SURYA – PRIVACY POLICY

Rishi Tech Pty Ltd t/as Surya (ACN 670 636 969) (**we**, **us** or **our**) is committed to protecting your privacy. This policy explains how we collect, use and protect your personal information. It applies to all personal information we handle, whether we collect it through our website, in person, or through other means.

Quick overview

- We collect information you provide to us and information we gather when we interact with you
- We use this information to provide our services and improve your experience
- We protect your information using secure systems and processes
- You have rights regarding your personal information, including access and correction rights

Information we collect

Identity and contact details

- Name, address, email address and phone number
- Professional details

Service related information

- Payment and transaction details for products and services you've purchased from us or enquiries about our products and services
- Your preferences for our services and your marketing preferences
- Feedback and survey responses

Digital information

- IP address and general location information derived from your IP address
- Profile data including your username and password for Surya, profile picture, work on projects you have done with us, data and information you send receive and share through our platforms
- Search and browsing behaviour
- Website usage patterns
- Cookie preferences

Recordings

- Call recordings
- Records of meetings and decisions

Professional information (for job applicants and workers)

- Employment history
- Professional experience
- Required authorisations and licences
- Professional registrations
- Information about your right to work in the relevant jurisdiction

Sensitive Information

We handle sensitive information with extra care and protection, and we only collect this information with your consent or when legally permitted. This includes:

Background information

- Criminal record checks (if we need to verify your background before hiring you)
- Professional memberships (to assess the suitability for employment)

How we collect personal information

- **Directly from you when you:** interact with us, contact us, fill out forms.
- **After given express permission when you:** visit our website, use our technologies, interact with our online services.
- **From third parties:** service providers, business partners, public sources, government organisations and organisations or people authorised by you.
- **From publicly available sources:** such as ASIC and other regulatory bodies and professional networking sites such as LinkedIn.

Why we collect, hold, use and disclose personal information

We collect and use your personal information to run our business and provide our services as set out below.

Business operations

- To manage our relationship with you as a customer or supplier
- To enable you to access and use our software, including to provide you with a login
- To process and deliver our products and services
- To handle your inquiries, support requests, and communications
- To maintain accurate records for billing and administration

Client onboarding and verification

- To assess whether to take you on as a new client or provide services to you, including performing anti-money laundering, anti-terrorism, sanction screening, fraud and other background checks when required or permitted by law
- To retain records of verification checks as required by law

Communication and support

- To respond to your questions and support requests
- To communicate important updates about our services
- To handle inquiries made through our website or platforms
- To manage your participation in surveys, feedback sessions, or events

Service improvement

- To conduct analytics and market research
- To improve our business operations and services
- To develop and enhance our applications and platforms
- To understand how our services are used

Marketing and promotions

- To send you promotional information about our services and events
- To inform you about products or services that may interest you
- To manage your marketing preferences

- To run competitions, promotions, and special offers
- To provide additional benefits to our customers

Employment purposes

- To assess employment applications
- To evaluate candidate qualifications
- To manage professional certifications and licences
- To maintain employment records

Legal and compliance

- To comply with our legal obligations
- To respond to court orders or legal processes
- To maintain required business records
- To fulfill regulatory requirements or reporting obligations
- To protect our legal rights and interests or as authorised by law

Our disclosures of personal information to third parties

We may disclose personal information to:

Service providers

- IT service providers
- Other service providers on an as-needed basis to coordinate on projects or through product development

Professional advisers, on an as-needed basis

- Bankers
- Auditors
- Insurers and insurance brokers
- Legal advisers

Business partners

- Our existing or potential business partners
- Our contractors

Corporate transactions

If we merge with or are acquired by another company, or sell our business assets:

- Your information may be disclosed to our advisers
- Your information may be disclosed to the potential purchaser's advisers
- Your information may be included in the transferred assets

Legal and regulatory bodies

- Courts and tribunals
- Regulatory authorities including as required for reporting obligations
- Law enforcement officers

Other parties

- Third parties you have authorised
- Emergency services when necessary
- Any other parties as required or permitted by law

Overseas disclosure

Storage and access

We store your personal information in Australia. However, your information may be accessed from or transferred to locations outside Australia in these circumstances:

- When our service providers are located overseas
- When we work with overseas business partners
- When using cloud-based services or data storage solutions

Our approach to overseas disclosure

Before disclosing your personal information overseas, we take reasonable steps to ensure that the recipient treats your information in accordance with applicable law by only sending what is necessary, requiring recipients to protect your information through contractual agreements which require the recipient to comply with the privacy standards in applicable law or through other mechanisms that provide comparable safeguards and by monitoring how recipients handle your information.

Your privacy rights and choices

Providing information

You can choose whether to provide personal information to us, however, if you don't provide certain information, we may not be able to provide some services. Let us know if you don’t want to provide information and we will let you know when information is required versus optional.

Access to your information

You can request access to the personal information we hold about you and we will respond to your request within a reasonable time. We may charge a reasonable administrative fee for providing access and if we cannot provide access, we will explain why and explore alternative ways to share relevant information.

Correction rights

You can ask us to correct any information that is inaccurate, out of date, incomplete, irrelevant or misleading and we will take reasonable steps to correct your information promptly. If we cannot make the correction, we will explain why and discuss alternatives. You can ask us to add a statement to your information noting your requested correction.

Marketing communications

You can opt-out of receiving marketing communications at any time. Each marketing communication will include an unsubscribe option. You can change your marketing preferences by contacting us. We will process your request as soon as practicable.

How to contact us about your rights or to make a complaint and what happens next

Step 1: Contact our privacy officer

- Email: jconnellan@rishitech.co ccing projects@rishitech.co
- Phone: +61 433 573 267
- Post: Level 2, Building 58/1-59 Quay St, Haymarket, NSW, 2000

What to include:

Your full name, contact details, clear details about your request or complaint, and any relevant dates or reference numbers.

Step 2: Our response

We will:

- Verify your identity before processing your request
- Investigate thoroughly (for complaints) or process your request (for rights)
- Respond to you in writing within reasonable timeframes and as required by law
- Explain what actions we will take and keep you updated on progress
- Not charge you for making a request (except for reasonable access fees if applicable)
- Help you understand and exercise your rights

Step 3: If you're not satisfied (complaints only)

If you're not satisfied with our response to your complaint, you can:

- Ask for a review by our senior management, or
- Contact external bodies:
- Australian residents: Office of the Australian Information Commissioner (Phone: 1300 363 992, Website: www.oaic.gov.au)

This is the same process whether you want to access your information, correct mistakes, change marketing preferences, or make a complaint about our privacy practices.

Protecting your information

We use multiple layers of security to protect your information.

Technical safeguards

- Enterprise-grade encryption for data storage and transmission
- Regular security testing and monitoring
- Automated threat detection systems

Operational security

- Staff training on security and privacy
- Strict access controls based on job requirements
- Regular security audits and incident response procedures testing

Physical security

- Secure premises with controlled access
- Secure disposal of physical documents
- Equipment security protocols

Public information

Please note that any information you choose to share publicly on online platforms (such as comments or reviews) can be accessed and used by others. We cannot control or protect information that you make publicly available.

How long we keep your information

We keep your personal information only as long as we need it for the purposes we collected it, or as required by law. When we no longer need it, we securely destroy or de-identify it.

Cookies and Analytics

What We Use

We use cookies, tracking pixels, and similar technologies on our website and in our emails to improve your experience and our services.

Cookies

- Small text files stored on your device
- Help remember your preferences
- Enable certain website functions
- Make your interactions with our website more efficient

Tracking Pixels

- Tiny, invisible images in web pages and emails
- Help us understand how you interact with our content
- Allow us to measure email engagement
- Enable more relevant content delivery

How we use these technologies

Essential Functions

- Remember your login status
- Maintain your session security
- Store your preferences
- Enable core website features

Analytics and Performance

- Understand how our website is used
- Measure page views and traffic
- Analyse user navigation patterns
- Identify areas for improvement

Personalisation

- Remember your preferences
- Tailor content to your interests
- Improve your browsing experience
- Provide relevant recommendations

Your control

You can manage these technologies by:

- Adjusting your browser settings to block or delete cookies
- Using privacy-focused browser extensions
- Configuring your email client to block images
- Using our cookie preference settings

Note: Blocking all cookies may affect website functionality and your user experience.

Analytics

We use Google Analytics or similar products to understand how people use our website and product. This involves cookies that collect information about your browsing activity. You can opt out of Google's advertising features through your Google account settings, browser add-ons, or your device's privacy settings. Google provides various tools and options to control how your data is used for advertising purposes. You can learn more about how Google uses your data and your available options on Google's privacy pages.

Artificial Intelligence (AI) Technologies

Overview

We use artificial intelligence and machine learning technologies to support and enhance the functionality of our Platform and our internal business processes, including AI tools provided by third parties where applicable. We only use these technologies when legally permitted and necessary for our business.

How we use AI

We may use AI technologies to:

- power the chatbot feature within our platform, which provides generic guidance on navigating and using the Platform;
- assist in product development;
- run simulations, testing and quality checks on our platform;
- conduct analysis and data processing; and
- improve and optimise our services and operations.

No public AI training

We do not use your personal information to train publicly available or public foundation AI models.

Internal AI usage and data protection

AI processing is carried out within secure environments controlled by us, and is only used for the purpose of delivering, maintaining, supporting or improving our services, subject to our privacy obligations. Where we engage a third-party AI provider, we ensure that provider handles your personal information in accordance with applicable privacy laws through contractual requirements and appropriate safeguards.

Data protection and security

When we work with third-party AI providers, we ensure they handle your personal information in accordance with privacy laws through contractual requirements and appropriate safeguards.

Your rights and our commitments

Any information generated or inferred about you by AI technologies is treated as personal information, and you maintain all the rights outlined in this privacy policy. When using AI with your personal information, we commit to:

<u>Transparency and control</u>

- We'll inform you when AI is used to make decisions that may significantly affect you
- We maintain human oversight and review of significant AI-generated decisions
- Our staff are trained to understand AI limitations and verify outputs before relying on them
- We implement processes to verify the accuracy of AI-generated outputs

<u>Security</u>

- We use appropriate technical and organisational measures to maintain the security and integrity of your personal information
- We regularly test and monitor AI outputs for accuracy and reliability

Risk mitigation

- We regularly assess and document risks associated with using AI to process personal information
- We implement appropriate measures to address these risks
- We continuously monitor AI performance and regularly review their impact

Amendments

We may update this policy at any time by posting the revised version on our website. We recommend that you review our website regularly to stay current with any policy changes.

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