

PRIVACY POLICY

Techsphere Services Pty Ltd | ACN 690 376 642

Effective Date	29 May 2026
Version	1.0
Governing Law	Privacy Act 1988 (Cth) — Australian Privacy Principles (APPs)
Jurisdiction	Western Australia, Australia
Contact	privacy@techsphere.net.au

Techsphere Services Pty Ltd (ACN 690 376 642, ABN 14 690 376 642) ("Techsphere", "we", "us" or "our") is committed to protecting the privacy of individuals whose personal information we collect and handle. This Privacy Policy explains how we collect, hold, use, disclose and protect personal information in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs) set out in Schedule 1 of that Act.

This Policy applies to all personal information collected by Techsphere in connection with the products, services, platforms and websites we operate, including our cabling and coving installation services, our online store at www.techsphere.net.au, the KYKLO e-commerce platform, and any associated managed services (collectively, the "Services").

By accessing or using our Services, or by providing us with personal information, you acknowledge that you have read and understood this Policy. If you do not agree with this Policy, please do not use our Services.

1. COLLECTION OF PERSONAL INFORMATION

1.1 What we collect. We collect personal information that is reasonably necessary for us to provide the Services and conduct our business. The types of personal information we may collect include:

- Identity information: full name, job title, employer/company name, ABN/ACN.
- Contact information: email address, phone number, mailing and billing address.
- Account credentials: username, hashed password, and authentication tokens.
- Payment and financial information: billing address and payment method details (processed by our PCI-DSS compliant payment gateway; we do not store full card numbers).
- Technical and usage information: IP addresses, browser type and version, operating system, device identifiers, pages visited, clickstream data, and log files.
- Communications: records of correspondence, support requests, and feedback you send us.
- Business information: ERP data, inventory records, product catalogues, and order data uploaded to the platform by customers or on their behalf.

1.2 How we collect. We collect personal information:

- Directly from you when you register an account, submit an order, complete a form, contact our support team, or otherwise interact with us.
- Automatically via cookies, web beacons, and similar tracking technologies when you use our websites or platform (see Section 9 – Cookies).

- From third parties such as payment processors, identity verification providers, or your organisation's administrators.
- From publicly available sources where permitted by law.

1.3 Sensitive information. We do not intentionally collect sensitive information (as defined in the Privacy Act 1988 (Cth)), such as health, racial or ethnic origin, or criminal record information). If you believe you have inadvertently provided such information, please contact us immediately and we will take steps to delete it.

1.4 Anonymity. Where it is lawful and practicable, you may deal with us anonymously or by pseudonym (for example, when making a general enquiry). However, we cannot provide certain Services (such as creating a subscription account) without identifying you.

2. PURPOSE OF COLLECTION AND USE

We collect, hold, use and disclose personal information only for purposes that are directly related to the provision of the Services or otherwise permitted by the APPs. Our primary purposes include:

- Creating and managing your subscription account and providing access to the platform.
- Processing orders, payments, and invoices.
- Providing technical support, training, and customer service.
- Operating, maintaining, and improving the Services.
- Sending service-related notices and administrative communications (e.g., password resets, billing alerts, maintenance windows).
- Complying with our legal obligations, including obligations under Australian law.
- Detecting, investigating, and preventing fraudulent or unlawful activity and security incidents.
- Analysing usage patterns to improve platform performance and user experience (using de-identified or aggregated data where possible).

We will not use or disclose your personal information for a secondary purpose unless you have consented, or an exception under the Privacy Act 1988 (Cth) applies (e.g., required by law or necessary to prevent a serious threat to life or safety).

Direct marketing. We may send you marketing communications about our Services or related offerings if you have consented or if we reasonably believe you would expect such communications given your existing relationship with us. You may opt out of marketing communications at any time by using the unsubscribe link in any marketing email or by contacting us at privacy@techsphere.net.au. We will action opt-out requests promptly and within the timeframes required by the Spam Act 2003 (Cth).

3. DISCLOSURE OF PERSONAL INFORMATION

3.1 Third-party service providers. We may disclose personal information to third-party service providers who assist us in delivering the Services. These providers are authorised to use personal information only to perform services on our behalf and are contractually bound to maintain appropriate confidentiality and security standards. Categories of recipients include:

- Cloud infrastructure and hosting providers (including data centres located in Australia and, where applicable, overseas regions such as Singapore and the United States).
- Payment processing and fraud-prevention providers.
- Customer relationship management (CRM) and helpdesk platforms.

- Identity verification and authentication services.
- Email, SMS, and communication delivery platforms.
- Analytics and performance monitoring tools (using de-identified or pseudonymous data where practicable).

3.2 Business partners. Where you have subscribed to Services facilitated through a KYKLO channel partner or reseller, we may share information necessary to administer your subscription with that partner. Any onward use by the partner is governed by the partner's own privacy policy.

3.3 Legal and regulatory disclosures. We may disclose personal information if required or authorised by Australian law, a court order, or a regulatory authority (including the Office of the Australian Information Commissioner (OAIC)), or where we reasonably believe disclosure is necessary to prevent or lessen a serious threat to life, health, or safety.

3.4 Business transfers. If Techsphere is involved in a merger, acquisition, asset sale, or restructure, personal information may be transferred to a successor entity. We will notify affected individuals as required by the Privacy Act 1988 (Cth).

3.5 No sale of personal information. We do not sell, rent, or trade personal information to third parties for their own marketing or commercial purposes.

4. CROSS-BORDER DISCLOSURE

Some of our service providers are located, or store data, outside Australia. Before disclosing personal information overseas, we take reasonable steps to ensure the recipient is subject to privacy obligations that are at least substantially similar to the APPs, or we obtain your consent to the disclosure.

Where personal information is transferred to a country that does not have equivalent privacy protections, we put in place contractual data processing agreements that impose APP-equivalent obligations on the overseas recipient.

By using our Services, you acknowledge that your personal information may be transferred to, stored in, or processed in countries outside Australia (including, but not limited to, the United States and Singapore). We remain responsible for ensuring such transfers comply with APP 8.

5. SECURITY OF PERSONAL INFORMATION

We implement appropriate technical and organisational measures to protect personal information from misuse, interference, loss, unauthorised access, modification, or disclosure. These measures include:

- Encryption of data in transit using TLS 1.2 or higher.
- Encryption of data at rest using AES-256 or equivalent standards.
- Role-based access controls and the principle of least privilege.
- Multi-factor authentication (MFA) for administrative access.
- Regular security assessments, penetration testing, and vulnerability scanning.
- Security incident response procedures, including mandatory breach notification obligations under the Notifiable Data Breaches (NDB) scheme in Part IIIC of the Privacy Act 1988 (Cth).

Despite these measures, no method of transmission over the internet or electronic storage is completely secure. You transmit information to us at your own risk. If you suspect a security incident, please contact us immediately at privacy@techsphere.net.au.

Notifiable Data Breaches. If we become aware of a data breach that is likely to result in serious harm to one or more individuals, we will notify the Office of the Australian Information Commissioner (OAIC) and affected individuals as required by the NDB scheme. We maintain an internal data breach response plan reviewed at least annually.

6. RETENTION OF PERSONAL INFORMATION

We retain personal information only for as long as is necessary for the purposes for which it was collected, or as required by applicable Australian law (including record-keeping obligations under the Corporations Act 2001 (Cth) and taxation legislation).

Upon termination or expiry of your subscription, we will retain your data for 30 days during which you may request an export. After that period, we will delete or irreversibly de-identify your personal information in accordance with our data retention schedule, unless we are required by law to retain it for a longer period.

When personal information is no longer required and is to be destroyed, we take reasonable steps to destroy or de-identify it securely.

7. ACCESS TO AND CORRECTION OF PERSONAL INFORMATION

7.1 Access. Under APP 12, you have the right to request access to the personal information we hold about you. To make an access request, please contact our Privacy Officer at privacy@techsphere.net.au with sufficient detail to identify the information sought. We will respond within 30 days of receiving your request. We will provide access free of charge unless the request is complex, in which case we may charge a reasonable fee (and will notify you of the fee in advance).

7.2 Correction. Under APP 13, if you believe that personal information we hold about you is inaccurate, out-of-date, incomplete, irrelevant, or misleading, you may request correction by contacting our Privacy Officer. We will take reasonable steps to correct the information and respond within 30 days. If we refuse to correct the information, we will provide written reasons and information about how to lodge a complaint.

7.3 Identity verification. We may require you to verify your identity before granting access or making corrections to protect against unauthorised disclosure.

7.4 Refusal of access. We may refuse access if an exception under APP 12.3 applies, for example where access would have an unreasonable impact on the privacy of other individuals, or where the information relates to anticipated legal proceedings.

8. CUSTOMER DATA AND B2B RELATIONSHIPS

Where Techsphere processes personal information on behalf of a business customer (for example, information about a customer's end-users, employees, or trade partners), the business customer acts as the primary controller and Techsphere acts as a processor. Techsphere will:

- Process that data only on the documented instructions of the business customer.
- Maintain appropriate technical and organisational safeguards.
- Assist the business customer in meeting its own obligations under the Privacy Act 1988 (Cth) and applicable state legislation.
- Delete or return data upon termination of the agreement, subject to legal retention obligations.

Business customers are responsible for ensuring they have a lawful basis for sharing personal information with Techsphere, including obtaining any necessary consents from their end-users.

9. COOKIES AND TRACKING TECHNOLOGIES

Our websites and platform use cookies and similar technologies to improve user experience, measure performance, and enable certain features. The types of cookies we use include:

- Essential cookies: required for core platform functionality (e.g., session management, authentication). These cannot be disabled.
- Analytics cookies: used to collect de-identified usage data to help us understand how visitors use our platform (e.g., Google Analytics with IP anonymisation enabled).
- Preference cookies: remember your settings and preferences to personalise your experience.
- Marketing cookies: used with your consent to deliver relevant advertising and measure campaign effectiveness.

You can manage cookie preferences through your browser settings or, where applicable, through our cookie consent banner. Please note that disabling certain cookies may affect platform functionality.

10. AUSTRALIAN PRIVACY PRINCIPLES — COMPLIANCE SUMMARY

The following table summarises how Techsphere complies with each of the 13 Australian Privacy Principles:

APP	Principle	How We Comply
APP 1	Open & transparent management	This Policy published at www.techsphere.net.au/privacy
APP 2	Anonymity & pseudonymity	Trial use available without identifying information where practicable
APP 3	Collection of solicited PI	Collect only information reasonably necessary for service delivery
APP 4	Dealing with unsolicited PI	Unsolicited PI destroyed or de-identified if not needed
APP 5	Notification of collection	Notified at point of collection or as soon as practicable
APP 6	Use & disclosure	Used only for primary purpose or with consent
APP 7	Direct marketing	Not used for direct marketing without consent; opt-out provided
APP 8	Cross-border disclosure	Reasonable steps taken to ensure overseas recipients comply with APPs
APP 9	Government identifiers	Government identifiers not adopted as own identifiers
APP 10	Quality of PI	Reasonable steps taken to ensure accuracy, completeness and currency
APP 11	Security of PI	Technical and organisational controls; destruction when no longer needed
APP 12	Access to PI	Access provided on request; response within 30 days
APP 13	Correction of PI	Correction on request; notation of dispute if correction refused

11. PRIVACY COMPLAINTS

If you have a concern or complaint about how we have handled your personal information, we encourage you to contact our Privacy Officer in the first instance. We will acknowledge receipt of your complaint within 5 business days and endeavour to resolve it within 30 days.

Privacy Officer Contact Details:

- Email: privacy@techsphere.net.au
- Mail: Privacy Officer, Techsphere Services Pty Ltd, Perth, Western Australia

If you are not satisfied with our response, you have the right to lodge a complaint with the Office of the Australian Information Commissioner (OAIC):

- Website: www.oaic.gov.au
- Phone: 1300 363 992
- Mail: GPO Box 5218, Sydney NSW 2001

12. UPDATES TO THIS POLICY

We may update this Privacy Policy from time to time to reflect changes in our practices, legal obligations, or regulatory requirements. We will publish the updated Policy at www.techsphere.net.au/privacy and update the Effective Date at the top of the document. Where changes are material, we will provide prominent notice (such as an in-platform notification or email) at least 30 days before the changes take effect.

Continued use of the Services after the updated Policy takes effect constitutes acceptance of the revised terms. If you do not agree with any changes, you should cease using the Services and contact us to arrange deletion of your personal information.

13. CONTACT US

For all privacy-related enquiries, access requests, correction requests, or complaints, please contact:

Entity	Techsphere Services Pty Ltd
ACN	690 376 642
ABN	14 690 376 642
Privacy Officer	privacy@techsphere.net.au
Website	www.techsphere.net.au/privacy
Jurisdiction	Perth, Western Australia, Australia

This Privacy Policy was prepared to comply with the Privacy Act 1988 (Cth), the Australian Privacy Principles, and all applicable Australian federal and state legislation as at the Effective Date above.