1. Policy Title

Privacy Policy

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2. Purpose

The purpose of this policy is to outline how **INSIGHTED PTY LTD (ACN 145 077 532) ("Insighted")** collects, uses, stores, and protects personal information in accordance with the **Privacy Act 1988 (Cth)** and the **Australian Privacy Principles (APPs)**.
This policy also explains how individuals may access or correct their information, how complaints are handled, and how overseas disclosures are managed.

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3. Scope

This policy applies to:

- All personal information collected by **Insighted**, including via our website (**www.otdraw.com**) and through the use of our software.
- All employees, contractors, and service providers who handle personal information on behalf of Insighted.

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4. Definitions

- **Personal Information**: Information or opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not, and whether recorded in material form or not.
- **Sensitive Information**: A subset of personal information that includes details such as health data, financial data, and government identifiers.
- **Data Breach**: Unauthorised access to, disclosure of, or loss of personal information.
- **Notifiable Data Breach (NDB)**: A breach likely to result in serious harm, which must be reported to the OAIC and affected individuals.

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5. Policy Statements

Insighted commits to:

1. Collecting only the personal information necessary to provide our services.
2. Using personal information solely for legitimate business purposes.
3. Protecting personal information with appropriate security measures.
4. Notifying individuals and the OAIC of eligible data breaches in accordance with the **NDB Scheme**.
5. Providing transparency on overseas disclosures and third-party service providers.
6. Allowing individuals to access and correct their personal information.

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6. Roles & Responsibilities

- **Executive Management**: Ensures compliance with privacy obligations and resources for protection.
- **Privacy Officer**: Manages privacy compliance, complaints, and access/correction requests.
- **Employees & Contractors**: Must follow this policy when handling personal information.
- **Third-Party Service Providers**: Must comply with contractual privacy and security requirements.

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7. Procedures / Implementation

7.1 Information Collected

We may collect personal information including:

- Name, organisation name, username, email address, phone number, and postal address.
- Payment details (e.g., credit card).
- Device details (location, name, usage).
- Information provided through website forms or registration processes.
- Cookies and analytics data to enhance website experience (not personally identifiable).

7.2 Collection Methods

- Directly from you when you enter information on our website or software.
- Through the use of cookies and analytics tools.
- From service providers assisting in account setup and management.

7.3 Use of Personal Information

Personal information is used for:

- Providing, maintaining, and improving our software and services.
- Account creation, authentication, and billing.
- Customer support.
- Direct marketing (with consent and opt-out options).

7.4 Disclosure of Personal Information

- To service providers who support website operation and account management.
- To maintenance and support personnel in the normal course of business.
- To overseas recipients where necessary:
    - Certain account management functions use **SoftwareKey** (USA).

7.5 Overseas Transfer

- Your personal information will not be disclosed to recipients outside Australia, except as set out below, unless you expressly request us to do so. If you request us to transfer your personal information to an overseas recipient, the overseas recipient will not be required to comply with the Australian Privacy Principles and we will not be liable for any mishandling of your information in such circumstances.

- Insighted discloses some personal information to overseas recipients in the form of utilising third party software for account set up and management purposes. Such overseas recipients are located in the United States of America.

- This third party software provider is called SoftwareKey and their own privacy policy can be found here: https://www.softwarekey.com/company/privacy-policy/
  By using the Software, you consent to this disclosure, as such disclosure is required for the operation of the Software.

7.6 Data Security & Retention

- Personal information will be stored securely using encryption, access controls, and monitoring.
- Retention periods will comply with business and legal requirements.
- Data no longer required will be securely destroyed.

7.7 Direct Marketing

- Individuals who register to use our software consent to receiving marketing communications.
- You may opt out of marketing at any time.
- Sensitive information will not be used for marketing.

7.8 Access & Correction

- Individuals may request access to or correction of their personal information.
- Requests should be sent to the Privacy Officer (see Section 13).
- Requests will be processed in accordance with **APPs 12 and 13**.

7.9 Complaints

- Complaints should be directed to the Privacy Officer.
- We will investigate and respond within a reasonable timeframe.
- If not resolved, complaints may be escalated to the **Office of the Australian Information Commissioner (OAIC)**.

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8. Monitoring & Compliance

- Privacy compliance will be reviewed annually.
- Privacy risks will be assessed as part of the **Risk Assessment & Management Policy**.
- Eligible data breaches will be reported under the **NDB Scheme**.

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9. Risk Management

- Privacy risks will be documented and managed in accordance with Insighted's risk management framework.
- Third-party vendors handling personal information will be assessed through supplier due diligence.

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10. Training & Awareness

- Employees will receive annual training on privacy obligations and handling personal information.
- Staff in high-risk roles (e.g., IT, customer support) will receive additional training.

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11. Related Policies & References

This policy should be read alongside:

- Information Security Policy
- Data Protection Policy
- Incident Response Policy
- Risk Assessment & Management Policy
- Supplier / Third-Party Risk Management Policy

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12. Review & Update

- This policy will be reviewed **annually**, or when there are significant changes to legislation or business practices.
- Responsible Officer: **Privacy Officer**

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13. Approval

- Approved by: Mitch Hubbard (Director and Privacy Officer – Insighted Pty Ltd)
- Date Approved: 18/08/2026
- Next Review Date: 18/08/2027