CLAWZ – PRIVACY POLICY

Last Updated: 11 November 2025

Clawz Collective Pty Ltd (ACN 686 711 624) of Suite 17, 207 Buckley Street, Essendon, Victoria 3040 ("**Clawz**", "**we**", "**us**" or "**our**") is committed to providing quality services to you and to respecting your privacy.

This privacy policy ("**Privacy Policy**") sets out how we collect, use, process, store, share and disclose your Personal Information from the operation of our website https://clawz.com.au/ ("**Website**"), the Clawz platform, which is a SaaS automated tool for contract administration and compliance notifications, designed to help clients effectively manage and comply with their contractual obligations ("**Clawz**") and related services (each of the Website, Clawz and associated services, together the "**Services**").

Please note that if you are a customer or user of Clawz, by registering for or using any of our Services, you are deemed to have agreed to Clawz' Terms of Use, which incorporate and include this Privacy Policy.

We are committed to protecting your privacy and respecting and upholding your rights under the Australian Privacy Principles ("**APPs**") contained in the Privacy Act 1988 (Cth) and the General Data Protection Regulation ("**GDPR**"), and if applicable, the California Consumer Privacy Act ("**CCPA**"), the California Privacy Rights Act ("**CPRA**") and any other relevant laws on privacy of individuals in jurisdictions which our Services are available (collectively, "**Privacy Laws**").

We are a data controller under the GDPR; however, in certain circumstances, we may also act as a data processor. In either case, we take all necessary and reasonable steps to comply with the applicable Privacy Laws and to address any inquiries or complaints from individuals regarding our compliance with those laws.

By accessing or using our Services, you voluntarily and expressly consent to the collection, use, processing, storage, and disclosure of your Personal Information by us, in accordance with this Privacy Policy

1. INFORMATION COLLECTED BY CLAWZ

Personal Information refers to any information or data that relates to an identified or reasonably identifiable natural person. This includes information that can directly or indirectly identify an individual-such as a name, identification number, location data, online identifier, or one or more elements specific to a person's physical, physiological, genetic, mental, economic, cultural, or social identity.

The types of Personal Information we may collect include:

CATEGORY	DESCRIPTION
Identification and Contact Information	Your full name, date of birth, gender, mailing address, email address, phone number(s), profession, role, and place of employment.
Billing and Financial Information	Your credit or debit card details (collected via a secure third-party payment provider) and your ABN, if applicable.
Device and Traffic Data	Information such as device ID, device type, IP address, geolocation, screen resolution, browser type, operating system, session duration, referral sources, page views, and standard web log data.
Service-Related Information	Details regarding the products or Services you have purchased, used, or inquired about, as well as any information necessary to support or deliver those Services.
User-Provided Information	Additional information you choose to provide directly or indirectly through your interactions with us, such as through your use of our Services or participation in user research or surveys.
Content Data	Information you post, upload, view, or engage with through Clawz, social media, or any third-party services integrated with our platform.
Feedback and Survey Responses	Information you submit in response to customer feedback requests, surveys, or similar engagement activities.
Biographical Data	Information you provide when applying for a job, internship, or similar opportunity with Clawz.
Other Information	Any other Personal Information required to facilitate your relationship with us, which may include horse-related data (e.g., performance, welfare, and training metrics), role-specific details, or engagement analytics captured during your use of our Services.

2. HOW WE COLLECT YOUR PERSONAL INFORMATION

We collect Personal Information only through lawful and fair means, and in a non-intrusive manner. In most cases, we collect Personal Information through one or more of the following methods:

- directly from you, when you provide information or otherwise interact with us;
- automatically, through your use of our Services, including via cookies, tracking technologies or log data; and
- from third-party sources, such as business partners, data providers, or publicly available databases, which may include demographic details, marketing insights, or information about your preferences and interests.

If you choose to use a pseudonym or withhold identifying information, we may be unable to provide some or all aspects of our Services to you. We ask that individuals provide accurate, current, and complete Personal Information at the time of collection to enable us to deliver our Services effectively and in accordance with relevant Privacy Laws.

3. HOW WE TREAT PERSONAL INFORMATION THAT IS ALSO SENSITIVE PERSONAL INFORMATION

We do not collect sensitive or special categories of Personal Information (as defined under applicable Privacy Laws) unless we have obtained your express consent or are otherwise permitted or required to do so by law. Sensitive

Personal Information includes details such as your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, health information, criminal history, and information concerning your sex life or sexual orientation.

If you voluntarily provide such sensitive Personal Information and no legal exemption applies, we require that you provide explicit consent to our collection, use, and disclosure of that information in connection with your use of our Services. Where consent is provided, we may use or disclose your sensitive Personal Information only for purposes directly related to the primary reason for which it was collected, including:

- delivering our Services or features that specifically require this type of information; and
- conducting data analytics to improve our Services, where such use is consistent with your consent and relevant Privacy Laws.

Sensitive Personal Information may also be used or disclosed where required or authorised by law.

4. INFORMATION ABOUT USERS UNDER THE MINIMUM LEGAL AGE

Our Services are not intended for individuals who are under the minimum legal age required to lawfully use Clawz in their country of residence. If we become aware that we have collected Personal Information from a user below this age, we will take all reasonable steps to delete that information, discontinue its use, and deactivate any associated accounts as soon as practicable.

5. HOW YOUR PERSONAL INFORMATION IS USED

We use, process, and disclose your Personal Information for the purposes for which it was collected or for purposes directly related to those purposes.

CATEGORY	DESCRIPTION
Use, Processing, and Disclosure of Personal Information	These may include, but are not limited to: (a) providing our Services to you; (b) administering, protecting, improving, and optimising our Services; (c) managing, operating, and developing our Services and growing our business, including through data analytics, market research, and evaluating the effectiveness of our marketing, promotional campaigns, events, advertisements, and publications; (d) diagnosing and resolving technical issues; (e) creating industry reports based on de-identified or aggregated data; (f) verifying your identity and/or age; (g) billing and processing payments for our products and Services; (h) informing you about our Services, products, rewards programs, surveys, contests, or other promotional activities or events that we sponsor or manage; (i) responding to your inquiries, feedback, or comments; (j) taking actions we consider reasonably necessary to protect the integrity, security, or proper functioning of our Services;

CATEGORY	DESCRIPTION
	(k) maintaining and developing our business systems and infrastructure, including through system testing and upgrades; (l) any purpose to which you have expressly consented; (m) training, testing, and improving artificial intelligence (AI) models, systems, or machine learning algorithms (including any underlying architectures, models, or weights) used by us or our contractors and service providers; and any other use as required or authorised by relevant Privacy Laws, including for the purpose of detecting, investigating, and preventing policy violations, fraud, unlawful activity, or to protect the rights and safety of Clawz, our users, or others.
Direct Marketing	Where we: (a) have obtained your express consent; (b) have a valid legal basis; or (c) are otherwise permitted under relevant Privacy Laws, we may use your Personal Information to send you information about our products, services, or special events that we believe may be of interest to you.

6. WHO WE MAY NEED TO DISCLOSE YOUR PERSONAL INFORMATION TO

We may disclose your Personal Information to the following categories of recipients, where such disclosure is necessary and consistent with the purposes outlined in this Privacy Policy:

CATEGORY	DESCRIPTION
Outsourcing Companies	Third-party service providers that we engage from time to time to perform functions on our behalf, for the purposes set out in this Privacy Policy.
Analytics Providers	As part of measuring, providing, and improving our Services, we may engage analytics providers that use tracking technologies across our Website, Clawz platform, and associated software to monitor usage, visits, and traffic.
Related Bodies Corporate	We may share your Personal Information with entities within the Clawz corporate group, including related bodies corporate and affiliates (such as Clawz Holdings Pty Ltd ACN 687 268 113) ("**Related Bodies**") for purposes consistent with this Privacy Policy, including but not limited to: (a) **Service Delivery**: Facilitating access to and provision of our Services, including performance management, customer support, bug fixes, improvements, and account management. (b) **Operational Efficiency**: Enhancing internal operations such as data analysis, system maintenance, and risk management. (c) **Combined Services**: Offering integrated services or products in collaboration with Related Bodies. (d) **Legal and Regulatory Compliance**: Fulfilling obligations related to fraud prevention, anti-money laundering, taxation, and other applicable laws. Where we disclose Personal Information to Related Bodies, we ensure that such entities are subject to appropriate confidentiality and data protection obligations in accordance with this Privacy Policy and applicable Privacy Laws.
Employees, Contractors, and Business Partners	Your information may be shared with our employees, contractors, and trusted partners as necessary to provide our Services or for purposes aligned with this Privacy Policy.
Consented Third Parties	Any person or entity to whom you have explicitly consented to us disclosing your Personal Information.
External Advisors	Our external professional advisors, including auditors, legal counsel, insurers, and financial consultants.
Payment Providers	Third-party payment processing providers are engaged to facilitate billing and financial transactions.

CATEGORY	DESCRIPTION
Legal and Regulatory Authorities	Entities or individuals to whom we are legally required or authorised to disclose Personal Information under applicable Privacy Laws.
Disclosure to Service Providers Outside the Clawz Group	We will only disclose your Personal Information to external entities outside the Clawz group where it is necessary and appropriate for the purpose for which the information was collected. This may include disclosure to: (a) IT service providers; (b) data storage providers; (c) web-hosting and server providers; (d) debt collection agencies; (e) technical maintenance or troubleshooting providers; (f) marketing agents or subcontractors assisting with information, product, or service delivery; (g) payment systems operators, (each a "**Service Provider**"). We will take all steps reasonably necessary to ensure that your Personal Information is treated securely and processed only in accordance with this Privacy Policy. For the purposes of this Privacy Policy, "processing" refers to any operation or set of operations performed on Personal Information, whether by automated means or not. This includes, but is not limited to collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise making available such information.

7. HOW WE STORE AND PROTECT YOUR PERSONAL INFORMATION

We implement all reasonably necessary measures to protect the Personal Information we collect through our Services, which is stored electronically. We take reasonable steps to safeguard your Personal Information against misuse, interference, loss, as well as unauthorised access, modification, or disclosure. These measures include physical, administrative, personnel, technical, electronic, and managerial safeguards such as pseudonymisation and encryption.

These principles are consistently applied to the collection, storage, and use of personal information of our users, customers, and clients. However, while we strive to protect your Personal Information, we cannot guarantee the absolute security of any information transmitted over the internet. By providing your Personal Information to us, you acknowledge and accept the inherent risks involved.

To the fullest extent permitted by law, we shall not be liable for any unauthorised access, modification, disclosure, or misuse of your Personal Information, nor any resulting damages or liabilities. If we no longer require your Personal Information for the purposes set out in this Privacy Policy, or as otherwise required by applicable Privacy Laws, we will take reasonable steps to securely destroy or de-identify such information.

8. WHAT IS OUR LEGAL BASIS?

Under the GDPR, we are required to have a lawful basis to process Personal Information collected from individuals residing in the European Union. We rely on the following legal bases to process your Personal Information:

- where processing is necessary to provide you with access to and use of the Services;
- for our legitimate interests in providing, operating, and improving our Services;
- where you have given your explicit and informed consent to such processing, which you may withdraw at any time; or
- where we have a legal obligation to process your Personal Information.

9. CROSS-BORDER DISCLOSURE OF PERSONAL INFORMATION

We may disclose your Personal Information to third-party recipients located within or outside the jurisdiction where your Personal Information was provided, to deliver our Services to you. As of the date of this Privacy Policy, such third-party recipients may be in countries whose data protection laws have not been recognised by the European Commission as providing an adequate level of protection for Personal Information.

To safeguard your information, we take reasonable care to engage subcontractors and service providers who we believe adhere to acceptable standards of data security and compliance.

By transacting with us, you consent to the disclosure or transfer of your Personal Information to these third-party recipients. You acknowledge and agree that we will take reasonable steps, under the circumstances, to ensure that such information is handled following applicable Privacy Laws. However, to the extent permitted by law, you agree that we shall not be liable to you or any third party for any breach of Privacy Laws by such third-party recipients.

10. DIRECT MARKETING AND COMMUNICATIONS

Where we:

- have obtained your explicit consent (which you may withdraw at any time by contacting us in writing at info@clawz.com.au;
- have a valid legal basis to do so; or
- are otherwise permitted under applicable Privacy Laws,

we may use and process your Personal Information to send you information about our Services, as well as other products and services that we believe may be relevant to you and your interests. Additionally, we may invite you to attend special events.

You may opt out of receiving direct marketing communications from us at any time. Unless you exercise this right to opt out, your consent to receive such communications and for us to process your Personal Information for these purposes will remain in effect. To opt out, you may follow the unsubscribe instructions included in the marketing communication or contact us directly in writing at info@clawz.com.au.

11. COOKIES

We use cookies, web beacons, and similar technologies (collectively, "Cookies") on our Website. By accessing or using this Website, you consent to our storing and accessing Cookies on your device following this Privacy Policy. You have the option to accept or reject the collection of Cookies.

Cookies are small data files stored on, and accessed from, a user's device when visiting a website. They enable authorised web servers to recognise you across different websites, services, devices, and browsing sessions.

Cookies alone do not reveal your email address or other personally identifiable information. However, third parties such as Google and Facebook may use Cookies to display our advertisements on your social media and other online platforms as part of retargeting campaigns. If you provide personal information to our sites, that information may be linked to data stored in those Cookies.

We use Cookies to facilitate your access to and use of our Website, Clawz, and Services, including to:

- identifying users of our Website, Clawz, and Services;
- process user requests;
- enhance user experience;
- remember user preferences;
- monitor and analyse usage of our Website, Clawz, and Services;
- facilitate communication with users;
- control access to certain content; and
- protect our Website, Clawz, and Services.

You may delete or block Cookies by adjusting your browser settings. Please be aware that disabling Cookies may limit your ability to access or fully use certain parts of the Website, Clawz, and Services.

Unless you have set your browser to refuse Cookies, our system will issue Cookies when you access our Website.

12. CHOICES REGARDING YOUR PRIVACY

You may be provided with certain choices regarding the collection and processing of your information, including:

- opting out of or adjusting your Cookie preferences when your device accesses the Website; and
- configuring your browser settings to disable or reject Cookies generally. Please be aware that deleting or blocking Cookies may impair the functionality of our Website, Clawz, and associated Services.

13. NOTICES SPECIFIC TO CERTAIN JURISDICTIONS

We are committed to ensuring that individuals in applicable jurisdictions can exercise their privacy rights as provided by the relevant Privacy Laws. Below, we outline these rights based on your location.

LOCATION	DETAILS
Australia	You have the right to:

LOCATION	DETAILS
	(a) request access to the Personal Information we hold about you; and (b) request correction of any Personal Information we hold about you. On receiving your request, we will provide access to your Personal Information and take reasonable steps to correct it if we determine it is inaccurate, within a reasonable timeframe not exceeding 30 calendar days, unless applicable law permits or requires us to withhold access or correction. If we refuse your request for access or correction, we will notify you in writing, explaining the reasons for our decision. If you do not receive a response within 30 days, or if you are dissatisfied with our response, you have the right to lodge a complaint with the Office of the Australian Information Commissioner via their website: http://www.oaic.gov.au/.
European Economic Area	For the purposes of the GDPR, we are the data controller of your Personal Information. Under the GDPR, individuals residing in the European Union have enhanced privacy rights, including the right to: (a) request correction of any inaccurate or incomplete Personal Information we hold about you; (b) request deletion of your Personal Information in certain circumstances; (c) receive your Personal Information in a portable format for data portability; (d) object to or withdraw your consent to the processing of your Personal Information at any time; (e) object to decisions made solely by automated means that produce legal effects or similarly significant impacts concerning you; and (f) request restrictions on our processing of your Personal Information in certain situations. If we decline your request for access to or correction of your Personal Information, we will provide a written explanation outlining our reasons. Please note that these rights may be limited in certain cases, such as where we are legally required to process your Personal Information. Consequently, we may retain some data even if you withdraw your consent. If we no longer need your Personal Information for the purposes outlined in this Privacy Policy or as otherwise required by applicable Privacy Laws, we will take reasonable steps to destroy or de-identify your Personal Information.
California	If you are a resident of California, please note that we do not sell your Personal Information for any commercial purposes. Under the California Consumer Privacy Act ("**CCPA**"), California residents have the right to know what types of Personal Information we have collected about them and whether this information has been disclosed for purposes described in this Privacy Policy during the past 12 months. We collect and may disclose the following categories of information, using terms as defined in the CCPA: (a) **Identifiers**: Names, physical and email addresses, personal identifiers (including online identifiers such as IP addresses and similar identifiers). (b) **Personal Information Categories**: Names, signatures, physical characteristics, addresses, telephone numbers, state identification numbers, education, employment information, bank account numbers, credit card and debit card numbers. We do not collect or disclose the following categories of information: (a) Protected classification characteristics under California or federal law (e.g., age, race, colour, ancestry, national origin, citizenship, religion or creed, marital status, medical conditions, physical or mental disabilities, sex, sexual orientation, veteran or military status, genetic information). (b) Biometric information (e.g., genetic, physiological, behavioural, or biological characteristics). (c) Internet or similar network activity, including browsing or search history. (d) Geolocation data (physical location or movements).

LOCATION	DETAILS
	(e) Employment history (current or past). (f) Education information that is not publicly available. You have the following rights under the CCPA: (a) The right to access the Personal Information we have collected, used, and disclosed about you in the past 12 months. (b) The right to request the transfer (data portability) of your Personal Information to another entity. (c) The right to request deletion of your Personal Information collected and stored by us and our service providers. (d) The right to request correction of any Personal Information we hold about you. (e) The right to non-discrimination for exercising your privacy rights under the CCPA. To exercise any of these rights, please contact us at: info@clawz.com.au When submitting a request, please provide: • sufficient information for us to reasonably verify your identity or that you are an authorized representative; and • enough detail to understand and evaluate your request. We will strive to respond within a reasonable timeframe. If additional time is required or if there is a delay, we will notify you directly. All communications will be conducted via email, and disclosures will cover only the 12 months preceding your request. If we deny a request, we will provide the reason for the denial.

14. ACCESS, MANAGEMENT OR DELETING YOUR PERSONAL INFORMATION

Subject to certain exceptions provided by applicable Privacy Laws, you may request access to your Personal Information stored in our customer account database or request correction of such information by contacting us at info@clawz.co.au

If we refuse your request for access to your Personal Information, we will provide a written explanation outlining the reasons for our decision. We may charge a reasonable fee, which will not be excessive, to cover the costs of retrieving your Personal Information from our database. However, no fee will be charged for submitting your request.

If you believe that any Personal Information, we hold about you is inaccurate, incomplete, or outdated, you may request that it be amended. We will respond to such requests within a reasonable timeframe and will not charge a fee for correcting your Personal Information.

Where we no longer require your Personal Information for the purposes described in this Privacy Policy, or as otherwise required by applicable Privacy Laws, we will take reasonable steps to destroy or de-identify your Personal Information in accordance with the circumstances.

15. THIRD PARTY SITES AND SERVICES

Our Services may include links to third-party websites and services, including social media platforms and services integrated via APIs. We do not control these third-party websites or services and are not responsible for the protection or privacy of any personal information you provide while accessing them. This Privacy Policy applies solely to the information we collect through our Services.

16. CONTACTING US

If you require further information regarding our Privacy Policy or wish to make a privacy complaint, please contact us:

- Email: info@clawz.com.au
- Address: Suite 17, 207 Buckley Street, Essendon, Victoria 3040, Australia

17. NOTICES AND REVISIONS

We reserve the right to modify this Privacy Policy in whole or in part from time to time without notice. To extent permitted by law, all changes and clarifications will take immediate effect, after the posting of the amended Privacy Policy on the Website.

18. ENFORCEMENT

We will cooperate with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personally identifiable information that cannot be resolved between us and the individual.