on 24<sup>th</sup> April, 2026

### Privacy Policy

Oktopi Pty Ltd (**Oktopi, we, us**) values and respects the privacy of individuals. We are committed to protecting your privacy and complying with the *Privacy Act 1988* (Cth) (**Privacy Act**) and other privacy laws and regulations that apply to us.

This privacy policy (**Privacy Policy**) explains how Oktopi collects, uses, protects and shares personal information in connection with:

- the provision of its Oktopi products and associated training and support services (together, the **Services**) to individuals or entities who have entered into agreements with Oktopi for the provision of the Services (**Customers**); and
- any other interactions a person may have with Oktopi in connection with the Services (including via our website or if a person speaks with us over the phone).

Please note the relevant Customer who is a party to the agreement with Oktopi for the provision of the Services will control the data it provides in its instance of the Services and is responsible for the personal information it discloses to Oktopi.

This Privacy Policy does not apply to the collection and handling of personal information by:

- any of the Customers;
- any third party websites, applications or software that integrate with the Services or any other third party products, services, or businesses; and
- Oktopi in connection with human resources (such as if you are an employee of Oktopi or if you are applying for a job with Oktopi).

### What personal information do we collect?

The personal information we collect about you depends on the nature of your dealings with us or what you choose to share with us.

The personal information we collect about you may include:

- name;
- contact details (eg mailing or street address, email address, phone number);
- identification details (eg date of birth);
- work details (eg occupation, role, organisation, qualifications);
- details of interactions and activity (eg communications, enquiries, complaints, transactions and activity relating to the Services and our website);
- preferences, interests and opinions (eg preferences about communications with us);
- information on how the Services are accessed and used, as well as usernames and passwords; and
- information about your device (eg desktop, laptop, phone, tablet) used to access the Services such as connection type and settings, operating system, browser type, IP address, time zone settings, the time spent on webpages, unique device identifiers and other diagnostic data).

Certain aspects of your personal information (eg your name and other contact details) are required for the Services, and if you or a Customer you work for fails to provide such information, we may not be able to provide you or that Customer with the Services in full and your and that Customer's enjoyment of the Services may be more limited.

### **How do we collect personal information?**

We may collect personal information directly from you when you when:

- you provide it to us directly (eg when you use the Services or if you contact us directly);
- we create records of your activity (eg through your use of the Services); and
- we create it based on other information that we hold (eg by performing analysis and reviews).

We may also collect your personal information from third parties or through publicly available sources, for example we may collect information from:

- Customers during the term in which they use our Services;
- your representatives and representatives of a Customer you work for; and
- the parties we share personal information with, as described below.

We may also collect your personal information automatically (eg via cookies and log data relating to use of the Services, where these are collected in a form that can be reasonably linked to your identity).

If you provide personal information of another person, you must have their consent to provide their personal information, having explained why you are providing it and how they can find this Privacy Policy on our website.

### **Why do we collect, use, and disclose your personal information?**

We use and disclose personal information for operating our business, including for the following purposes:

- to provide and deliver the Services to our Customers and to administer and maintain the performance of the Services;
- to allow you to access and use the Services (including authentication) if you work for a Customer who is accessing and using the Services;
- to provide you with assistance and support in relation to your use of the Services;
- to research, improve, and develop the Services, and to allow you to participate in surveys or interactive features of our Services and our website when you choose to do so;
- to communicate with you about the Services and deliver information regarding new product features and other general information about the Services which are similar to those you already use unless you have opted not to receive such information;
- to manage our relationships with you and our Customers;
- to personalise and optimise your experience when using the Services and our website;
- to generate de-identified statistical data which we may use for any lawful purposes once it is no longer personal information (eg to uncover collective insights about the use of our Service);
- to protect the safety and security of the Services and our premises, people, systems and assets, including detecting and responding to security incidents and other malicious or unlawful activity, and to detect, prevent and address technical issues;

- for Oktopi's legitimate business interests including for fulfilling and exercising our obligations and rights (including in circumstances where we are required to comply with regulatory orders and audit processes) and for managing legal claims;
- to verify your identity and information and to detect fraud and potential fraud, including fraudulent payments and fraudulent use of the Services;
- in connection with a sale or restructure of, or acquisition by, our business (including assessing potential transfers and managing transitional arrangements); and
- other purposes with your consent or otherwise in accordance with applicable law.

### **Who do we share your personal information with?**

Oktopi may share personal information with various third parties, including:

- third party service providers that perform services for us or connect or interface with the Services (eg cloud hosting providers, data storage services, third party applications and providers of financial, marketing, research, investigation and insurance services);
- our lawyers, accountants, and professional advisors; and
- law enforcement authorities and government agencies where we are required or permitted to do so by law, or as a result of a legal process.

Some of the third parties we disclose personal information to may be based in or have servers located outside of Australia, including in the United States of America.

### **How do we hold and protect your personal information?**

We may hold your personal information in physical or digital form. In some cases, we may use third parties to store your information.

In any event we implement and maintain security controls to help protect the data we hold (including personal information) against loss, misuse and unauthorised access and disclosure. Some of the controls we use, depending on the circumstances, include data access restrictions, firewalls, anti-virus software, encryption and security training for our staff.

Please note no security system is impenetrable and due to the inherent nature of the Internet, we cannot guarantee that information, during transmission through the Internet or while stored on our systems or otherwise in our care, is absolutely safe.

### **Cookies**

We also use 'cookies' to collect information and improve our website and Services. A cookie is a piece of information that allows our website to identify and interact more effectively with your browser. We may use cookies to help maintain the continuity of your browsing session, remember your details and preferences, save login details, and monitor website usage and traffic.

You can instruct your browser, by changing its options, to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit. However, if you do not accept cookies, you may not be able to use all aspects of the Services and our website.

Our website may also use third party website tools from time to time, for example Google Analytics to help us understand website usage. For more about how Google collects and processes data, please see Google's privacy policy and their information at <https://policies.google.com/technologies/partner-sites>.

### **Your rights in relation to personal information**

If you wish to make a request to access or correct the personal information we hold about you, you should make a request by contacting us (see 'how to contact us' below) and we will usually respond within 30 days. We may ask to verify your identity and may request payment of a reasonable, cost-based fee before providing access.

Please provide as much detail as you can about the particular information you seek, in order to help us locate it.

We may deny your request for access or correction, and if we do, we will tell you why. If we do deny your request, you can ask us to make a note of your requested correction with the information.

In certain circumstances we may only hold your personal information because we are providing the Services to one of our Customers. In those circumstances, it may be more appropriate for you to exercise your rights through the relevant Customer rather than through Oktopi, in which case we will advise you to do so if you contact us in the first instance. Please note Oktopi is not responsible for the privacy or security practices of our Customers who may have different practices than described in this Privacy Policy.

### **Enquiries and complaints**

If you have a question or concern about how we handle, process or manage your personal information, please contact us (see 'how to contact us' below). Note we may require proof of your identity and further details of your request, and may need to engage or consult with other parties in order to investigate and deal with your complaint.

We will keep records of your request and any resolution.

Please allow up to 30 days for us to respond to your complaint. It will not always be possible to resolve a complaint to everyone's satisfaction. If you are not satisfied with our response to a complaint, you have the right to contact the Office of Australian Information Commissioner (at [www.oaic.gov.au/](http://www.oaic.gov.au/)) to lodge a complaint.

### **Notice to end users**

If you use our Services with an account provided by an organisation you are affiliated with, such as your work account (eg if a Customer of Oktopi employs you and instructs you to use our Services), we may collect and use and disclose personal information about you to provide services to you or the organisation, in accordance with the instructions of the organisation. Please note your organisation will generally be able to access and handle your data. You should refer to your organisation's privacy policy for more information about how they collect and handle your personal information, and how you may exercise your right in respect thereof.

### **How to contact us**

- **Email**  
info@oktopi.com
- **Post**  
Attention: Oktopi Privacy Officer  
Address: PO Box 561, Aireys Inlet VIC 3231, Australia