

Privacy policy

Australia

Last updated 08.02.24

This privacy statement describes how Sea-Flux Limited (Sea-Flux) deals with your personal information, and how we protect your privacy.

Your Privacy

Our commitment to your privacy

Sea-Flux Pty Ltd is an Australian company that is a related entity to Sea-Flux Limited (which is a New Zealand registered company that has developed software products primarily focused on providing the maritime industry with easy to use, compliance based applications that significantly enhance the safety of vessels and crew) – with both entities referred to in this Agreement as 'Sea-Flux', 'We' and 'Our' where the context provides.

The focus of Sea-Flux is on creating a paperless environment where every aspect of our customers team's work from the same page, with a single source of "truth". Communication, situational awareness and efficiency are some of the key elements that We have developed to create this environment.

This privacy statement outlines what personal information Sea-Flux collects, how we store, use and share it, and how you can access or correct your personal information. We are committed to protecting your privacy when you visit our websites, use our applications or contact us in any way.

We deal with your personal information in accordance with the Information Privacy Act 2009 (Qld) ('IPA') and this privacy statement.

We may occasionally update this privacy statement, to reflect changes to our practices, and will notify you when we do so. This statement was last updated on 8 February 2024.

This policy does not limit or exclude any of your rights under the IPA and other applicable laws.

Your Personal Information

Collecting your personal information

We collect personal information that we need in order to deliver our services to you. We collect personal information directly from you when you access our services or engage with us through our websites.

Information collected from you

If you make contact with us we are likely to collect and hold basic information, such as:

- Your name and contact details.
- Your address or region and housing information.
- Meeting notes from our conversations with you.
- Survey results and responses, when you participate in any of our surveys.
- Any correspondence with Sea-Flux
- Website activity.
- Transaction history.
- Size of your vessel and fleet
- Your industry
- Any other information we consider reasonably necessary to identify you and to conduct our business.

If you become a customer, there is additional information that we will hold, including:

- Name and positions and contact information of key members of your team
- Payment method which could include your credit card number (last 4 digits), name on your card, expiry date and card verification code (CVC) code* (only if you are paying by Stripe)
- Bank details (last 5 digits) and name of bank (if paying by GoCardless)

Sea-Flux and you confirm that by proposing to enter into any commercial arrangement with Sea-Flux, you agree that Sea-Flux's collection and holding of the above-mentioned information is reasonably necessary to identify you and to conduct Sea-Flux's business

In addition – within the Sea-Flux application there is the ability to hold personal information relating to crew for the purposes of crew management and safety. This information might include the following:

- Full name
- Position name
- Date of birth
- Inducted date
- Email
- Phone number
- Address
- Passport details
- Next of Kin names
- Next of kin relationship
- Next of Kin contact
- Bank account number
- ABN number
- Medical doctor
- Doctor contact
- Medical issues
- Current medication
- Previous injuries/surgeries
- Allergies
- Blood type
- Contract files
- Induction files

Along with any other information you choose to provide us.

Collectively, this is known as your "personal information".

Sea-Flux and you confirm that by entering into any commercial arrangement with Sea-Flux, you agree that Sea-Flux's collection and holding of the above-mentioned information is reasonably necessary to identify you and to conduct Sea-Flux's business, as well as comply with Sea-Flux's obligations to identify clients under both the IPA and at law generally.

Note: We do not store full credit card details. These are captured directly by Stripe, a Payment Card Industry Data Security Standard compliant payment provider, which will only deal with your personal information in accordance with the Privacy Act and its privacy policy.

Using your Personal Information

In order to deliver our services, we use your personal information in the ways set out below. If we need to use information in a way not outlined below, we will only do so if required or permitted by law or with your authorisation.

We use your personal information to:

- Provide you with any products and services you request or sign up for.
- Invoice you, or receive payment from you, for any of our services that require payment.
- Conduct market research surveys to improve the Sea-Flux application
- Target or customise our marketing and advertising.
- Tell you about our new products, services, promotions and campaigns. For example, if you are opted-in to email marketing communications we may email you to let you know about new content you may be interested in.

- Provide you with information about the operation and security of our websites.
- Contact you to advise you of changes to our terms and conditions, services or new products or promotions.
- Email communications
- Comply with any obligation that We have at law – including but not limited to Us providing information to any law enforcement agency upon their request

We do not sell or rent your personal information to any third party. However, we do share your personal information with trusted third parties that work on our behalf to deliver our services to you (such as for computing and storage purposes, for email correspondence and marketing purposes). You consent to such sharing of information at our reasonable discretion.

Third parties, some of which are based overseas, which we share your personal information with include:

- Google, our cloud hosting and computing infrastructure provider
- Monday.com and Google Drive, our CRM manger
- PandaDoc, our proposal and SLA generator
- Mailchimp, for marketing automation and email marketing.
- Xero our invoicing and payment provider.
- Stripe, our invoicing and payment provider.
- GoCardless, our invoicing and payment provider.
- Wise, our invoicing and payment provider.
- Zapier, automations provider

We record that this is not a complete list and we expressly reserve the right to share your information with third parties that we deem reasonably necessary and/or appropriate from time to time.

We do not authorise third parties to use or disclose your personal information except for the purpose of providing the service we request from them. All third parties, which we disclose your personal information to, are subject to obligations under the New Zealand Privacy Act 2020 to protect your information from unauthorised use or disclosure.

We do not share your personal information with any overseas providers which are not subject to the New Zealand Privacy Act. If we were to do so, we would obtain prior authorisation from you before we disclose it to any such third parties.

How we store and protect personal information

We store your personal information we collect from you in accordance with our obligations under the Privacy Act 2020 and take reasonable steps to ensure the security of your personal information. We use trusted third-party providers to store and process our data and ensure that our cloud-based platforms meet New Zealand privacy requirements. For more information on privacy practices for our key third party providers, see the following links:

Google Firestore

All four of these services provided have been certified under major privacy and security standards including:

ISO 27001, see: https://firebase.google.com/downloads/gdpr/NOVext2020_Firebase_ISO_27001.pdf

ISO 27017, see: <https://cloud.google.com/security/compliance/iso-27017>

ISO 27018, see: <https://cloud.google.com/security/compliance/iso-27018>

SOC 1, see: <https://www.aicpa.org/InterestAreas/FRC/AssuranceAdvisoryServices/Pages/AICPASOC1Report.aspx>

SOC 2, see: <https://www.aicpa.org/InterestAreas/FRC/AssuranceAdvisoryServices/Pages/AICPASOC2Report.aspx>

SOC 3, see https://firebase.google.com/downloads/gdpr/DEC2020_Firebase_SOC3_Report.pdf

For more information see: <https://firebase.google.com/support/privacy>

Monday.com

<https://monday.com/trustcenter/privacy>

Google Drive

<https://policies.google.com/privacy>

Mailchimp

<https://www.intuit.com/privacy/statement/>

Xero

<https://www.xero.com/au/legal/privacy/>

Stripe

<https://stripe.com/nz/privacy-center/legal>

Retention

We retain personal information only for as long as we need it in order to continue to provide you with our service(s), maintain the security of our websites or as required by law.

Security

We take all reasonable steps to ensure the personal information we collect is protected against loss, unauthorised access and disclosure or any other misuse. We have an information and communications technology policy in place to ensure staff manage and protect our data and devices. Access to our systems and platforms is controlled, through role-based access, and all access is logged and audited.

You can opt out of Google Analytics without affecting how you visit our site. For more information on opting out, please visit this page.

[https://support.google.com/analytics/answer/181881?](https://support.google.com/analytics/answer/181881?hl=en#:~:text=You%20can%20opt%2Dout%20of,Google%20Analytics%20about%20visit%20activity)

[hl=en#:~:text=You%20can%20opt%2Dout%20of,Google%20Analytics%20about%20visit%20activity.](https://support.google.com/analytics/answer/181881?hl=en#:~:text=You%20can%20opt%2Dout%20of,Google%20Analytics%20about%20visit%20activity)

<https://chrome.google.com/webstore/detail/google-analytics-opt-out/flloajicojecljbmefodhfapmkgghcbnh?hl=en>

Before you disclose any personal information to another site, we advise you to check its terms and conditions, including its privacy and security policies.

Your privacy rights

You have the right to request access to and correct any personal information we hold about you at any time.

Rights of access

You have the right to request a copy of the personal information we hold about you. When any such request is received, we will process your request as soon as possible and provide you with our decision on your request within 10 working days after your request. We will also take steps to verify your identity before providing you with any requested personal information. . You must comply with any request that We make in verifying your identity in order to provide you with the personal information that you have requested.

Asking us to stop using your information

You can ask us to stop using your information. However, if you ask us to stop using your information, we may not be able to provide you with all our services, such as emailing you newsletters and updates.

You can choose to opt out of having your email address provided to Google and Facebook for targeted advertising by emailing us with your request to safety@sea-flux.com

Complaints

Sea-Flux is committed to dealing quickly and appropriately with any privacy complaints.

If you are concerned this privacy statement may have been breached or your privacy has been compromised, please email us immediately safety@sea-flux.com or call customer services on 0223080209.

If we cannot adequately comply with the privacy principles outlined in the IPA, you have the right to complain to the Office of the Information Commissioner Queensland. For more information on privacy see oic.qld.gov.au.

Governing Law

This Agreement will be governed by and interpreted in accordance with the laws of Australia. For purposes of all claims brought under this Agreement, each of the Parties hereby irrevocably submits to the exclusive jurisdiction of the courts located in Australia.

Other information

You can find more information about our policies for protecting your personal information in our terms and conditions and within our security policy.

Updated	Changes made	Changes made by
08.02.24	Full review and minor edits including, update to third party software providers.	Tai