

## MODANO GLOBAL PRIVACY POLICY

*Last Updated: May 7<sup>th</sup> July 2021*

This notice applies to all websites that we own and operate and all services that we provide, including Modano products, and any other apps or services we may offer (e.g. training, education, or events), collectively known as the “Services”.

Our privacy policy (the “Privacy Policy”) explains the information we collect, how we use and share it, how to manage your privacy settings and your rights in connection with the Services. Please also read our [End User Licensing Agreement](#) (“EULA”) which sets out the terms governing the Services.

### Who is Modano?

Modano has developed financial modeling solutions that allow subscribers to gain clarity and control over their businesses, or in the case of advisors, the businesses they advise.

Modano is headquartered in Australia and our Services are provided to you by Modano Pty Ltd and all its associated entities.

Questions or comments about this Privacy Policy may be submitted:

- By email to [privacy@modano.com](mailto:privacy@modano.com)
- By writing to:

Data Protection Officer  
Modano Pty Ltd  
Level 14, 330 Collins Street  
Victoria, 3000, Australia

### Respecting your privacy and the law

The privacy of your personal information has always been important to us at Modano Pty Ltd. We are committed to respecting your right to privacy and protecting your personal information. We are bound by the National Privacy Principles in the Privacy Act 1988 (Commonwealth), as well as other applicable laws and codes affecting your personal information.

### We collect, use, share, and otherwise process information

Modano relies on several legal bases to collect, use, share, and otherwise process the information we have about you for the purposes described in this Privacy Policy, including:

- As necessary to provide the Services and fulfil our obligations in accordance with our EULA.
- Where you have consented to the processing, which you can revoke at any time.
- Where necessary to comply with a legal obligation, a court order, or to exercise and defend legal claims.

## What information do we collect?

When you visit our websites, use our Services, make an enquiry or communicate with us, we collect personal data. What we collect and the ways we collect it can be broadly categorized into the following:

### *Information you provide to us directly:*

- We collect basic account information such as your name, email address, username and password that helps secure and provide you with access to our Services.
- When you make a payment to subscribe to Modano, you may provide payment information. We use Payment Card Industry compliant third-party payment services and we do not store your credit card information.
- To help us to provide you with the best possible service, you can choose to provide us with your contact information, so we can better respond to your support requests and comments.

### *Information we collect automatically:*

- We collect information from your browser, computer, or mobile device, which provides us with technical information when you access or use the Services. This technical information includes device and network information, cookies, log files and analytics information.

### *Information we get from third parties:*

- We may also get information from other companies or third parties, such as when you sync a third-party account or service with Modano, such as Xero, MYOB, QBO, Sage, Google Analytics, or other systems.
- Modano allows you to sign up and log in to the Services using accounts you create with third-party products and services. If you access the Services with Third-Party Accounts, we will collect information that you have agreed to make available such as your name, email address, profile information and preferences with the applicable Third-Party Account. This information is collected by the Third-Party Account provider and is provided to Modano under their privacy policies.
- We may also collect personal data about you from other sources, such as publicly available materials or trusted third parties like our marketing and research partners. We use this information to supplement the data we already hold about you in order to better inform or improve our services, and to validate the personal data you provide.

If we don't collect your personal data, then we may be unable to provide you with all of our Services, and some features and functionality on our websites may not be available to you.

## How do we use your personal data?

We use your personal data for our legitimate business interests. When we use your data, we make sure that we understand and work to minimize its privacy impact – i.e. we limit the data to what is necessary, control access to the data, and where we can, aggregate or anonymize the data.

We use your data to allow you to operate our websites, provide you with any Services you've requested from us, and to manage our relationship with you.

We also use your personal data for other purposes, which may include the following:

### **To communicate with you**, which may include:

- Providing you with information or follow up that you have requested from us or information that we are required to send to you.
- Communicating any changes to our Services or security updates.
- Aiding with using our Services.
- Asking you to participate in our customer research (we may use a third party to assist with this).
- Deliver marketing communications (including in-product messaging).

### **To support you**, which may include:

- assisting with support issues related to our Services which may be by email, in-app support, or other means.

### **To enhance our Services**, which may include:

- tracking and monitoring your use of our websites and services so that we can continue to innovate.
- performing technical analysis of our websites and services to optimize your user experience and to improve the efficiency of our services.

### **To Protect you**, which may include:

- Detecting, preventing, investigating, or remediating any fraudulent or malicious activity
- Making sure that everyone is using our Services fairly and in accordance with our EULA.

### **To market our Services to you**, which may include:

- Sending you marketing communications or targeted advertising, either through our Services or through third parties
- Performing technical analysis of our websites and services to optimize your user experience and to improve the efficiency of our Services.

### **To analyze, aggregate and report**, which may include:

- Using the data we collect about users of our Services to produce aggregated and anonymized analytics and reports which we may share publicly or with third parties.

## How is personal data shared?

There may be times when we need to share your personal data with third parties. We will only disclose your personal data to:

### *Service Providers*

- We may share your information with third parties who provide services to Modano which contribute to or support the Services we provide to you.

### *Third Party Business via API or Other Integrations*

- When you choose to use third party apps, plug-ins, or websites that integrate with the Services, they may receive your information and content, including your personal information. Information collected by these third parties is subject to their terms and policies. Modano is not responsible for the terms or policies of third parties.

### *Affiliates and Acquirors of our Business or Assets*

- We may share your information with an actual or potential buyer (and its agents and advisers) in connection with an actual or proposed purchase, merger, or acquisition of any part of our business.

### *Government Agencies & Law enforcement bodies*

- We may preserve and share your information with government agencies and other third parties if we believe it is reasonably necessary to comply with law, regulation, legal process or governmental request; to enforce our agreements, policies and terms; to protect the security of our Services; to protect Modano, or the public from harm or illegal activities; or to respond to an emergency.

## International Transfers

When we share data, it may be transferred to, and processed in countries other than the country you live in. Our data is hosted with cloud service providers (AWS) whose servers are located in Australia and the United States of America.

Transfers of personal data to servers operated by cloud service providers outside the EEA will be protected by the appropriate safeguards, namely the standard data protection clauses adopted by the European Commission or a supervisory authority, which are incorporated into our agreements with such cloud service providers. You can find a copy of model contract clauses for transferring personal data outside the EEA at: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en).

For further information, please contact us via [privacy@modano.com](mailto:privacy@modano.com).

## Security

Security is a priority for us when it comes to your personal data. We will keep your information secure by taking appropriate technical and organizational measures against its unauthorized or unlawful processing and against its accidental loss, destruction, or damage.

We will do our best to protect your personal information, but we cannot guarantee the security of your information which is transmitted to our website, applications, or services or to other websites, applications and services via an internet or similar connection. If we have given you (or you have chosen) a password to access certain areas of our websites, applications or services please keep this password safe.

If you believe your account has or may have been compromised, please contact us at [privacy@modano.com](mailto:privacy@modano.com).

## Your Rights and Choices

Most of the data we collect and the purposes we use it for are necessary for us to operate and improve our Services. If you wish to opt out of any notifications related to your account, please contact [support@modano.com](mailto:support@modano.com). Alternatively, if you receive an email, you can unsubscribe using the link provided in the email.

*You also have rights to:*

- Correct, amend, or update profile or account information that is inaccurate at any time by adjusting that information in your account settings. If you need further assistance, please contact Modano at [support@modano.com](mailto:support@modano.com).
- Access, rectify, download, or erase your information, as well as the right to restrict and object to certain processing of your information.

Where we process your information based on our legitimate interests, or in the public interest, you can object to this processing in certain circumstances. In such cases, we will cease processing your information unless we have compelling legitimate grounds to continue processing or where it is needed for legal reasons.

Should you wish to raise a concern about our use of your information (and without prejudice to any other rights you may have), you have the right to do so with your local supervisory authority or by contacting [privacy@modano.com](mailto:privacy@modano.com).

## Retention of Personal Data

Modano keeps personal data for as long as necessary to provide our Services. We also keep personal data for other legitimate business purposes such as complying with applicable legal, tax or accounting obligations. The information we retain will be handled in accordance with this Privacy Policy.

Information about you that is no longer necessary and relevant to provide our Services may be anonymized and aggregated with other non-personal data to provide insights which are commercially valuable to Modano.

**Privacy Policy Information**

Modano Pty Ltd reserves the right to change this policy at any time, and any amended policy is effective upon posting to this Website. Modano Pty Ltd will make every effort to communicate any significant changes to you via email or notification via the subscription.

Unless indicated otherwise, this Privacy Policy does not apply to third party products or services or the practices of companies that we do not own or control, including other companies you might interact with on or through our Services.