

PRIVACY POLICY

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1. Introduction

Aurora Global Pty Ltd ACN 55 600 473 630, related bodies corporate and related entities (**Aurora**, **we** or **us**) collects personal information needed for its business activities and generally relates to individuals' personal information in their business or professional capacities, as a consequence of a business or potential business relationship with those individuals or the organisations they work for.

Aurora is committed to protecting an individual's privacy and ensuring transparency. This privacy policy sets out:

- What information we collect.
- How we use the information we collect.
- How we share the information we collect.
- How we store and secure the information we collect.

As our services are primarily offered to businesses and professionals, the use of our services may also be subject to the individual's principal's policies.

Aurora usually does not need to collect any sensitive information (as defined in the Privacy Act 1988 (Cth) (**Australian Privacy Act**) and, if it needs to do so, it will strictly comply with the Australian Privacy Principles.

This Privacy Policy does not limit or exclude any rights that an individual may have or may have under the Privacy Act or under any other applicable law.

2. What information we collect

2.1. Information provided by your organisation

If an individual uses services we provide to an organisation (**our customer**), we collect that individual information when our customer uses certain Aurora services, such as Aurora's proprietary Project Management and In-Field Data Capture platform delivered via web browser, mobile applications, and APIs (**Aurora Platform**) that requires our customer to create or modify an account on the individual's behalf. The information we collect may include the person's name, email address, organisation, organisation ID number and work location.

2.2. Information provided by an individual

As like in clause 2.1, we may collect personal information, including the person's name, email address, organisation, organisation ID number and work location, that an individual enters or uploads as and when that person interacts with or uses certain of our services. We also keep track of an individual's preferences and settings when using certain Aurora services. We may also collect information from an individual when that person interacts with or contacts Aurora's Customer Support or when contacting us through our website.

2.3. Information automatically collected by Aurora Platform

If an individual is using the Aurora Platform, we collect information about the user's interactions with the platform, including features used, links clicked on, the user's device information and the user's connection information using cookies and other tracking technologies.



3. How we use the information we collect

3.1. For user authentication, authorisation and service delivery

We use the information collected to authenticate a user and grant the user access to and use of the Aurora Platform. We also use your information to allow the person to interact with certain Aurora services.

3.2. For personalisation and customisation

We may use the information collected to personalise and tailor the Aurora Platform to optimise the user's experience. This includes customising the content and features a user sees based on certain settings and usage, such as permissions, user preferences, usage patterns and other relevant information.

3.3. For security and fraud prevention

We use the information collected to monitor and maintain the security of our application and protect against unacceptable use, unauthorised access, data breaches and other potential threats.

3.4. For platform and service improvement

We use the information collected to monitor and analyse the Aurora Platform usage, identify areas for improvement, and develop new features and enhancements. This allows us to continuously improve the Aurora Platform and provide a better user experience.

3.5. For customer support

We may use the information collected to provide customer support and assistance, respond to user inquiries, and address any issues or concerns that may arise.

3.6. For legal compliance

We may use the information collected to comply with applicable laws, regulations, and legal obligations, as well as to protect our rights and interests, including the enforcement of our terms of service and other agreements.

3.7. For other purposes

We may use the information collected for other purposes as disclosed at the time of collection or when we have obtained our customer's consent or an individual's consent.

We will always seek an individual's consent where required and provide that individual with the option to opt-out of data collection and usage for certain purposes.

4. How we share the information we collect

4.1. With the customer

Some Aurora Platform features such as notes, reports and dashboards may display the individual's user profile information to other users within the same customer organisation.



Aurora may also share the individual's user information with our customer through delivery of Aurora Platform usage and utilisation reports. This may be used by our customer to enforce the terms and conditions governing the use of the Aurora Platform by that individual.

4.2. With our service delivery partners

We may share information with our delivery partners for assistance with any reporting, financial processing, consulting and technical services required by Aurora.

4.3. With 3rd party products and services

We may share information with products and services in the list below to assist us with the operation, improvement, and optimisation of Aurora's services.

- Microsoft Azure
- Data Dog
- · Hangfire, and
- HIVE.

We may also share the individual's personal information with the individual's principal's (our customer's) systems and applications.

We will ensure there is a contract in place with the recipients listed above which include obligations in relation to the confidentiality, security, and lawful processing of any personal information shared with them.

4.4. With the individual's consent

We may share information about an individual with 3rd parties when that individual gives us consent to do so.

5. How we store and secure information we collect

5.1. Data storage and security

Information stored on devices: the Aurora Platform stores information on the individual's user device while it operates in offline-mode, Information is protected with encryption and file-system security measures. The Aurora Platform also stores information with cloud-hosting service providers based in Australia.

Information Stored on Cloud-Hosted Storage: all collected information is encrypted while in-transit and atrest, using industry-standard encryption methods to prevent unauthorised access. All Network communication is secured using SSL (Secured Sockets Layers) protocols.

5.2. Security frameworks

To further protect the information we collect, the Aurora Platform employs a Zero Trust Architecture (ZTA) security framework. This framework requires constant verification of users, devices and access permissions intended to ensure the highest level of security.

Additionally, the Aurora Platform protects user information by implementing authentication and authorisation mechanisms, such as OAuth2 and multi-factor authentication (MFA). These mechanisms are intended to ensure that only authorised users can access the application and the stored data.



5.3. Confidentiality

We take all reasonable steps to ensure Aurora staff protect an individual's personal information and are aware of their information security responsibilities. Access to an individual's information is granted on a need-to-know basis, following the principle of least privilege access.

Where an individual has a username, password or any other identifying information that grants that person access to certain Aurora services, it is that person's responsibility to keep this information confidential and not to share password or login details with others.

5.4. Data Retention

If an individual uses an Aurora service that has been provided to our customer, we will retain that person's information for as long as it is necessary for us to continue providing that service to our customer. Otherwise, an individual's information is retained by Aurora for as long as it is necessary or as required by law. Aurora follows industry-standard data retention policies and deletes data when it is no longer needed.

Note that while the field mobile application has a feature that allows the user to delete data, that data is removed from the user's device only. The Aurora Platform will retain a copy of this information on cloud-hosted storage.

5.5. Data breach and notice

In the event of a data breach, we are committed to taking prompt action to investigate, mitigate and address the breach.

We will notify affected organisations and relevant authorities in accordance with applicable data protection laws and regulations. Aurora is continuously working to improve its security measures and stay up to date with the latest advancements in data security to minimise the risk of data breaches.

5.6. Security Disclaimer

While these safeguards are designed to protect an individual's information, no security system is entirely impenetrable and due to the inherent nature of the internet we cannot guarantee that data during transmission through the internet or while stored on our systems or otherwise in our care is entirely safe from intrusion by others. Therefore, the transmission of information via the internet is not completely secure, and any transmission is at the individual's own risk.

6. An individual's rights and how to exercise them

6.1. Accessing the individual's personal information

An individual has who has provided personal information to Aurora has the right to request access to that information. We will provide you with this information within a reasonable timeframe and in accordance with applicable laws and regulations.

6.2. Correcting inaccurate personal information

If an individual believes the personal information we hold about that person is inaccurate or incomplete, that person has the right to request that we correct or update it.



6.3. Erasure

An individual has the right to request that we delete that person's personal information in certain circumstances, such as when it is no longer necessary for the purposes for which it was collected or when that person withdraws consent with respect to the purpose for which the personal information was collected in the first instance. If the individual is a user of Aurora's services, then the deletion of that individual's personal information may compromise the ability of that person from being able to continue to use certain Aurora's services.

6.4. Objection

An individual has the right to object to the processing of that person's personal information in certain circumstances, such as when we are using it for direct marketing purposes or when we are relying on our legitimate interests as the basis for processing.

6.5. Restriction processing

An individual has the right to request that we restrict the processing of that person's personal information in certain circumstances, such as when that person believe that the information, we hold is inaccurate or when that person has objected to our processing.

6.6. Data portability

An individual has the right to receive a copy of that person's personal information in a structured, commonly used and machine-readable format.

6.7. Exercising an individual's rights

To exercise any of these rights, please contact us using the contact details provided in this privacy policy. We will respond to such a request within a reasonable period and in accordance with applicable laws and regulations.

Please note that in some cases, we may be unable to comply with an individual's request, such as when we are required to retain that person's personal information subject to that person's organisation's policies or for legal or legitimate business purposes. If we are unable to comply with a request, we will explain the reasons why.

7. Updates to this policy

Occasionally, we may make changes to this privacy policy. Any alterations to the policy will be displayed at www.auroraglobal.com.au/privacypolicy, and if the changes are substantial, we may draw attention to them by posting the updated policy on the Aurora Platform or by sending an email notification to the email address associated with a user's account. It is the individual's responsibility to review the privacy policy periodically, to remain informed about our data management practices and ways to help to safeguard that person's privacy.

8. How to contact Aurora

If an individual any questions, concerns, or requests related to our privacy policy, data protection practices, or that person's personal information, please contact us using any of the following methods:



- Email: privacy@auroraglobal.com.au
- Mailing Address: Aurora Global, Attn: Data Protection Officer, Level 4, Mia Yellagonga Tower 2, 5 Spring St, Perth WA 6000

Our Data Protection Officer (**DPO**) will respond to all inquiries, including:

- Accessing, correcting, or updating personal information
- Exercising right to erase or data portability
- Restricting the processing of personal data
- Withdrawing consent for data processing, where applicable
- Addressing any concerns or complaints about our data protection practices