

## Privacy Policy

*Updated 27 October 2021*

Cloudpractice Pty Ltd trading as Practifi and its subsidiaries and affiliates (“Practifi” or the “Company”, “We”, “Us”, “Our”) is committed to secure and trustworthy Internet commerce and the individual’s right to privacy. This Privacy Statement describes how we handle your personal information.

We urge you to read this Privacy Policy so that you understand our commitment to you and your privacy, and how you can participate in that commitment. When you visit our websites, or provide personal information to us through other means, you consent to the use of your information as described in this Privacy Policy.

### 1. Introduction

This Policy details our commitment to protecting the privacy of individuals who:

- a. visit our Websites (defined below) (“Website Visitors”) or individuals who request us to contact them via our online web forms;
- b. who register to use the products and services which we market for subscription available at [www.Practifi.com](http://www.Practifi.com) (the “Service(s)”); or
- c. attend or register to attend webinars, sponsored events or other events at which the Practifi participates (“Attendees”).

For the purposes of this Policy, the term “Websites” shall refer collectively to [www.practifi.com](http://www.practifi.com) as well as the other websites that Practifi operates and that link to this Policy. This Policy describes how We collect, use, share and secure the personal information that you provide. It also describes your choices regarding use, access and correction of your personal information.

Our Websites may contain links to other websites. We are not responsible for the information practices or the content of such other websites. If you submit personal information to any of those sites, your information is governed by their privacy statements. We encourage you to carefully read the privacy statement of any website you visit.

Our Websites also include social media features, such as the Twitter button and widgets or interactive mini-programs that run on our site. These features may collect your IP address, the page you are visiting on our site, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our website. Your interactions with these features are governed by the privacy statement of the company providing it.

### 2. Information Collected

When expressing an interest in obtaining information about Practifi and its products and services, We will ask for personal contact information.

As you navigate the Company's websites, We may also collect information through the use of commonly-used information-gathering tools such as web beacons and cookies.

Information collected includes standard information from your web browser such as your IP address, browser type, operating system, referring/exit pages, links clicked and actions taken while browsing.

When you purchase the Company's products or services, We will collect billing and profile information.

### **3. Use of Information collected**

We may use the information we collect about you (including personal information, where applicable) in order to perform our obligations under our Master Subscription Agreement with you and on the basis of our legitimate interest including to;

- a. provide, operate, maintain, improve, and promote the Websites and the Services;
- b. enable you to access and use the Websites and the Services;
- c. process and complete transactions, and send you related information, including purchase confirmations and invoices;
- d. send transactional messages, including responses to your comments, questions, and requests; provide customer service and support; and send you technical notices, updates, security alerts, and support and administrative messages;
- e. send promotional communications, such as providing you with information about products and services, features, surveys, newsletters, offers, promotions, contests, and events; and provide other news or information about us and our partners (you can opt-out of receiving marketing communications from us by following the unsubscribe instructions included in our marketing communications);
- f. monitor and analyse trends, usage, and activities in connection with the Websites and Services and for marketing or advertising purposes;
- g. investigate and prevent fraudulent transactions, unauthorised access to the Websites and the Services, and other illegal activities;
- h. personalize the Websites and Services, including by providing features or advertisements that match your interests and preferences; and
- i. for other purposes for which we obtain your consent.

#### **Legal basis for processing Personal Information (EEA Visitors)**

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it. However, we will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information). Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

## **4. Sharing of Information Collected**

### **Service Providers**

We share information, including personal information, with our third-party service providers that we use to provide hosting for and maintenance of our Websites, application development, backup, storage, payment processing, analytics and other services for us. These third-party service providers may have access to or process your personal information for the purpose of providing these services for us. We do not permit our third-party service providers to use the personal information that we share with them for their marketing purposes or for any other purpose than in connection with the services they provide to us.

We may also share aggregated and/or anonymized information regarding your use of the Services with third parties for marketing purposes based on our legitimate interest to develop and promote Service(s). However, we would never identify you, your Agents or End-Users as the source of the information.

We may collect, and we may engage third-party analytics providers to collect, metrics and information regarding your use of the Service, including evaluating how Agents and End-Users use the Service (“Usage Data”), to develop new features, improve existing features or inform sales and marketing strategies, based on our legitimate interest to improve the Services. When we process Usage Data, any personal information shall be anonymized. Any such third-party analytics providers will not share or otherwise disclose Usage Data, although we may make Usage Data publicly available from time to time.

### **Compelled Disclosure**

We reserve the right to use or disclose your Personal Information if required by law or if we reasonably believe that use or disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or comply with a law, court order, or legal process.

### **Customer Testimonials**

Practifi may post lists of customers and testimonials on the Company’s websites that contain information such as customer names and titles. To request removal of your personal information from our blog or forum, or to have reference to you or your company removed, or to have your testimonials removed, contact us at [privacy@Practifi.com](mailto:privacy@Practifi.com).

### **International Transfer of Information Collected**

To facilitate Practifi’s global operations, the Company may access such information from around the world, including from other countries in which the Company has operations. This Privacy Statement shall apply even if Practifi transfers data about customers to other countries.

## 5. Website Navigational Information

Practifi uses commonly-used information-gathering tools, such as cookies and web beacons, to collect information as you navigate the Our websites (“Website Navigational Information”). This section describes the types of website navigational information that may be collected on the Company’s websites and how this information may be used.

### Cookies and Other Tracking Technologies

A cookie is a small text file that is stored on a user’s computer for record-keeping purposes. Technologies such as: cookies, beacons, tags and scripts are used by Practifi and some of our business partners (e.g., our tracking utility company), affiliates, or analytics or service. These technologies are used in analysing trends, administering the site, tracking users’ movements around the site and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis.

We use session cookies to make it easier for you to navigate our site. A session ID cookie expires when you close your browser. Cookies enable us to track and target the interests of our users to enhance the experience on our site.

Enabling these cookies is not strictly necessary for the website to work but it will provide you with a better browsing experience. You can delete or block these cookies, but if you do that some features of this site may not work as intended.

### How to Control Cookies

You can control and/or delete cookies as you wish. You can delete all cookies that are already on your computer and you can set most browsers to prevent them from being placed. If you do this, however, you may have to manually adjust some preferences every time you visit a site and some services and functionalities may not work.

### Web Beacons

Practifi may use web beacons alone or in conjunction with cookies to compile information about customers and visitors’ usage of the Company’s websites and interaction with emails from the Company. Web beacons are clear electronic images that can recognise certain types of information on your computer, such as cookies, when you view a particular website tied to the web beacon, and a description of a website tied to the web beacon. For example, Practifi may place web beacons in marketing emails that notify the Company when you click on a link in the email that directs you to one of the Company’s websites. Practifi uses web beacons to operate and improve the Company’s websites and email communications.

Practifi may use information from web beacons in combination with data about customers to provide you with information about the Company and services.

### Log Files

As is true of most websites, we gather certain information automatically and store it in log files. This information may include internet protocol (IP) addresses, browser type, internet

service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. We may combine this automatically collected log information with other information we collect about you. We do this to improve services we offer you.

## 6. Your Data

From time to time Practifi's customers may submit data or information to the Practifi Service for hosting and processing purposes. We will not review, share, distribute, or reference any such data except as provided in the Our Master Subscription Agreement, or as may be required by law. In accordance with Our Master Subscription Agreement, We may access such data only for the purpose of providing the Service, preventing or addressing service or technical problems, at a customer's request in connection with customer support matters, or as may be required by law.

### Service Provider, Sub-Processors/Onward Transfer

We may transfer personal information to companies that help us provide our Service. Transfers to subsequent third parties are covered by the provisions in this statement regarding notice and choice and the service agreements with our customers.

### Integrated Systems

Practifi's customers may integrate other systems, including those available via the Salesforce.com AppExchange, into the Practifi Service for their own business purposes. We have no visibility over the privacy controls within those systems. Practifi's customers should familiarise themselves with the privacy controls of those systems.

### Access to Data Controlled by our Customers

Typically, Practifi is a data processor and has no direct relationship with the individuals whose personal data it processes. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data should direct queries to the appropriate Practifi customer. If a customer requests our assistance in the removal of data we will respond to such requests within 15 business days.

### Data Retention

Practifi will retain your information (including customer data we collect on behalf of our customers) for as long as is needed to provide the Practifi Service, and as necessary to comply with our legal obligations, resolve disputes, enforce our agreements, or as otherwise reasonably necessary for our business purposes.

### salesforce.com

Practifi's customer data and the data stored by Our customers is stored on Salesforce.com. Practifi customers should ensure they have read and understood Salesforce.com's privacy policy as published at their website [www.salesforce.com](http://www.salesforce.com).

## 7. Security

The security of your personal information and our customers' information is important to us. When you enter sensitive information (such as login credentials) on our platform login, we encrypt the transmission of that information using industry standard TLS. We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. No method of transmission over the

Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security. If you have any questions about our security you can contact us at [privacy@Practifi.com](mailto:privacy@Practifi.com).

## 8. Updating your Personal Information

To review and update your personal information to ensure it is accurate, contact us at [privacy@Practifi.com](mailto:privacy@Practifi.com). We will respond to all requests for access, to correct inaccurate data, update information, or delete information within 15 business days.

If you would like to update or change your password, you may click on the “Forgot your password?” link on the login page. You will be required to provide your username then a system generated password will be created and sent to the email address indicated on your profile. The email will contain a link where you can change your password.

## 9. California Privacy Rights

This section applies only to California consumers. The California Consumer Privacy Act (“CCPA”) requires businesses to disclose whether they sell Personal Data. Practifi is a business, and does not sell Personal Data. We may share Personal Data with third parties if those third parties are authorized service providers or business partners who have agreed to our contractual limitations as to their retention, use, and disclosure of such Personal Data.

If you are unable to access this Privacy Policy due to a disability or any physical or mental impairment, please contact us and we will supply you with the information you need in an alternative format that you can access.

For purposes of this section “Personal Information” has the meaning given in the California Consumer Privacy Act (“CCPA”).

### How We Collect, Use, and Share your Personal Information

We have collected the following statutory categories of Personal Information in the past twelve (12) months:

- a. Identifiers, such as name, e-mail address, mailing address, and phone number. We collect this information directly from you or from third party sources.
- b. Commercial information, such as subscription records. We collect this information directly from you.
- c. Internet or network information, such as browsing and search history. We collect this information directly from your device.
- d. Geolocation data, such as IP address. We collect this information from your device.
- e. Financial information, such as Payment Information or financial account numbers in the process of providing you with a subscription. We collect this information from you.
- f. Inferences.
- g. Other personal information, in instances when you interact with us online, by phone or mail in the context of receiving help through our help desks or other support channels; participation in customer surveys or contests; or in providing the Subscription Service.

The business and commercial purposes for which we collect this information are described

in Section 2 of this Privacy Policy. The categories of third parties to whom we "disclose" this information for a business purpose are described in Section 4 of this Privacy Policy.

### Your California Rights

You have certain rights regarding the Personal Information we collect or maintain about you. Please note these rights are not absolute, and there may be cases when we decline your request as permitted by law.

The right of access means that you have the right to request that we disclose what Personal Information we have collected, used and disclosed about you in the past 12 months.

The right of deletion means that you have the right to request that we delete Personal Information collected or maintained by us, subject to certain exceptions.

The right to non-discrimination means that you will not receive any discriminatory treatment when you exercise one of your privacy rights.

### How to Exercise your California Rights

You can exercise your rights yourself or you can alternatively designate an authorised agent to exercise these rights on your behalf. Please note that to protect your Personal Information, we will verify your identity by a method appropriate to the type of request you are making. We may also request that your authorised agent have written permission from you to make requests on your behalf, and we may also need to verify your authorised agent's identity to protect your Personal Information.

## 10. Changes to this Privacy Statement

We reserve the right to update this Privacy Policy to reflect changes to our information practices. We will provide notification of material changes to this statement by updating the "Effective" date at the top of this Privacy Statement. We encourage you to periodically review this page for the latest information on our privacy practices.

## 11. Contacting Us

Questions regarding this Privacy Statement or the information practices of the Company should be directed to:

### Mail

c/o Privacy Team  
Practifi  
Level 12, 309 Kent Street  
Sydney NSW 2000  
Australia

### Email

[privacy@practifi.com](mailto:privacy@practifi.com)