

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 and our EasyVend Platform (including our MiniVend Mobile App). The EasyVend Platform is a B2B eCommerce and sales order management 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), as amended by the **Privacy and Other Legislation Amendment Act 2024 (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.

2 Consents

- 2.1 **Vendors**, distributors and resellers 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) to be collected, disclosed and otherwise processed by us in accordance with this Privacy Policy.
- 2.3 **Consent standards:** Consent must be freely given, specific, informed and unambiguous. We do not rely on pre-ticked boxes, bundled consent or vague language as a valid form of consent. Where consent is the basis for processing, individuals may withdraw consent at any time without detriment by contacting us using the details in Section 12.
- 2.4 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.
- 2.5 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.
- 2.6 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, stored in systems managed by us including names, contact details, and 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:** Contact details such as names, contact information, and billing information, including credit card and other payment method details. Credit card details are held by payment gateway providers, not by us.
 - (c) **Information required for the support, maintenance and security of the EasyVend Platform:** IP addresses, email and physical addresses, telephone numbers, user access logs, usernames, passwords, log information including device-specific information (system activity, hardware settings, browser type, operating system, 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.
- 4.3 When a prospective Vendor or Supplier subscribes to the EasyVend Platform, we collect personal information in one or more of the following ways:
- (a) when a Vendor or Supplier or their end user enters personal information into the EasyVend Platform;
 - (b) when a Vendor or their Supplier or end user provides personal information to us (for example, as part of the onboarding process);
 - (c) when it is provided to us by third parties on behalf of a Vendor or Supplier or pursuant to an agreement; or
 - (d) 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. 	<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. • To provide the functionality of EasyVend to Vendors and Suppliers. • To communicate about current and prospective use of the EasyVend Platform. • To provide technical support and maintenance services. 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (to operate, administer and grow our businesses). • Performance and enforcement of contracts with our Vendors/Suppliers. • Compliance with our legal obligations.

<p>Personal information about other data subjects</p>	<ul style="list-style-type: none"> • To send out billing information and process payments. • To discuss our security requirements. • To provide information about promotional offers and new products. • To administer our contractual relationships. • To investigate security incidents. • As required to provide and support the functionality of the EasyVend Platform for a Vendor/Supplier. • To provide technical support services that require us to view and/or update data subject data. • Backing up and restoring data that includes data subject personal information. • To carry out security audits, investigate security incidents and implement security processes. 	<ul style="list-style-type: none"> • Performance of our contracts with a Vendor/Supplier. • Necessary for our legitimate interests. • To comply with our legal and statutory obligations.
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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.
- 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;
 - maintain files, in both hardcopy and electronic form, at our offices and other access-controlled premises;
 - operate online records management systems on secure networks;
 - regularly perform security testing;
 - maintain physical security measures including visitor access management, cabinet locks, surveillance systems and alarms;
 - require our employees, agents and contractors to comply with the privacy and confidentiality provisions in their employment and subcontractor agreements;
 - have data backup archiving and disaster recovery processes in place;
 - where appropriate, encrypt personal information;
 - conduct security awareness training for our employees and development security training for our software developers; and
 - ensure that personal information that we no longer require 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 and have entered into agreements which require them to comply with privacy and confidentiality obligations.
- 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. 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;
 - (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;
 - (g) where 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; 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. 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 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.

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. 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, correct and delete personal information held by us

- 11.1** Vendors, Suppliers, their personnel and other data subjects who wish to access, correct or request deletion of the personal information held by us about them should contact us using the details set out in Section 12.
- 11.2** Prior to contacting us, 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, correct or request deletion of the personal information held by us about them should contact us.
- 11.4** **Right to erasure (deletion):** You have the right to request that we delete your personal information where: (a) the personal information is no longer necessary for the purposes for which it was collected; (b) you withdraw consent on which processing is based and there is no other lawful basis for the processing; (c) the personal information has been unlawfully processed; or (d) the personal information must be deleted to comply with a legal obligation. We will respond to any deletion request within 30 days and notify you of the outcome.
- 11.5** 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.
- 11.6** In addition to clause 11.5, 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.
- 11.7** As an alternative to deleting personal information, we may elect to de-identify it where permissible by law.
- 11.8** 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.
- 11.9** 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@jealtech.com.au. 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 **30 days** from the time a request is made.

11A Notifiable data breaches

- 11A.1** In the event of a data breach that is likely to result in serious harm to any affected individual, we will comply with our obligations under the **Notifiable Data Breaches (NDB) scheme** under Part IIIIC of the Privacy Act 1988 (Cth), as updated by POLA 2024, including:
- (a) **Assessment:** Upon becoming aware of a potential eligible data breach, we will undertake a rapid assessment to determine whether the breach is likely to result in serious harm.
 - (b) **Notification to the OAIC:** Where an eligible data breach is identified, we will notify the Office of the Australian Information Commissioner (OAIC) as soon as practicable and within 72 hours of forming the view that an eligible data breach has occurred.
 - (c) **Notification to affected individuals:** We will notify affected individuals as soon as practicable after notifying the OAIC, providing information about the nature of the breach, the types of information involved, and the steps individuals should take to protect themselves.
 - (d) **Remediation:** We will take immediate steps to contain the breach, assess its scope and severity, and implement measures to prevent recurrence.
- 11A.2** We maintain a data breach response plan and conduct periodic testing and reviews of our incident response capability.

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@jealtech.com.au
Post: PO BOX 1013, St Marys NSW 1790, Australia
Telephone: + 61 2 9188 4470
- 12.2** We endeavour to resolve any privacy complaint with the complainant within a reasonable time frame given the circumstances.
- 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:
- 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 January 2026.