

Privacy Policy

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ABN: 69 683 331 919

Helping Regional QLD businesses to turn carbon challenges into opportunities

Privacy Policy - Aethiro Pty Ltd.

Effective Date: 2nd January 2025

Aethiro Pty Ltd. (ABN 69 683 331 919), based in Gladstone, Queensland, Australia, ("Aethiro", "we", "our", "us") is committed to protecting your privacy. The term GHG, in this document, covers all greenhouse gases, which have the impact on business's carbon footprint. This policy explains how we collect, use, store, and disclose your information when you visit or interact with our services on:

- aethiro.com
- book.aethiro.com
- forms.aethiro.com

1. Information we collect

1.1 Client & prospect data

- Business identifiers: Company Name, ABN, Industry sector, Employee count
- Contact details: Contact person's first & last name, email address, phone number
- Emissions & spend:
 - Spend and activity data for GHG inventory, wherever applicable to measure all GHG inventory, and emissions for Scope 1, 2 and 3.
 - Spend-based emissions: transaction-level or summary spend data imported from accounting platforms (Xero, QuickBooks, et al.) via Sumday, used only to convert this data into emission in form of tonnes of CO₂-e
- Supplier/vendor services: high-level service categories, and service provided to our clients, only for the reasons to measure GHG inventory (no names or profiles), unless required by report requirements.

1.2 Website & marketing data

• Usage analytics: page views, session length, and similar via Google Analytics and Zoho PageSense

We do not collect sensitive personal data (e.g. health, financial ID) and never sell or rent your information to third parties.

2. How we use your information

We use your data to:

- 1. Deliver carbon-accounting reports, advisory services and related support.
- 2. Integrate and analyse financial transaction data (via Sumday & connected financial bookkeeping platforms) to calculate spend-based emissions.
- 3. Respond to enquiries and fulfil resource downloads.
- 4. Improve our website, tools and service offerings.
- 5. Comply with legal obligations (e.g. tax, record-keeping).

3. Data storage & security

| Data Type | Location | Security Measures |
|----------------------------------|--|--|
| Client data & work papers | Zoho WorkDrive (AU data centres) | MFA, role-based access, encryption at rest and in transit |
| Financial emissions data | Sumday platform (secure cloud) | Access via API, Sumday's encryption and access controls |
| Internal/non-client documents | Microsoft OneDrive (AU region) | Microsoft 365 controls, |
| Local processing | Desktop & mobile devices running Zoho apps | All traffic via Nord VPN; device encryption; screen- lock; endpoint protection |

4. Third-party services

| Service | Purpose | Privacy Policy Link |
|-----------------------------------|------------------------------------|--|
| Zoho One (inc. Zia AI) | CRM, analytics, forms, workflows | https://www.zoho.com/privacy.html |
| OpenAl API via Zoho Zia | Drafting anonymised summaries only | https://openai.com/policies /privacy |
| Sumday | Carbon-accounting platform | https://www.sumday.io/privacy-policy/ |
| Google Analytics & Zoho PageSense | Website traffic analysis | https://policies.google.com/ privacy, |
| Zoho PageSense | Website traffic analysis | https://www.zoho.com/priv acy.html |
| Microsoft OneDrive | Internal business documents | https://privacy.microsoft.co m/en-us/privacystatement |

5. Data retention & deletion

- We keep your data for two (2) years from the date of last service.
- You may request deletion at any time; we will erase or anonymise data within 6 months (minimum) and no later than 2 years (maximum) of your request.
- Each new engagement resets the two-year retention period.

6. Your rights

Under the Australian Privacy Act, you may:

- Access your personal information
- Correct any errors

• Delete your data in line with section 5

• Withdraw consent to specific uses

To exercise these rights, email us at privacy@aethiro.com. We'll acknowledge within 7

business days and aim to complete your request within 30 days (or up to 60 days if complex).

7. Data breach & complaints

If you believe there's been a privacy breach, please contact us immediately. We follow the

Australian Information Commissioner's Notifiable Data Breaches scheme and will notify

affected individuals as required.

8. Changes to this policy

We may update this policy from time to time. The current version and effective date will

always be available at www.aethiro.com/privacy

9. Contact us

Aethiro Pty Ltd.

Gladstone, QLD, Australia

Email: privacy@aethiro.com