# **Efficiency Leaders – Privacy Policy**

Version: 1.0

Effective Date: 15 September 2025

#### 1. Introduction

This Privacy Policy explains how Efficiency Leaders collects, uses, discloses, and protects your personal information when you access the RapidP2P Platform and related services.

This Policy forms part of the contractual framework governed by the Master SaaS Agreement and Accepted Proposal.

A copy of this Privacy Policy and related legal documents is available at: <a href="https://efficiencyleaders.com.au/legal">https://efficiencyleaders.com.au/legal</a>

#### 2. Collection of Personal Information

We collect personal information that is necessary to provide our services, operate the RapidP2P Platform, and meet our legal obligations. This may include:

- Name and contact details
- Job title and employer
- Login credentials and usage logs
- Communication preferences and support requests

We may collect this information directly from you, from your organisation, or via integrations with third-party systems.

#### 3. Use of Personal Information

We use your personal information to:

- Provide access to the Platform and support services
- Manage our business operations and Customer relationships
- Monitor and improve platform performance
- Respond to queries, feedback or incidents
- Comply with legal and contractual obligations

# 4. Legal Basis for Processing (GDPR)

If you are located in the UK or EU, we process your personal data based on:

- Performance of a contract
- Compliance with legal obligations
- Legitimate business interests
- Consent (where explicitly required)

#### 5. Disclosure to Third Parties

We do not sell or rent your personal information. We may disclose your personal information to:

- Our employees, contractors and related entities
- Third-party service providers (e.g. hosting, analytics, support tools)
- Government or regulatory authorities if legally required
- Other parties with your express consent

## 6. Security

We implement appropriate technical and organisational measures to safeguard personal information, including:

- Encrypted data transfer and storage
- Access controls and multi-factor authentication
- Regular vulnerability assessments

Our practices are aligned with ISO 27001 principles.

#### 7. Access and Correction

You may request access to or correction of your personal information by contacting us at <a href="mailto:privacy@efficiencyleaders.com">privacy@efficiencyleaders.com</a>. We will respond within a reasonable timeframe.

#### 8. Retention

We retain personal information only for as long as necessary to fulfil the purposes outlined in this Policy, or as required by law or contractual obligations.

### 9. Storage and Data Location

All Customer data is hosted in Australia.

We do not transfer personal information overseas unless required by a service dependency (e.g. third-party integration) or where you have provided consent.

## 10. Cookies and Analytics

Our websites and platforms may use cookies or similar technologies to improve user experience, monitor performance, and support troubleshooting. You can adjust your browser settings to disable cookies if preferred.

### 11. Third-Party Integrations

Where you enable third-party integrations (e.g. ABBYY FlexiCapture or Peppol), you acknowledge that data may be shared with or processed by these parties under their respective privacy policies.

### 12. Direct Marketing

We may send marketing communications related to our services. You can opt-out at any time using the unsubscribe link provided or by contacting us.

### 13. Children's Privacy

Our services are intended for business use only and not directed to individuals under 18 years of age.

#### 14. Contact Us

For privacy-related enquiries, please contact us via the contact form on our website:

https://efficiencyleaders.com.au/contact

### 15. Complaints

If you have a complaint about how we handle your personal information, please contact us using the details above. If unresolved, you may contact the Office of the Australian Information Commissioner (OAIC) or your local data protection authority.

### 16. Changes to This Policy

We may amend this Privacy Policy from time to time to reflect changes in legal requirements or our practices.

Any updates will be effective upon publication. The most current version is available at: <a href="https://efficiencyleaders.com.au/legal">https://efficiencyleaders.com.au/legal</a>

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