



Outback Imaging Privacy Policy

Version 1.5 - Last updated: 14th June 2023



Our Privacy Commitment

Outback Imaging ("OI," "we," or "us") is dedicated to safeguarding the confidentiality of the information we gather.

We recognise that your privacy is of utmost importance, and we share the same commitment.

Our Privacy Policy outlines our information management practices, including the types of information we collect, the purposes for which we collect it, and how we handle, utilise, and disclose it. By using our products and services (including our website) or by providing your information to us, you agree to the terms set forth in this Privacy Policy.

Please note that our website may feature links to other websites. We cannot be held accountable for the privacy practices or content of those external websites. The privacy practices applicable to those websites may significantly differ from ours, hence we recommend reviewing the privacy policy of such websites before using them.

You are responsible for any data transfers (including personal information) to third-party applications that you initiate through our services. We have no control over, and assume no responsibility for, the privacy practices or content of these applications.

Changes to this Privacy Policy

From time to time, we may need to revise this Privacy Policy to ensure compliance with new laws and regulations. The most recent edition of this Privacy Policy will consistently be accessible on our website (www.ezescan.com). The revised version will take effect starting from the date indicated at the beginning of the Privacy Policy. We recommend that you periodically visit our website to stay informed about our current Privacy Policy.

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making digital work

Privacy Policy Contact

The Outback Imaging entity responsible for your personal information (as defined by the General

Data Protection Regulation 2016/679 ("GDPR") and other relevant laws globally) is determined

based on the jurisdiction where your personal information is collected. For more information about

your data controller, kindly inquire with your EzeScan business contact or reach out to us using the

contact details provided below.

In the event that no Outback Imaging entity exists in the jurisdiction where your personal

information is collected, Outback Imaging Pty Ltd, located at Unit 1, 39 Dunhill Crescent,

Morningside QLD 4170 Australia, assumes the role of the data controller responsible for your

personal information. If you have any queries regarding this Policy or the collection, usage, or

processing of your personal information by Outback Imaging, please contact us through any of the

following methods of communication:

Privacy Officer - Australia:

Address: Outback Imaging Pty Ltd, PO Box 342, Morningside, QLD, 4170, Australia

Phone: +61 417 240 128

Email: PrivacyOfficer@ezescan.com.au

Privacy Officer - United Kingdom:

Outback Imaging UK Limited, 10 John Street, London WC1N 2EB

Phone: +44 (0) 20 3535 0645

Email: PrivacyOfficer@ezescan.co.uk

Privacy Officer - United States of America:

Outback Imaging USA LLC, 13577 Feather Sound Drive, Suite 400, Clearwater Florida 33762

Phone: +1 (323) 443-0022

Email: PrivacyOfficer@ezescan.com



1. What type of personal information do we collect?

When using our products and services (including our website), we will collect information about you and about your use of our products and services, such as which services you use and how you use them.

Information you provide to us:

We collect various types of information that you provide to us, including but not limited to:

- Audit data: This includes details such as the time and location of your login, the systems you
 accessed, and the duration of your access.
- Candidate data: Information pertaining to your employment history, qualifications, educational records, references, and any other details you provide when applying for a job with us.
- **Competition data**: Contact and other information submitted during your participation in our prize draws or competitions.
- **Contact data**: Your name, employer, job title, department, username, postal address, and telephone numbers.
- Contract data: Specifics of products purchased from us and services provided to your organisation.
- Correspondence data: Records of our communications with you, including telephone calls, emails, SMS messages, online and in-person conversations.
- Credentials: Passwords, password hints, or similar security information used for authentication and account access.
- Event data: Your contact information and a record of your participation in an event.
- Financial data: Invoice details, bank account information, and other payment card particulars.
- Marketing data: Your preferences regarding marketing communications from us and information about your usage of our products or services.
- Relationship data: Information concerning suppliers and business partners.
- **Survey data**: Contact and other information provided when completing our surveys.
- Other data: Additional information shared with us during the course of our business interactions.



We will take all reasonable precautions to ensure the personal information collected remains accurate and correct. You can choose not to provide your personal information to us, however it may restrict our ability to deliver the requested services to you.

Information collected automatically:

When accessing or using our services, we may automatically collect certain information, including but not limited to:

- **Device data**: Details about your computer and visits to our services, such as your IP address, approximate geographical location, browser type and version, operating system, and referral source. We may also collect the telephone number from which you contact us.
- Log data: Information associated with your activities on our services, including your interactions, page views, traffic statistics, bytes transferred, hyperlinks clicked, and other actions taken.
- Website data: As with most websites and other digital services, we employ cookies. We may also collect information about you and your use of our website, products and services using cookies. We may use cookies to monitor and observe your use of our website, products and services, compile aggregate data about that use, and provide you with a more effective service (which may include customising parts of our website based on your preferences and past activities on that website). We use session based or temporary cookies that are stored and used during your browsing session, use of our website and use of our services. These cookies are usually deleted automatically from your device when you log out of your account, the browser is closed or within a reasonable time after your use of our website. Permanent, persistent or stored cookies are stored on your device in between your use of our website which allows your preferences or actions to be remembered. When using our website, we also allow the use of some third party cookies which are set by a domain other than our website (for example, Google may set a cookie on your browser). Modern internet browsers have a facility that will allow you to disable cookies altogether and you can refer to your browser's help menu to find out how to do this. While you will still be able to browse our website with cookies disabled on your internet browser, some website functionality may not be available or may not function correctly, and our ability to deliver our service to you may be limited. It also may degrade the user experience.



Information we collect from other sources.

While using our SaaS services, you may upload documents containing personal information, including sensitive data about third parties. These documents may include confidential company information or personal details of individuals. Outback Imaging does not access or view the content of these documents unless instructed by the respective customer or where required as part of our Services, such as to provide maintenance services or troubleshooting. In such cases, we process any personal information contained within the documents strictly as a "service provider" or "data processor" in accordance with applicable laws, following our customers' instructions.

For SaaS customers using EzeScan Cloud, you have direct control over access to the data or information stored within these environments. It is your responsibility to obtain consent from individuals before collecting, storing, using, processing, modifying, or disclosing their personal information through any EzeScan environment. We urge you to familiarise yourself with the available controls that enhance the security and privacy of our services provided to you.

2. The legal grounds for the usage of personal data

Where we intend to use your personal data, we rely on the following legal grounds:

Performance of a contract: We may need to collect and use your data to establish or fulfill a
contract between you and us. This includes instances such as placing an order for software
or services, signing a software licensing agreement or annual software maintenance
agreement, and responding to your requests and providing services according to our terms
and conditions or other applicable business terms agreed upon with you or your employing
organisation.



- Legitimate interests: We may use your data when it aligns with our legitimate interests, provided that it is not detrimental to you, falls within your reasonable expectations, and is necessary for our own or a third party's legitimate purpose. This includes:
 - o For our own direct marketing or continued communication.
 - Fraud prevention.
 - o Internal administrative purposes.
 - o Personalisation of the service(s) we provide to you.
 - Ensuring network and information security, including protection against unauthorized access to electronic communication networks and prevention of damage to computer and electronic communication systems.
 - Reporting potential criminal acts or threats to public security to the relevant authorities.
- Compliance with a legal obligation: We may be required to process your information due to
 legal requirements, including employment laws, tax laws and other regulatory provisions
 applicable to us as a provider of document batch scanning and data capture and workflow
 software solution services.
- Consent: In certain cases, we may request your consent for specific services we offer. For example, this may apply to the processing of your data for marketing purposes if you or your employing organisation is not our client, or for handling sensitive categories of data like health or racial background, where obtaining your consent is legally required due to the sensitive nature of the information and the circumstances surrounding its collection or transfer. If we rely on your consent, you have the right to withdraw it at any time by contacting us using the contact information provided above. However, please note that withdrawing consent may impact our ability to provide products or services that rely on having your consent.



3. How is your personal information utilised?

We process your personal information solely for the purposes outlined in this Policy, and we do so only when we have a valid legal basis under applicable data protection laws. The legal basis depends on the specific purpose for which we process your personal information and the relevant data protection laws that govern Outback Imaging's activities in your jurisdiction.

We will use your personal information for the following purposes as is necessary for the performance of our obligations under our customer terms, or to answer questions or take steps at your request prior to entering those terms:

- Creating and maintaining your account(s) in our systems.
- Enabling you to utilise our services.
- Verifying your identity when interacting with us.
- Determining your eligibility for any of our products or services.
- Maintaining our relationship with you.
- Providing products and services to you or your organisation.
- Answering your queries and requests.
- Complying with legal and regulatory obligations.
- Conducting market analysis and research.
- Monitoring the use of our products and services, including our website.
- Assessing, operating, maintaining, upgrading, and improving our products and services, including our website.
- Enhancing our products, services, and information for our customers and the community.
- Conducting education and training programs for our employees.
- Managing and resolving legal or commercial complaints or issues, including debt recovery.
- Fulfilling our obligations and carrying out our functions under applicable laws and agreements.
- Maintaining and updating our records.
- Using your personal information as per your requests or instructions.
- Conducting planning and forecasting activities and other internal business processes.
- Keeping you informed about our activities.
- Notifying you of changes to our products or services.



- Making special offers related to our products or services that we believe may interest you.
- Using your personal information for any other purpose authorised by you.
- Using your personal information as required or authorised by law.

We may use your personal information for our own marketing purposes, but we will not sell your information to any third party. We may contact you via email, SMS, or other means to inform you about products and services we believe may be of interest to you.

You have the option to opt-out of receiving marketing communications from us at any time by using the 'unsubscribe' link provided in the communication or by contacting us using the contact details below. Please note that unsubscribing from promotional communications will not stop service-related communications, such as administrative alerts related to your account.

We may de-identify your information to remove any identifiers that could be used to identify you. De-identified information may be used and disclosed in the course of our business, including in promotional or marketing material.

4. Who do we disclose your personal information to?

There are circumstances where we may need to disclose or share your personal information with third parties. Such disclosures will be made in compliance with applicable law and for the purposes outlined in this Policy.

In accordance with applicable law, we may share your personal information with the following third parties for the purposes listed below:

- Your authorised representatives, advisers, and other individuals you have given permission to interact with us on your behalf.
- Related entities within our corporate group.
- Our employees, business partners, consultants, contractors, suppliers, service providers, professional advisers, and agents who require the information to assist us in conducting our business activities.



- Our payment system operators and financial institutions.
- Prospective purchasers of all or part of our business or shares in our company or a related entity.
- Government agencies, authorities, regulators, law enforcement agencies, and other parties authorised or required by law to whom we are obligated to disclose your personal information.
- Parties identified at the time of collecting your personal information or as otherwise authorised by you.

We may disclose personal information to public authorities and other third parties in order to comply with the law, applicable regulations, governmental and quasi-governmental requests, court orders or subpoenas, to enforce other agreements you may have with Outback Imaging, to protect our rights, property or safety or the rights, property or safety of our users or others (e.g., to a reporting agency for fraud protection) or as otherwise permitted by applicable law. Unless prohibited by applicable law, we reserve the right to disclose collected information to law enforcement or other government officials when we deem it necessary or appropriate at our sole discretion.

We require all third parties to respect the security of your personal information and handle it in accordance with the law. We do not permit our third-party service providers to use your personal information for their own purposes, and we only allow them to process your personal information for specific purposes and in accordance with our instructions.

5. Cross-border transfers of personal information

Our SaaS services are hosted and operated in Australia, the United Kingdom and the United States.

We may disclose information with recipients located outside of your country of residence, including our support personnel, contractors, and external service providers.

We take commercially reasonable steps to ensure that any overseas recipient adheres to the privacy laws applicable in your jurisdiction and complies with this Privacy Policy regarding the information.



By using our products or services (including our website) and providing us with your information, you consent to our disclosure, storage, and use of your information in the countries mentioned above, even if they have different privacy or data protection regulations compared to the country where you reside.

6. How do we maintain and secure your personal information?

We take reasonable steps to ensure that any of your personal information which we hold is accurate, complete and up-to-date. This includes promptly updating your information upon notification of any changes, regularly reviewing our contact lists for accuracy, and providing individuals with easy ways to update their information.

Typically, we store the personal information we collect in electronic databases, some of which may be managed by third-party data storage providers on our behalf. Additionally, we may maintain physical records of this information in secure storage facilities. We employ various physical and technical security measures to safeguard the confidentiality and integrity of the information we hold. These measures include:

- Restricting access to our physical and electronic databases, along with implementing security procedures for entry into our business premises.
- Utilising technological security measures such as password protection, network firewalls,
 encryption, intrusion detection, and site monitoring whenever feasible.

We also monitor access to and modifications of your information by our employees and contractors, ensuring they are well-informed and properly trained in their responsibilities for safeguarding your privacy.

Nevertheless, it's important to note that the internet is not entirely secure, and despite our implementation of physical and technical security protocols, we cannot guarantee the absolute security of your information. You also have a crucial role in maintaining the security of your information by maintaining the confidentiality of your usernames and passwords used for our products and services (including our website).



7. How long do we store your information?

We retain personal information only for the duration necessary to fulfill the purpose for which it was collected or as mandated by law. Upon the conclusion of this period, we will make reasonable efforts to de-identify or securely dispose of the information in our possession or under our control within a reasonable timeframe.

8. How can you access, restrict use, correct and transfer your personal information?

You have the following rights regarding your personal information:

- Request a copy of your personal information.
- Ask us to limit the use of your personal information.
- Correct or update any personal information that is outdated, incorrect, incomplete, or misleading.

To exercise these rights, please submit a written request using the contact details provided below. We may require you to verify your identity before providing or correcting the requested information.

We will action your request within a reasonable time frame and provide one copy of your information free of charge. If your request involves additional copies or is deemed manifestly unfounded, excessive, or repetitive, we reserve the right to refuse the request or charge a reasonable fee. If we decline your request or impose a fee, we will provide you with an explanation within a reasonable timeframe.

You have the right to request a copy of the information you have provided to us in a structured, commonly used, and machine-readable format. You also have the right to have that information transmitted or ported to another entity under specific circumstances.



There may be instances where we are unable to fulfill your information request, such as when it would infringe upon the privacy, rights, or freedoms of others or result in a breach of confidentiality or applicable laws. In such cases, we will inform you of the reasons for our inability to comply with your request.

9. How can you erase your personal information?

You have the right to request the deletion or destruction of your personal information in the following circumstances:

- When it is no longer necessary for the original purpose of collection.
- When it is not being used for its intended purposes.
- When you withdraw your consent for certain processing activities.

Please note that there may be situations where we are unable to fulfil your request due to legal obligations requiring us to continue processing your personal information. To submit a request for erasure, please provide a written request using the contact details provided below. We may ask you to verify your identity before proceeding with your request.

10. How can you make a complaint?

If you have any concerns regarding your privacy or how we have handled your information, or if you have questions about the collection of your information, please reach out to our Chief Privacy

Officer using the provided contact details below.

Should you wish to file a complaint regarding the manner in which we have handled your information, including any potential breaches of privacy regulations, please submit a written complaint to our Chief Privacy Officer using the contact details provided below. Kindly include your contact details (such as name, address, email address, and telephone number) and provide a clear description of the complaint.

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We will promptly address your query or complaint within a reasonable timeframe. If you find our response unsatisfactory, you may contact us to discuss your concerns further. Additionally, you have the right to contact the relevant privacy or data protection regulatory authority in your jurisdiction:

- **Australia:** the Office of the Australian Information Commissioner (OAIC) using the contact details at the OAIC's website (https://www.oaic.gov.au/)
- **Canada:** you have the right to lodge a complaint with the privacy authority responsible for the privacy law in effect in your province of residence.
- **European Union:** you have the right to lodge a complaint with the Supervisory Authority of the EU Member State in which you live or work, or where the alleged infringement took place.
- New Zealand: you have a right to make a compliant to the Office of the Privacy
 Commissioner (New Zealand) at www.privacy.org.nz.
- **United Kingdom:** the Information Commissioner's Office (ICO) using the contact details at the ICO's website (https://ico.org.uk/).