

PracPass Privacy Policy

Updated: 9th December, 2025

1. Privacy Statement

Clarity Data Solution is subject to the Privacy Act 1988 (Cth) (privacy laws). Clarity Data Solutions takes its responsibility to protect personal information seriously. This Privacy Policy sets out how we collect, hold, use and disclose information about individuals who interact with Clarity Data Solution and its products.

2. Purpose of this policy

Your privacy is important to Clarity Data Solutions. We treat all personal information collected by us in accordance with this Privacy Policy. We may vary this Policy from time to time.

3. Personal information collected by Clarity Data Solutions

During the course of conducting its operations, Clarity Data Solutions may collect personal information. Personal information is information or an opinion about an individual whose identity is apparent or can be reasonably ascertained from that information. Clarity Data Solutions collects a wide variety of personal information that is reasonably necessary for the purposes of conducting its business. This personal information includes information about individuals who:

- a) use Clarity Data Solutions products and services;
- b) conduct business or intend to conduct business with Clarity Data Solutions, including past, present and prospective investors and licensees;
- c) are business partners or suppliers, or part of such organisations, including external advisers and sub-consultants;
- d) seek employment with, have been employed by or are employed by Clarity Data Solutions;
- e) otherwise have some contact with Clarity Data Solutions.
- f) Personal information collected by Clarity Data Solutions includes:
- g) contact details;
- h) transactional information;
- i) information in relation to education and work history (for job applications or potential sub-consultants).
- j) log data, which may include information such as your computer's Internet Protocol ("IP") address, browser type, browser version, the pages of our Site that you visit, the time and date of your visit, the time spent on those pages and other statistics.
- k) This personal information is collected in a variety of ways, such as by mail, telephone, email, internet and intranet access, personal contact, by use of its products and through business activities and events.

4. Use of cookies

Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and stored on your computer's hard drive.

Like many sites, we use "cookies" to collect information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some features of Clarity Data Solutions products.

5. Purpose for which Clarity Data Solution, holds, uses and discloses personal information

We use an individual's personal information for the purposes for which it was collected, or a purpose related to the purpose for which it was collected, and otherwise for internal management and related purposes, which include:

- a) to provide a product or service you have requested;
- b) to provide technical support to you to use Clarity Data Solutions products and services;
- c) to promote and deliver products to organisations and individuals;
- d) Clarity Data Solutions automatically gathers information to monitor the use of its digital products and services. Most of the data we collected is aggregated, and this information is effectively anonymous to us.

Sometimes you will be asked to confirm that you agree to a particular activity, or the collection of your personal information for a specific purpose. Though Clarity Data Solutions usually collects aggregate data, we will make it clear to you if any information is being collected in a way that could personally identify you.

We may disclose personal information for the purposes for which it was collected, and for purposes related to the purposes for which it was collected, including:

- a) as permitted under privacy laws; and
- b) with the individual's consent or if the individual would reasonably expect that their information would be passed to the person to whom the personal information is disclosed.

6. Personal information held by Clarity Data Solutions

We take reasonable steps to protect all personal information which we hold (including your personal information) from misuse, interference, loss, unauthorised access, modification or disclosure.

We take reasonable steps to hold personal information securely in electronic or physical form.

These steps include secured encrypted servers, password protection for electronic files, securing paper files in locked cabinets and physical access restrictions.

When no longer required, personal information is destroyed in a secure manner or deleted.

We also take steps to ensure that the personal information we collect is accurate, up-to-date and complete. These steps include maintaining and updating personal information when we are advised by individuals that their personal information has changed.

7. Disclosure of personal information to external recipients

Clarity Data Solutions does not disclose personal information to outsourced information technology service providers, including cloud computing providers or data storage providers.

8. Disclosure of information via other platforms or services

Clarity Data Solutions may use Google Analytics to track your usage of the PracPass site. Google Analytics is a web analysis service provided by Google. Google utilises the data collected to track and examine the use of www.PracPass.com, to prepare reports on its activities and share them with other Google services. Google may use the data collected to contextualise and personalise the ads of its own advertising network. Personal data collected by Google includes Cookie and usage data, which is processed in the USA. Find Google's privacy policy here: <http://www.google.com.au/policies/privacy/>.

9. How to access personal information about you

If you are an individual who has provided personal information to Clarity Data Solutions, you may request access at any time to personal information we hold about you. You may request access by emailing the Privacy Officer at noreply@pracpass.com. Depending upon the personal information you seek to access, you may be asked:

- a) to put your request in writing to verify your identity;
- b) to provide further details to assist Clarity Data Solutions in responding to your request in a timely manner.

We will respond to a request for access to personal information within a reasonable period after the request is made.

You may also request a correction be made to personal information about you held by Clarity Data Solutions by contacting the Privacy Officer at noreply@pracpass.com

You may also request a copy of this Privacy Policy from the Privacy Officer.

10. How to complain about a breach of the privacy laws

If, at any time, you have a complaint against Clarity Data Solutions regarding the Privacy Policy, including a breach of the Privacy Laws, you may make a complaint to the Privacy Officer at noreply@pracpass.com. Complaints will be dealt with in confidence.

You may also make a complaint to the Office of the Australian Information Commissioner (OAIC) about the handling of your personal information. Information on making a privacy complaint can be found on their website at <http://www.oaic.gov.au/privacy/making-a-privacy-complaint>.