

GraceX Pty Ltd

ACN 679 155 072 | ABN 53 679 155 072

PARTNER PRIVACY NOTICE

GraceX Partner Program

Version 1.2 | 9 June 2026

1. About This Notice

This notice is provided by GraceX Pty Ltd (GraceX, we, us, our) to explain how we collect, use, and handle personal information in connection with the GraceX Partner Program.

GraceX is bound by the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs). This notice is issued under APP 5 and describes our practices for two categories of personal information collected through the program:

- Partner information: personal information about you as a participant in the GraceX Partner Program.
- Prospect contact information: personal information about named individuals at businesses you introduce to GraceX as potential customers.

This notice applies from the date you register as a GraceX Partner Program partner and governs all personal information collected in connection with the program.

2. About GraceX

GraceX operates a Microsoft 365-native platform that helps Australian businesses manage their obligations in relation to employee wellbeing. Our registered address is 81-83 Campbell Street, Surry Hills NSW 2010.

Our Privacy Officer can be contacted at:

Contact name	Roland Illyes
Email	roland@gracex.io
Postal address	81-83 Campbell Street, Surry Hills NSW 2010
Website	gracex.io

3. What Personal Information We Collect

3.1 Partner information

When you register as a GraceX Partner Program partner, we collect the following information about you:

- Your full name
- Your business name
- Your Australian Business Number (ABN)
- Your email address
- Your phone number

This information is collected directly from you via the Referral Registration Form (hosted on Microsoft Forms) at or before the time you register each referral.

3.2 Prospect contact information

When you register a referral, we collect the following information about the named contact at the business you are introducing to GraceX:

- The prospect contact's full name
- The prospect's business name
- The prospect contact's email address
- The prospect contact's phone number

This information is collected from you as the referring partner. By submitting a referral, you represent that:

- you have a pre-existing business relationship with the named prospect contact, or another lawful basis for disclosing their contact details to GraceX;
- before submitting the referral, you have informed the prospect contact that you intend to provide their contact details to GraceX so that GraceX can contact them about GraceX's products and services;
- any statement you make to the prospect contact about GraceX or the Partner Program is accurate and not misleading; and
- the information you provide is accurate, complete, and up to date to the best of your knowledge.

GraceX will use prospect contact information only for the purposes set out in section 4.2 of this notice. Where required, GraceX will take reasonable steps to notify the prospect contact of the collection of their personal information and direct them to the current version of this notice.

GraceX will not collect any sensitive information (as defined in the Privacy Act 1988 (Cth)) in connection with the Partner Program. If you inadvertently submit sensitive information, we will take reasonable steps to destroy or de-identify it.

4. Why We Collect and How We Use Personal Information

4.1 Partner information

We collect and use your personal information to:

- administer your participation in the GraceX Partner Program, including verifying your ABN and maintaining a record of your referrals;
- process and record commission payments, including issuing Recipient-Created Tax Invoices (RCTIs) where applicable;
- communicate with you about the program, including referral status updates, payment notifications, and program updates;
- manage the contractual relationship between you and GraceX under the Referral Partner Agreement; and
- meet our legal, regulatory, and tax obligations.

We will not use your personal information for unrelated marketing purposes without your separate consent.

4.2 Prospect contact information

We collect and use prospect contact information solely to:

- make direct contact with the named prospect to explore whether GraceX's products and services are a fit for their business; and
- record and track the referral against the Referral Window under the Referral Partner Agreement.

We will not use prospect contact information for any purpose unrelated to the administration of the referral or the sale of GraceX products and services to the prospect's business. We will not use prospect contact information for general marketing purposes without first obtaining the prospect's separate consent.

5. Disclosure of Personal Information

GraceX does not sell personal information.

Personal information collected through the Partner Program is held within GraceX's internal systems and is accessible only to GraceX personnel who require it to perform program administration functions.

We may disclose personal information:

- to our professional advisers, including legal and accounting advisers, where necessary to obtain professional advice and where those advisers are bound by confidentiality obligations;
- where required or authorised by Australian law, including to the Australian Taxation Office in relation to tax obligations, and to the Office of the Australian Information Commissioner in response to a regulatory inquiry;
- where you have given us your consent to a specific disclosure; and

- to third-party service providers engaged by GraceX to support the administration of the Partner Program, including providers of hosting, customer relationship management, communications, record-keeping, and related administrative services.

We will not disclose personal information to recipients located outside Australia without first taking reasonable steps to ensure the overseas recipient handles the information consistently with the APPs, or unless an exception under APP 8 applies.

At the date of this notice, GraceX does not have a settled CRM platform. Where a third-party CRM or similar service provider is adopted, this notice will be updated to identify the provider and, where personal information is likely to be disclosed overseas, the countries in which recipients are likely to be located, unless an exception under the Privacy Act 1988 (Cth) applies.

6. Storage and Security

Personal information collected through the Partner Program is stored within GraceX's Microsoft 365 environment, including Microsoft SharePoint and Microsoft Outlook. GraceX's Microsoft 365 tenancy is configured to store data within Australian data centres.

GraceX takes reasonable steps to protect personal information from misuse, interference, loss, and unauthorised access, modification, or disclosure. These steps include access controls limiting information to personnel with a need to access it, and use of Microsoft 365's built-in security and compliance features.

If GraceX becomes aware of a data breach that is likely to result in serious harm to an individual, we will comply with our notifiable data breach obligations under Part IIIC of the Privacy Act 1988 (Cth), including notifying the Office of the Australian Information Commissioner and affected individuals as soon as practicable.

7. Retention and Destruction

7.1 Partner information

We will retain your personal information for the duration of your Referral Partner Agreement with GraceX and afterwards for as long as reasonably necessary to comply with our legal, accounting, tax, and record-keeping obligations, resolve disputes, and enforce our rights, which is generally expected to be up to 7 years after termination. This period reflects our obligations to retain financial and tax records under the Income Tax Assessment Act 1997 (Cth) and related legislation.

Following expiry of the retention period, we will take reasonable steps to destroy or de-identify your personal information in accordance with APP 11.2.

7.2 Prospect contact information

We will retain prospect contact information for the duration of the Referral Window applicable to that prospect under the Referral Partner Agreement (currently 24 months from the date of registration).

If a Qualifying Conversion occurs within the Referral Window, the prospect's information may be retained for the period reasonably necessary to administer the resulting customer relationship, comply with legal obligations, maintain accurate business records, and calculate and verify any associated commission payments.

Where this occurs, GraceX will continue to handle that information in accordance with its then-current general privacy policy or customer-facing privacy notice, as applicable.

Where the Referral Window expires and no Qualifying Conversion has occurred, GraceX will take reasonable steps to destroy or de-identify the prospect's contact information within 30 days of the expiry date.

8. Your Rights: Access and Correction

Under the Privacy Act 1988 (Cth), you have the right to request access to personal information GraceX holds about you and to request correction of information that is inaccurate, out of date, incomplete, irrelevant, or misleading.

To make a request, contact our Privacy Officer using the contact details in section 2. We will respond to access requests within 30 days of receipt. We may need to verify your identity before providing access. We will not charge a fee for making an access or correction request, but we may charge a reasonable fee to cover the cost of providing access where the request is complex or requires significant effort.

In limited circumstances, we may decline to provide access to personal information. If we decline, we will tell you why in writing, subject to any applicable legal constraint on doing so, and provide information about how to complain if you are not satisfied with our decision.

9. Privacy Complaints

If you believe GraceX has handled your personal information in a way that does not comply with the Privacy Act 1988 (Cth) or the APPs, you may make a complaint by contacting our Privacy Officer at roland@gracex.io.

We will acknowledge your complaint within 5 business days and aim to resolve it within 30 days. We may need to seek further information from you to investigate your complaint.

If you are not satisfied with our response, you may escalate your complaint to the Office of the Australian Information Commissioner (OAIC):

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

10. Changes to This Notice

GraceX may update this notice from time to time to reflect changes to our information handling practices or legal obligations. The current version will be published at the URL provided in the Partner Program materials. We will notify active partners of material changes via email. Where a change materially affects how personal information is collected, used, disclosed, stored, or handled, GraceX will take reasonable steps to bring the updated notice to the attention of affected individuals before or at the time the change takes effect, where practicable.

The version number and date at the top of this notice identify the current version.

This notice is issued under the Privacy Act 1988 (Cth). It does not constitute legal advice. If you have questions about your own privacy obligations, you should seek independent legal advice.

GraceX Pty Ltd | ACN 679 155 072 | 81-83 Campbell Street, Surry Hills NSW 2010 | gracex.io