

## Privacy Policy

Last updated 25<sup>th</sup> January 2024

Your privacy is important to ComConX Pty Ltd and we value the protection of your personal information. Our privacy policy (**this Policy**) outlines how we collect, use, store and most importantly, how we protect your information.

### This Policy

ComConX Pty Ltd (A.C.N. 668 115 197) (**ComConX**) owns and operates the application called FumConX (**Application**) which is a software application designed to create efficient communication between fumigators and their respective clients whilst maintaining electronic records which has been customised for iOS and Android Devices.

This Policy explains how ComConX collects, uses, maintains and discloses information collected about you, including when you visit our website or use our (**Services**) such as when you:

- Download and use the Application or any other application of ComConX that links to this Policy; or
- Engage with ComConX in any other related way, including any sales, marketing, or events.

When you use or access our Services or otherwise interact with us, we may collect a variety of information about you that contains information that identifies you or may be combined with other information to identify you (your “personal information”).

This Policy describes your choices regarding use, access, deletion, and correction of your personal information. By submitting your personal information to us, interacting with our website, or using our Services, you acknowledge and agree to the processing of your personal information as set out in this Policy. If you do not agree to this Policy, you should not use our Services or interact with our website.

### Why ComConX collects your personal information

We process your information only when it is reasonably necessary for us to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We may collect this personal information from you or others acting on your behalf (e.g. your employer), from third parties, or automatically through the use of the Services or the Application.

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

- To verify your identity;
- To facilitate account creation, authentication and otherwise manage user accounts;
- To deliver and facilitate the delivery of our Services to you;
- To manage the Services we are providing you;
- To confirm the compatibility of the Service or the Application with your hardware;
- To respond to user inquiries/offer support to users;

- To send administrative information to you;
- To best manage our own business;
- For quality improvement;
- To enable user-to-user communications;
- Statistical reporting (including benchmark reports) on the Services we provide;
- To identify usage trends;
- To evaluate and improve our Services, products, marketing, and your experience;
- To provide you with practice support;
- Research for Application updates; and
- To comply with all our legal and regulatory obligations.

Where permitted by applicable law and our obligations in contracts with our clients, we may aggregate your non-personally identifiable data and use this data to analyse or improve our Services.

### **How ComConX collects your personal information**

ComConX collects most of the personal information directly from you. For example, when you fill in a form online on our website, contact us or use the Application or any other application of ComConX.

ComConX automatically collects certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services and for our internal analytics and reporting purposes.

Additionally, ComConX may also collect information from your online activity by way of:

- The Application;
- Site performance identifier; or
- Analytic or advertising “cookies” or digital identifiers. We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information.

### **The type of personal information ComConX collects**

The type of information ComConX collects relates directly to what is reasonably necessary for ComConX’s business activities and can include a wide range of personal information. In that regard, the personal information that ComConX collects depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

- Names;
- Phone numbers;
- Email addresses;
- Mailing addresses;
- Job titles;
- Usernames;
- Passwords;
- Contact preferences; and
- Billing addresses.

We do not process sensitive information.

Additionally, if you use the Application or any other application of ComConX, we may collect the following information if you choose to provide us with access or permission:

- **Geolocation Information.** We may request access or permission to track location-based information from your mobile device, either continuously or while you are using our mobile application(s), to provide certain location-based services. If you wish to change our access or permissions, you may do so in your device's settings;
- **Mobile Device Access.** We may request access or permission to certain features from your mobile device, including your mobile device's reminders, and other features. If you wish to change our access or permissions, you may do so in your device's settings;
- **Mobile Device Data.** We automatically collect device information (such as your mobile device ID, model, and manufacturer), operating system, version information and system configuration information, device and application identification numbers, browser type and version, hardware model Internet service provider and/or mobile carrier, and Internet Protocol (IP) address (or proxy server). If you are using our application(s), we may also collect information about the phone network associated with your mobile device, your mobile device's operating system or platform, the type of mobile device you use, your mobile device's unique device ID, and information about the features of our application(s) you accessed; and
- **Push Notifications.** We may request to send you push notifications regarding your account or certain features of the application(s). If you wish to opt-out from receiving these types of communications, you may turn them off in your device's settings.

This information is primarily needed to maintain the security and operation of ComConX's Application(s), for troubleshooting, and for our internal analytics and reporting purposes.

All personal information that you provide to ComConX must be true, complete, and accurate, and you must notify ComConX of any changes to such personal information.

### **How ComConX holds your personal information**

Personal information may be received and held either as a hard copy, paper, or a soft copy being electronic data, in any available form. In either case, we take the security of personal information very seriously. We use cyber-security systems and technical security measures to protect your personal information.

We additionally keep your personal information in controlled systems that are protected with authorised access only and prevent copying of your personal information.

### **Who ComConX may share your personal information with**

Where permitted by applicable law, we may share your personal information to third parties to deliver the Services or serve our legitimate interests. These may include:

- Technicians we engage to ensure your Service is working,
- Fraud-checking and authorised security agencies;
- When we use Google Maps Platform APIs, we may share your information with certain Google Maps Platform APIs (e.g. Google Maps API, Places API).
- Our affiliates, in which case we will require those affiliates to honour this privacy notice. Affiliates include our parent company and any subsidiaries, joint venture partners, or other companies that we control or that are under common control with us.

- Our professional advisors or contractors, for example our auditors, accountants or lawyers;
- Market research and customer review organisations who can assist us in developing the quality of our service and product;
- Digital advertising platforms we use to advise you of our product and services; and
- Any authorised government or regulatory authority or enforcement agency where we are required or specifically permitted under law to.

## **Marketing and advertising**

ComConX does try to keep its customers up-to-date with what we can offer and give our customers the option to opt into our direct marketing to record their interest in receiving this

## **What Are Your Privacy Rights**

You have the option to not share information with us and you can withdraw your consent at any time. If you choose to withdraw your consent and not to share your personal information with us, you may be unable to fully use the Application or our Services.

To submit a request or complaint regarding our processing of your personal information, please contact us via the details outlined in “How to Contact ComConX” below.

For us to facilitate your request, please identify the type (or scope) of information that you do not wish to share, or any other concerns or requests you may have. Once we receive your request, we will contact you to verify your identity and we may ask you for additional information before actioning your request.

## **How to access your personal information**

You are welcome to ask us for details of any personal information we hold at any time. Usually, this will be done at no cost however, if your request is particularly complex or requires a detailed search of our records, there may be an associated charge.

Should you have questions, or concerns regarding your privacy or personal information, please contact us via the details outlined in “How to Contact ComConX” below.

## **How to Contact ComConX**

For all general inquiries, complaints, questions or claims concerning this Policy, please contact:

ComConX Pty Ltd  
PO Box 18128  
Clifford Gardens Queensland 4350  
Australia  
info@comconx.au