



EasyVend Platform and MiniVend Mobile App Privacy Policy

1 About this Privacy Policy

- 1.1 Thank you for your interest in Jeal Tech Pty Limited, our EasyVend Platform (including our MiniVend Mobile App). The EasyVend Platform is a supply chain management software platform through which distributors, suppliers and vendors can manage their distribution channel.
- 1.2 This Privacy Policy describes how we manage personal information about individuals that is collected and processed by us via:
- (a) our online platform at <https://www.easyvend.com.au/> and any webpages accessible from that URL or from any subdomains, and
 - (b) our apps (**Apps**) including MiniVend, available in the Android Play Store and Apple App Store; (together, the **EasyVend Platform**).
- 1.3 We are committed to complying with our privacy obligations in accordance with all applicable data protection laws, including the Australian Privacy Principles (**Australian Privacy Principles**) contained in Schedule 1 to the Privacy Act 1988 (Cth).
- 1.4 Our policy is to be open and transparent about our privacy practices. We may review our Privacy Policy periodically and reserve the right to change the Privacy Policy at any time at our discretion by posting such changes on our website. Changes will be effective immediately when posted on our website and your continued access, browsing or use of the EasyVend Platform thereafter will constitute your acceptance of the updated version. The date of the most recent version of this Privacy Policy can be found at the bottom of this webpage.

2 Consents

- 2.1 Vendors, distributors and resellers (**Vendors**) and our customers who supply goods to Vendors (**Suppliers**), and their end users, are required to comply with all applicable privacy laws.
- 2.2 We rely on our Vendors and Suppliers to obtain all relevant privacy consents and authorisations from any person required by law, in order for the personal information that is provided to us about such persons (**data subjects**) that is entered by or on behalf of our Vendors and/or Suppliers into the EasyVend Platform to be collected, disclosed and otherwise processed by us in accordance with this Privacy Policy.
- 2.3 We also rely on Vendors and Suppliers to ensure that all personal information about data subjects entered into the EasyVend Platform by or on behalf of our Vendors that is held by us is accurate, up to date, complete, relevant and not misleading.
- 2.4 We encourage our Vendors and Suppliers to ensure that data subjects are familiar with their privacy policy so that they understand how they will collect, use and otherwise process personal information about them, via the EasyVend Platform or otherwise.
- 2.5 When you provide us with the personal information of any other person, you must ensure that:
- (a) you are authorised by that person to provide their personal information to us;
 - (b) you have referred them to this Privacy Policy and any relevant Collection Notice and where required by applicable law, obtained their express consent to us collecting, using, and disclosing their personal information in accordance with this Privacy Policy; and
 - (c) you have complied with the Australian Privacy Principles in collecting the personal information.

3 The types of personal information that we collect and hold about data subjects

- 3.1 We collect and hold the following types of personal information:
- (a) **Content provided to us and/or entered into the EasyVend Platform about data subjects:** All information, including personal information, that is provided to us or entered into the EasyVend Platform (either by Vendors, Suppliers, their end users or otherwise) is stored in systems managed by us. The types of personal information collected or held by us may include names and contact details, as well as any other personal information provided to us or entered into the EasyVend Platform by, about or on behalf of, a data subject.
 - (b) **Information about end users and personnel:** We collect contact details of Vendor's end users and personnel (if any), such as names, contact information, and billing information, including credit card and other payment method details. Credit card details and other payment method details are not held by us, but are held by payment gateway providers that we use. Other than the last 4 digits of a credit card and cardholder name, all such credit card and payment method information is not accessible by us. For end users and personnel who are data subjects, we also collect the information about them referred to in paragraph (a) that is provided to us or entered into the EasyVend Platform.
 - (c) **Information required for the support, maintenance and security of the EasyVend Platform:** In order to support and maintain the EasyVend Platform and/or supply EasyVend Platform, we collect and process end user information including IP addresses, email and physical addresses, telephone numbers, user access logs, usernames, passwords, log information including information specific to your device or computer (such as system activity, hardware settings, browser type, browser language, your operating system, hardware version, device

settings, file and software names and types, mobile network information and device identifiers) and information included in technical support tickets and error messages.

4 How we collect personal information

- 4.1 Our policy is to not collect personal information by means that are unfair or unreasonably intrusive in the circumstances.
- 4.2 We collect information about prospective Vendors and Suppliers from public and private databases and when they otherwise voluntarily disclose it to us or authorise us to collect it, in order for us to market, sell and operate the EasyVend Platform.
- 4.3 When a prospective Vendor or Suppliers subscribes to the EasyVend Platform, we collect personal information about them and their data subjects (if any) in one or more of the following ways:
- when a Vendor or Supplier or their end user enters personal information into the EasyVend Platform;
 - when a Vendor or their Supplier or end user provides personal information to us (for example, as part of the onboarding process for new Vendors, Suppliers or end users);
 - when it is provided to us by third parties on behalf of a Vendor or Supplier or pursuant to an agreement with a Vendor or Supplier or an end user of the Vendor or Supplier for it to be entered into and/or processed by the EasyVend Platform;
 - when it is voluntarily disclosed to us (such as via telephone, e-mail and online forms).

5 How we use personal information

5.1 How we use personal information about data subjects is set out in the following table:

Category	How we use and process that personal information	Our reason for collecting the personal information
Personal information about prospective Vendors, Suppliers and their personnel	<ul style="list-style-type: none"> To inform, market and promote the EasyVend Platform to prospective Vendors and Suppliers and negotiate contracts for their subscriptions to the EasyVend Platform with them. 	<ul style="list-style-type: none"> Necessary for our legitimate interests (in order to operate and grow our businesses).
Personal information about actual Vendors, Suppliers and their personnel	<ul style="list-style-type: none"> To setup, configure, host or procure the hosting, of the EasyVend Platform for a Vendor or Supplier and the use of the system by the Vendor, Supplier or their end users. To provide the functionality of the EasyVend to Vendors and Suppliers. To communicate with the Vendor/Supplier and their personnel (if any) about their current and prospective use of EasyVend Platform, including with respect to their current and anticipated usage of it, and to discuss and implement product and services requirements. To provide Vendors, Suppliers and their personnel (if any) with technical support and maintenance services including by responding to help desk tickets, scheduling upgrades and enhancing the EasyVend Platform. To send out billing information and notices to Vendors and/or their personnel (if any) and process payments. To discuss our security requirements. To provide Vendors, Suppliers and/or their personnel (if any) with information about promotional offers and new products and solutions that we make available. In order to identify Vendors, Suppliers and/or their personnel (if any) when contacted with technical support questions. To administer our contractual relationships with Vendors/Suppliers 	<ul style="list-style-type: none"> Necessary for our legitimate interests (in order to operate, administer and grow our businesses including to operate the EasyVend Platform, IT systems and networks, manage our suppliers and hosting environments and ensure the successful delivery of our products and services). Performance and enforcement of contracts with our Vendors/Suppliers. Compliance with our legal obligations.

	<p>(and to enforce our contractual rights and their contractual obligations).</p> <ul style="list-style-type: none"> To investigate security incidents on the EasyVend Platform. 	
<p>Personal information about other data subjects</p>	<ul style="list-style-type: none"> As required to provide and support the functionality of the EasyVend Platform for a Vendor/Supplier and to process the personal information of data subjects on behalf of a Vendor/Supplier via the EasyVend Platform. Where we host the EasyVend Platform in the cloud or on our servers, we will collect all personal information entered into the EasyVend Platform in order for us to do so and for the EasyVend Platform to operate. Where we provide technical support, upgrades or maintenance of the EasyVend Platform in the cloud or on our servers that we host, we may need to access the database on the server that will include the personal information of other data subjects stored in the EasyVend Platform in order for us to provide such support, upgrades and maintenance services. To provide technical support services to our Vendors/Suppliers that require us to view and/or update data subject data held by us or in the EasyVend Platform. Backing up and restoring data that includes data subject personal information. To carry out security audits, investigate security incidents and implement security processes and procedures that require access to data subject personal information. 	<ul style="list-style-type: none"> Performance of our contracts with a Vendor/Supplier. Necessary for our legitimate interests (in order to administer our businesses including to allow our Vendors/Suppliers to operate the EasyVend Platform, and to enable us to operate our IT systems and networks, manage our hosting environments and ensure the successful delivery of our services). To comply with our legal and statutory obligations.

6 How we hold and secure personal information

- 6.1 We hold and store personal information that we collect in our offices, computer systems and third party owned and operated hosting facilities.
- 6.2 We take reasonable steps to protect personal information that we hold using such security safeguards as are reasonable in the circumstances to protect against loss, unauthorised access, modification and disclosure and other misuse, and we implement technical and organisational measures to ensure a level of protection appropriate to the risk of accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal information transmitted, stored or otherwise processed by us.
- 6.3 We:
- only use reputable cloud hosting providers to host personal information;
 - implement passwords and access control procedures, anti-virus, firewall and security controls for email and other applicable computer software and systems;
 - maintain files, in both hardcopy and electronic form, at our offices and other access-controlled premises;
 - operate online records managements systems on secure networks;
 - regularly perform security testing;
 - maintain physical security measures in our buildings and offices such as visitor access management, cabinet locks, surveillance systems and alarms to ensure the security of information systems (electronic or otherwise);
 - require our employees, agents and contractors to comply with the privacy and confidentiality provisions in their employment and subcontractor agreements that we enter into with them;
 - have data backup archiving and disaster recovery processes in place;
 - if appropriate in the circumstances taking into account the state of the art, the costs of implementation and the nature, scope, content and purpose of the processing, we will encrypt personal information;

- (j) conduct security awareness training for our employees and development security training for our software developers; and
- (k) with respect to personal information that we no longer require or where we are otherwise required to destroy it under applicable law, we ensure that such personal information is securely destroyed.

7 Disclosure of personal information

7.1 We will disclose personal information to our employees, officers, advisors, suppliers, agents and/or related entities who assist us in the performance of our services. We ensure that they are aware of their information security responsibilities, are appropriately trained to meet those responsibilities and have entered into agreements which require them to comply with privacy and confidentiality obligations which apply to personal information that we provide to them.

7.2 We only disclose personal information that we collect to third parties as follows:

- (a) in order to host the EasyVend Platform, we engage reputable hosting providers who host the EasyVend Platform on our behalf;
- (b) we upload personal information to third party software platforms that provide functionality and services that we use;
- (c) when performing contracts we may outsource certain obligations to third party contractors in accordance with our contractual rights (such as hosting, software development and other professional services). Professional services carried out by them may require access to data subject personal information;
- (d) when providing information to our legal, accounting or financial advisers/representatives or insurers, or to our debt collectors for debt collection purposes or when we need to obtain their advice, or where we require their representation in relation to a legal dispute;
- (e) where a person provides written consent to the disclosure of personal information about them;
- (f) where we enter into an agreement with a Supplier, we may disclose personal information about relevant Vendors, Vendor personnel and Vendor customers to them that is held or processed by the EasyVend Platform;
- (g) where it is brought to our attention that specific personal information needs to be disclosed to protect the safety or vital interests of any person;
- (h) to avoid prejudice to the maintenance of the law by any public sector agency, including the prevention, detection, investigation, prosecution, and punishment of offences;
- (i) for the enforcement of a law imposing a pecuniary penalty;
- (j) for the protection of public revenue;
- (k) for the conduct of proceedings before any court or tribunal (being proceedings that have been commenced or are reasonably in contemplation); or
- (l) where required by law.

8 Third party products and websites

8.1 The EasyVend Platform may include links to third party websites or applications and integrations with third party products and services. Our supply of those links does not mean that we endorse or recommend them. We do not warrant or represent that any third party complies with applicable data protection laws. Vendors, Suppliers and their data subjects should consider the privacy policies of any relevant third party prior to sending personal information to them.

9 Interacting with us without disclosing personal information

9.1 If a person does not provide us with their personal information, they can only have limited interaction with us. For example, a person can browse our website without providing us with personal information, such as the pages that generally describe the EasyVend Platform that we make available, and our Contact Us page. However, when a person submits a form on our website, or an organisation enters into a contract with us, or a person registers an end user account with us, we need to collect personal information for identification purposes, so that we can operate the EasyVend Platform, and for the other purposes described in this Privacy Policy.

9.2 Any person has the option of not identifying themselves or using a pseudonym when contacting us to make general enquiries about the EasyVend Platform but not if they wish to actually use the EasyVend Platform or any part thereof. It is not practical for us to provide a person with access and/or use of EasyVend Platform or any part thereof if they refuse to provide us with personal information.

10 Offshore disclosure

10.1 We may transfer personal information to our contractors and service providers who assist us with the supply and provision of the EasyVend Platform, and to assist us with the operation of our business generally, where we consider it necessary for them to provide that assistance. We will take reasonable steps to ensure that such recipients do not breach the Australian Privacy Principles in relation to personal information or other relevant State and Territory laws (as applicable). At present we transfer your personal information to our interstate contractors and service providers within Australia. We may employ offshore personnel to support you and your team on our products and services.

11 How to access and correct personal information held by us

11.1 Vendors, Suppliers their personnel and other data subjects who wish to access and correct the personal information held by us about them should contact us.

- 11.2 Prior to contacting us or submitting a request for access to correct any personal information held about them, Vendors and their personnel can update the personal information about them by logging into their account on the EasyVend Platform, where such functionality is available. However, we encourage you to contact us in any event and we would be happy to assist you.
- 11.3 All other data subjects who wish to access and correct the personal information held by us about them should contact us.
- 11.4 It is our policy to retain personal information in a form which permits identification of any person only as long as is necessary for the purposes for which the personal information was collected; and for any other related, directly related or compatible purposes if and where permitted by applicable law. We will only process personal information that you provide to us for the minimum length of time permitted by applicable law and only thereafter for the purposes of deleting or returning that personal information to you (except where we also need to retain the information in order to comply with our legal obligations, or to retain the information to protect your or any other person's vital interests).
- 11.5 In addition to clause 11.4, we retain personal information in connection with the EasyVend Platform as follows:
- (a) Personal information about Vendors, their personnel and other data subjects will be held while the applicable Vendor has a registered account with us and thereafter for a period of 5 years for tax purposes; and
 - (b) We will only keep personal information for longer periods than specified above, where required under applicable law.
- 11.6 As an alternative to deleting personal information, we may elect to de-identify it where permissible by law. We will de-identify certain types of personal information for the purpose of improving the EasyVend Platform and for provision to third parties for marketing and research purposes.
- 11.7 Where you require personal information to be returned, it will be returned to you at that time, and we will thereafter delete all then remaining existing copies of that personal information in our possession or control as soon as reasonably practicable thereafter, unless applicable law requires us to retain the personal information, in which case we will notify you of that requirement and only use such retained data for the purposes of complying with those applicable laws.
- 11.8 We will handle all requests for access to personal information in accordance with our statutory obligations. You can request to receive a copy of your personal information by emailing support@jeal.com.au. We may require payment of a reasonable fee by any person who requires access to their personal information that we hold, except where such a fee would be contrary to applicable law. We will not charge you for the making of any such request. We will endeavour to provide a response to any request for access to personal information within 72 hours from the time a request is made.
- 12 Our contact details**
- 12.1 Any person who wishes to contact us for any reason regarding our privacy practices or the personal information that we hold about them, or make a privacy complaint, may contact us as follows:
- Contact: EasyVend support
Email: support@jeal.com.au
Post: PO BOX 1013, St Marys NSW 1790, Australia
Telephone: + 61 2 9623 6403
- 12.2 We endeavour to resolve any privacy complaint with the complainant within a reasonable time frame given the circumstances. This may include working with the complainant on a collaborative basis or otherwise resolving the complaint.
- 12.3 If the complainant is not satisfied with the outcome of a complaint or they wish to make a complaint about a breach of the Australian Privacy Principles, they may refer the complaint to the Office of the Australian Information Commissioner who can be contacted using the following details:
- Telephone: 1300 363 992
Email: enquiries@oaic.gov.au
Address: GPO Box 5218, Sydney NSW 2001, Australia

This Privacy Policy was most recently updated on 10th March 2023.