

**SAFETY TRACKER PTY LTD ABN 65 169 314 363 t/a DIGI CLIP MOBILE
FORMS**

PRIVACY POLICY

Version 1.4 | Last Updated: May 2026

Document Change Log

Version	Date	Summary of Changes
V1.1	March 2017	Initial release
V1.2	March 2019	Version 1.2 release
V1.3	20 July 2024	Version 1.3 release
V1.4	May 2026	Added cookie consent categories (s.7); updated data retention schedule to accurately reflect DIGI CLIP practices (s.9); updated children's privacy age threshold to 16 (s.13); added sub-processors disclosure (s.4); added automated processing clause (s.16); added Site and App definitions (s.1); added business data to collection list (s.2); added cloud storage reference (s.6); added OAIC and breach timeframe (s.10); added email notification for material policy changes (s.14); minor clarifications throughout.

This Privacy Policy sets out our commitment to protecting the privacy of your personal information that we collect through this website www.digiclip.io (Site), www.safetytracker.net.au (Site), the smart device application (App), or directly from you.

Please read this Privacy Policy carefully. If you have any questions, please contact us using the contact details provided at the end of this document.

Providing us with personal information indicates that you have had sufficient opportunity to access this Privacy Policy and that you have read and accept it. If you do not wish to provide personal information to us, you do not have to do so; however, it may affect your use of this Site or App or any products and services offered on it.

1. Definitions

Personal Information: Any information that can identify an individual.

Sensitive Information: A subset of personal information that includes information about an individual's racial or ethnic origin, political opinions, religious beliefs, health information, etc.

Site: Refers to our websites available at www.digiclip.io and www.safetytracker.net.au.

App: Refers to the DIGI CLIP mobile application available for download on smart devices.

2. Collection of Personal Information

We may collect personal information from you in various ways, including:

- Directly from you, when you provide it to us (e.g., by email, through our Site, or in person).
- Through your use of our Site and App, including through cookies and similar tracking technologies.

The types of personal information we may collect include:

- Name.
- Contact details including email address, address, and telephone number.
- Demographic information such as postcode.
- Business details including company name, ABN, and industry.
- Any other information requested on this Site or App or otherwise requested by us or provided by you.

3. Use of Personal Information

We may collect, hold, use, and disclose personal information for purposes including:

- To contact and communicate with you.
- For internal record keeping.
- For market research and business development, including website development.
- For marketing, including direct marketing.
- To offer additional benefits of the application to you.
- For any other purpose permitted by law.

4. Disclosure of Personal Information

We may disclose personal information:

- For the purpose of providing information, products, services, or marketing to customers.
- To credit reporting agencies and courts, tribunals, and regulatory authorities where customers fail to pay for goods or services provided by us to them.
- To courts, tribunals, regulatory authorities, and law enforcement officers as required by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise, or defend our legal rights.
- To third parties, including agents or sub-contractors, who assist us in providing information, products, services, or direct marketing to you. This may include parties located, or that store data, outside of Australia.

Where we disclose your personal information to third parties for these purposes, we will take reasonable steps to ensure that the third party handles your personal information in a manner consistent with this Privacy Policy.

Our key third-party service providers (sub-processors) currently include, but are not limited to: Stripe Payments Australia Pty Ltd (payment processing), Microsoft Azure (primary cloud hosting and data storage), and third-party providers for backup and data storage purposes, and a CRM platform (used to manage customer data received from DIGI CLIP for marketing and critical communications purposes). This list may be updated from time to time. You may contact us to request an up-to-date list of sub-processors.

If there is a change of control of our business or a sale or transfer of business assets, we reserve the right to transfer to the extent permissible at law our user databases, together with any personal information and non-personal information contained in those databases. This information may be disclosed to a potential purchaser. We would seek to only disclose information in good faith and where we have sought to maintain confidentiality.

5. Your Rights and Controlling Your Personal Information

Choice and Consent: Providing us with your personal information is optional to you. You can choose not to provide personal information. When you provide us with your personal information, you consent to the terms in this Privacy Policy and to us disclosing or receiving your personal information for these purposes.

Restrict: You may choose to restrict the collection or use of your personal information. If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by contacting us at the email address listed in this Privacy Policy.

Access: You may request details of personal information that we hold about you, in certain circumstances set out in the Privacy Act 1988 (Cth). An administrative fee may be payable for the provision of information. We may refuse to provide you with information that we hold about you, in certain circumstances set out in the Privacy Act.

Correction: If you believe that any information we hold on you is inaccurate, out of date, incomplete, irrelevant, or misleading, please contact us by email. We rely in part upon customers advising us when their personal information changes. We will respond to any request within a reasonable time. We will endeavour to promptly correct any information found to be inaccurate, incomplete, or out of date.

Complaints: If you believe that we have breached the Australian Privacy Principles and wish to make a complaint about that breach, please contact us by email setting out details of the breach. We will promptly investigate your complaint and respond to you in writing, setting out the outcome of our investigation, what steps we propose to take to remedy the breach, and any other action we will take to deal with your complaint.

Unsubscribe: To unsubscribe from our e-mail database, or opt-out of communications, please contact us at enquiries@digiclip.io or use the unsubscribe link in any marketing email.

6. Storage and Security

We are committed to ensuring that the information you provide is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic, and managerial procedures to safeguard and secure the information and protect it from misuse, interference, loss, and unauthorised access, modification, and disclosure.

Your data is stored on secure cloud-based infrastructure, primarily hosted on Microsoft Azure, with additional third-party providers used for backup and data storage purposes. We take reasonable steps to ensure these providers maintain appropriate security standards consistent with this Privacy Policy.

No information transmitted over the Internet can be guaranteed to be secure. We cannot guarantee the security of any information that you transmit to us or receive from us. The transmission and exchange of information is carried out at your own risk. Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that personal information that we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

7. Cookies & Web Beacons

We may use cookies on this Site from time to time. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your e-mail address or other personally identifiable information. However, once you choose to furnish the Site with personally identifiable information, this information may be linked to the data stored in the cookie.

We may use web beacons on this Site from time to time. Web beacons or clear gifs are small pieces of code placed on a web page to monitor the behaviour and collect data about the visitors viewing a web page. For example, web beacons can be used to count the users who visit a web page or to deliver a cookie to the browser of a visitor viewing that page.

We use the following categories of cookies:

- **Essential cookies:** Required for the Site and App to function correctly. These cannot be disabled.
- **Analytics cookies:** Used to understand how visitors interact with our Site (e.g., Google Analytics). This helps us improve our content and user experience.
- **Marketing/tracking cookies:** Used to deliver relevant advertising and track the effectiveness of our marketing campaigns (e.g., CRM tracking pixels and remarketing tools). These are only set where you have provided consent.

Where required by law, we will seek your consent before placing non-essential cookies on your device. You can manage your cookie preferences at any time through our cookie consent tool or through your browser settings.

You may choose to disable cookies through your browser settings; however, this may affect your ability to use some features of the Site.

8. Links to Other Websites

Our Site or App may contain links to other websites of interest. We do not have any control over those websites. We are not responsible for or liable for the protection and privacy of any information which you provide whilst visiting such websites, and such websites are not governed by this Privacy Policy. We recommend you exercise caution and review the privacy policies of any third-party sites you visit.

9. Data Retention

We retain different categories of information as follows:

DIGI CLIP / Safety Tracker platform data (checklists, inspections and other form data, incident reports, hazard reports, quality reports, and user information):

- This data is retained for the duration of your active subscription only.
- When a subscription is cancelled or deleted, all associated platform data is permanently deleted. We do not retain platform data after account deletion.
- It is your responsibility to export any data you wish to retain prior to cancelling your subscription.

Accounting and billing information:

- Financial and billing records relating to your account (including invoices and payment history) are retained in our accounting system in accordance with Australian taxation and legal record-keeping obligations (generally 7 years).

Account holder information:

- Your contact details and account holder information (such as name, email address, and business details) may be retained after subscription cancellation for marketing, follow-up, and internal business record-keeping purposes.
- You may request removal of your contact information from our marketing communications at any time by contacting us at enquiries@digiclip.io or by using the unsubscribe link in any marketing email.

If you have specific requirements regarding the deletion or retention of your information, please contact us in writing before cancelling your subscription.

10. Data Breach Notification

In the event of a data breach that is likely to result in serious harm to you, we will promptly investigate the breach and notify you and the relevant regulatory authorities as required by law. We will notify affected individuals and the Office of the Australian Information Commissioner (OAIC) as soon as practicable, and generally within 30 days of becoming aware of an eligible data breach. Our notification will include the nature of the breach, the affected data, and our response actions.

11. International Data Transfers

If we transfer your personal information outside of Australia, we will ensure that the recipient country has adequate data protection laws or that we have implemented appropriate safeguards to protect your personal information in accordance with this Privacy Policy and applicable laws. This may include the storage of data on servers located outside Australia as part of our cloud hosting arrangements with the providers identified in Section 4.

12. User Rights

Access: You have the right to request access to the personal information we hold about you. We may charge an administrative fee for providing this information.

Correction: You have the right to request that we correct any personal information that you believe is inaccurate, incomplete, or out of date.

Erasure: You have the right to request that we delete your personal information, subject to certain exceptions.

Data Portability: You have the right to request a copy of your personal information in a structured, commonly used, and machine-readable format.

Object: You have the right to object to the processing of your personal information in certain circumstances.

Withdraw Consent: Where consent is the basis for our data processing, you have the right to withdraw your consent at any time.

13. Children's Privacy

Our Site and App are not intended for use by individuals under the age of 16. We do not knowingly collect personal information from persons under 16. If we become aware that we have inadvertently collected personal information from a person under 16, we will delete such information from our records. If you are a parent or guardian and believe we have collected information about a child in your care, please contact us immediately at enquiries@digiclip.io.

14. Changes to this Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, legal requirements, or other factors. We will provide notice of any significant changes by posting the new Privacy Policy on our Site and App. Where changes are material, we will endeavour to notify you by email using the contact details held in your account. You are encouraged to review this Privacy Policy periodically to stay informed about how we are protecting your personal information.

15. Governing Law

This Privacy Policy is governed by the laws of South Australia. Any disputes arising out of or in connection with this Privacy Policy will be subject to the jurisdiction of the courts of South Australia.

16. Automated Processing and Analytics

We may use automated tools, analytics platforms, and software features that process your data without direct human involvement. This includes usage analytics to understand how our platform is used, automated email communications triggered by your actions within the App or Site (such as onboarding emails, subscription reminders, form submission notifications, fault or defect alerts, corrective action notifications, and support follow-ups), and aggregated, de-identified reporting for product improvement purposes.

We do not currently make decisions that significantly affect you using solely automated processing. If this changes, we will update this Privacy Policy and notify you accordingly.

Contact Us

If you have any questions or notices in relation to this Privacy Policy, please contact us:

- By email: enquiries@digiclip.io

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