

# PRIVACY POLICY

## 1 INTRODUCTION

This document sets out the privacy policy of TAKECAREOS PTY LTD (referred to in this privacy policy as **we**, **us**, or **our**).

We provide a cloud-based software platform used by NDIS providers, aged care providers, support coordination businesses and other care-based organisations in Australia to manage their operations, including rostering, payroll, billing, care documentation, compliance, messaging and related administrative functions.

Our customers are generally care organisations and similar businesses. Those organisations may invite their staff, contractors, administrators and other authorised users to access and use our platform. Information relating to participants, residents, clients and other individuals receiving care or support may be entered into the platform by those organisations and their personnel.

We take our privacy obligations seriously and have created this privacy policy to explain how we collect, hold, use and disclose personal information.

By providing personal information to us, or by accessing or using our website, platform or services, you acknowledge that your personal information will be handled in accordance with this privacy policy.

We may change this privacy policy from time to time by posting an updated copy on our website or platform and we encourage you to check it regularly to ensure that you are aware of our most current privacy policy.

## 2 TYPES OF PERSONAL INFORMATION WE COLLECT

The personal information we collect, hold or otherwise handle may include the following:

- (a) name;
- (b) mailing or street address;
- (c) email address;
- (d) social media information;
- (e) telephone number and other contact details;
- (f) age;
- (g) date of birth;
- (h) credit card or other payment information;
- (i) rostering, scheduling, timesheet and payroll-related information;
- (j) care and service delivery records, case notes, forms, policies, documents and other files uploaded to our platform;
- (k) GPS and location information collected when users clock in, clock out, log travel or use other location-enabled platform features;
- (l) sensitive information, including health information, disability information and government identifiers such as NDIS participant numbers;
- (m) information about your business or personal circumstances;
- (n) information in connection with client surveys, questionnaires and promotions;
- (o) your device identity and type, I.P. address, geo-location information, page view statistics, usage data and standard web log information;
- (p) information about third parties; and
- (q) any other information provided by you to us via our website or our online presence, or otherwise required by us or provided by you.

### **3 PERSONAL INFORMATION OF MINORS**

We do not collect personal information directly from individuals under the age of 18. Instead, personal information relating to minors may be entered into or uploaded to our platform by our clients, including NDIS providers, aged care providers, support coordination businesses and other care-based organisations, in connection with the services they provide.

Where our clients collect, upload or otherwise provide personal information relating to a minor, our clients are responsible for ensuring they have obtained all consents, authorities and notices required under applicable law, including from a parent or guardian where required.

If you are a parent or guardian seeking access to, correction of, or deletion of a minor's personal information entered into our platform by one of our clients, you should contact the relevant care organisation directly in the first instance, or contact us at [support@takecareos.com](mailto:support@takecareos.com).

### **4 HOW WE COLLECT PERSONAL INFORMATION**

We may collect personal information either directly from you, or from third parties, including where you:

- (a) contact us through our website;
- (b) receive goods or services from us;
- (c) submit any of our online sign up forms;
- (d) communicate with us via email, telephone, SMS, social applications (such as LinkedIn or Facebook) or otherwise;
- (e) interact with our website, social applications, services, content and advertising; and
- (f) invest in our business or enquire as to a potential purchase in our business.

Most personal information stored in our platform is entered, uploaded, or otherwise provided by our customer organisations and their authorised personnel. This may include information about their staff, contractors, administrators, participants, residents, clients and other individuals receiving services from them. We generally do not collect information directly from participants, residents or clients receiving care or support. Instead, that information is usually provided to us by the relevant care organisation through its use of our platform.

We may also collect personal information from you when you use or access our website or our social media pages. This may be done through use of web analytics tools, 'cookies' or other similar tracking technologies that allow us to track and analyse your website usage. Cookies are small files that store information on your computer, mobile phone or other device and enable and allow the creator of the cookie to identify when you visit different websites. If you do not wish information to be stored as a cookie, you can disable cookies in your web browser.

We may also collect GPS or location information where a user enables location services and uses platform features that require location data, such as clock-in, clock-out or travel logging.

We may use analytics software and similar technologies to collect and process data about how users interact with our website, platform and related services, including where those services interact with third party websites, apps or integrations. We use this information to monitor performance, improve functionality and enhance the user experience. If you provide personal information to us about another person, including where you are a customer organisation or authorised user entering participant, resident, client or other third-party information into our platform, you must have authority to do so and must ensure that any required consents and notices are obtained or given in accordance with applicable law.

### **5 USE OF YOUR PERSONAL INFORMATION**

We collect and use personal information for the following purposes:

- (a) to provide goods, services or information to you;
- (b) for record keeping and administrative purposes;
- (c) to provide information about you to our contractors, employees, consultants, agents or other third parties for the purpose of providing goods or services to you;

- (d) to improve and optimise our service offering and customer experience;
- (e) to operate, maintain, support and improve our platform and related services;
- (f) to create, manage and administer user accounts and customer accounts;
- (g) to host, store, process, organise and make available information uploaded to our platform by customer organisations and their authorised users;
- (h) to operate analytics, service monitoring, troubleshooting, testing and product improvement activities;
- (i) to provide and improve AI-powered features and related functionality made available through our platform;
- (j) to comply with our legal obligations, resolve disputes or enforce our agreements with third parties;
- (k) to send you marketing and promotional messages and other information that may be of interest to you and for the purpose of direct marketing (in accordance with the Spam Act). In this regard, we may use email, SMS, social media or mail to send you direct marketing communications. You can opt out of receiving marketing materials from us by using the opt-out facility provided (e.g. an unsubscribe link);
- (l) to send you administrative messages, reminders, notices, updates, security alerts, and other information requested by you; and
- (m) to consider an application of employment from you.

We may disclose your personal information to cloud providers, contractors and other third parties located inside or outside Australia where reasonably necessary to operate our platform and provide our services. All primary data stored in our platform, including databases and files, is hosted by AWS using infrastructure in Australia. We also use trusted third-party service providers to support functions such as analytics, AI processing, email delivery, maps and geocoding, document conversion and integrations. Some of these providers may process personal information outside Australia as part of delivering their services. Where AI-powered features are used, data stored in our platform may be processed in part or in whole by third-party AI service providers, and we take reasonable steps to ensure those providers are engaged under terms that prohibit them from using submitted data for model training or other unauthorised purposes. Where third-party providers process personal information for us, we take reasonable steps to ensure they handle that information in a manner consistent with applicable privacy laws and do not use it for unauthorised purposes. We do not sell personal information to any third party.

## **6 AI FEATURES**

We may use AI-powered tools and related technologies as part of our platform functionality. These tools may assist with processing, analysis, recommendations, drafting or other platform features, but are not intended to replace human review or decision-making by our clients. If you have any questions about how these features operate, you may contact us at [support@takecareos.com](mailto:support@takecareos.com).

## **7 SECURITY**

We take reasonable steps to ensure your personal information is secure and protected from misuse, interference, loss and unauthorised access, modification or disclosure. Our information technology systems are password protected, and we use a range of administrative and technical measures to protect these systems, including encryption of primary data at rest and in transit. If we become aware of an eligible data breach, we will respond in accordance with our obligations under applicable privacy laws, including the Notifiable Data Breaches scheme where applicable.

## **8 DATA RETENTION AND DELETION**

We retain personal information for as long as reasonably necessary to provide our platform and related services, comply with legal obligations, resolve disputes and enforce our agreements.

In general, personal information stored in our platform is retained for as long as the relevant client organisation's account remains active. After termination or expiry of a client organisation's account, personal information may be retained for a reasonable period to allow the client organisation an

opportunity to export its data, after which it may be deleted or de-identified unless we are required or permitted by law to retain it for longer.

## **9 LINKS**

Our website may contain links to other websites. Those links are provided for convenience and may not remain current or be maintained. We are not responsible for the privacy practices of those linked websites and we suggest you review the privacy policies of those websites before using them.

## **10 REQUESTING ACCESS OR CORRECTING YOUR PERSONAL INFORMATION**

If you wish to request access to the personal information we hold about you, please contact us using the contact details set out below including your name and contact details. We may need to verify your identity before providing you with your personal information. In some cases, we may be unable to provide you with access to all your personal information and where this occurs, we will explain why. We will deal with all requests for access to personal information within a reasonable timeframe.

Where a request relates to information entered into our platform by one of our customer organisations, we may direct the request to that organisation in the first instance, particularly where that organisation is responsible for the relevant record and is better placed to respond. Participants, residents, clients and other individuals whose information has been entered into the platform by a care organisation should generally direct requests for access to or correction of their information to the relevant care organisation first.

If you think that any personal information we hold about you is inaccurate, please contact us using the contact details set out below and we will take reasonable steps to ensure that it is corrected.

## **11 COMPLAINTS**

If you wish to complain about how we handle your personal information or believe your privacy has been seriously invaded, please contact us using the details provided below with your name and contact details. We will investigate your complaint promptly and respond within a reasonable timeframe. If you are not satisfied with our response, you may make a complaint to the Office of the Australian Information Commissioner.

## **12 SENSITIVE INFORMATION**

We may collect, store, maintain, use and disclose sensitive information, including health information, disability information and government identifiers such as NDIS participant numbers, in connection with the operation of our platform and the services provided through it.

In most cases, this sensitive information is entered into or uploaded to our platform by our customer organisations and their authorised users.

If you are a customer organisation or authorised user entering sensitive information into our platform, you are responsible for obtaining any consents and providing any notices required under applicable law in relation to the collection and disclosure of that information.

Where sensitive information is processed through AI-powered features, we take reasonable steps to ensure that the relevant third-party AI providers are engaged under terms that prohibit them from using submitted data for model training or other unauthorised purposes.

## **13 CONTACT US**

For further information about our privacy policy or practices, or to access or correct your personal information, or make a complaint, please contact us using the details set out below:

**Email:** [support@takecareos.com](mailto:support@takecareos.com)

Our privacy policy was last updated on 9 April 2026.