

Cutting Edge Software

HYBRID SOFTWARE PTY LTD ACN 114 591 310

PRIVACY POLICY

Updated 30th April 2025

Privacy Policy

Updated 30th April 2025

This Privacy Policy explains what information we collect about Health Practitioners who use CESOFT, ('you' or 'your') and Patients, how we use the information we collect, how we share the information we collect, who we share the information with and how you can access and control your information.

Please read the following carefully to understand our practices regarding Personal Information and how we will treat it.

You consent to us collecting, storing, using, processing, modifying or disclosing your Personal Information in accordance with this Privacy Policy.

With regard to any Personal Information of Patients, it is your responsibility to obtain (and by using CESOFT you will be taken to have obtained) all necessary consents from those Patients:

- before you collect, store, use, process, modify or disclose their Personal Information to us; and
- to us collecting, storing, using, processing, modifying or disclosing their Personal Information in accordance with this Privacy Policy.

Definitions

In this Privacy Policy, the following definitions apply:

- **CESOFT** means the web-based medical billing application operated by us and any reference to 'CESOFT', 'us', 'we' or 'our' means Hybrid Software Pty Ltd ABN 22 114 591 310 trading as Cutting Edge Software;
- **GDPR** means the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament);
- **Health Practitioner** means a health practitioner who uses CESOFT;
- **Patient** means a patient of a Health Practitioner;
- **Personal Information** means any information relating to an identified or identifiable natural person and includes information about you and Patients.

What Personal Information do we collect?

We collect the following types of information about you and Patients:

Information that you provide to us directly

(A) Visiting our website

When you visit our website, we collect the following information (which includes Personal Information) from you:

- where you sign up to our newsletter or send us an enquiry, we collect your name and email address, as well as any other information you choose to supply.

(B) Subscribing up to our software

When you use CESOFT, we collect the following information (which includes Personal Information) from you:

- your name and email address;
- to the extent reasonably necessary for us to provide you with our products and services, the name, address, date of birth, next of kin, phone number, email address, bank account details, Medicare details, private health fund details, and details of professional services and fees rendered in respect of Patients; and
- your healthcare identifier number, name, address, phone number, practice name and email address.

Device information

When you use our software or visit our website, we automatically collect certain information through our use of device identifiers and other technologies. The information that we collect includes:

- your IP address;
- your operating system; and
- software performance data.

Our website uses cookies and other technologies to function effectively. These technologies record information about your use of our website, including:

- **Browser and device data**, such as IP address, device type, operating system and Internet browser type, screen resolution, operating system name and version, device manufacturer and model;
- **Usage data**, such as time spent on the website, pages visited, links clicked, language preferences and the pages that led or referred you to our website.

You can control or reset your cookies through your web browser and, if you choose to, you can refuse all cookies. However, some of the features of our website may not function properly if you disable the ability to accept cookies.

How do we use Personal Information?

We use the information we collect about you for the following purposes:

- **Providing our products and services:** We use the information that you provide to us to facilitate electronic claims from Health Practitioners to Medicare Australia, the Department of Veterans' Affairs and Australian Registered Health Benefits Organisations. We also use the information to allow you to access CESOFT and to bill you for such use of our software.
- **Communicating with you:** We use your contact information to send communications to you about important changes or updates to our products and services. When in line with the preferences you have shared with us, we also provide you with information or advertising relating to our products and services.
- **Performing data analytics:** We use the information about you to help us improve our products and services, including by generating analytics about how our users browse and interact with the Site and to assess the success of our marketing and advertising campaigns.
- **Customising our products and services for you:** We use information about you to make sure that our products and services are customised to your needs.

- **Keeping our software secure:** We use information about you to screen for potential risk and fraud, and to identify violations of this Privacy Policy or our Terms of Use.
- **Artificial Intelligence.** We (or our service providers) may use artificial intelligence (AI) technologies to enhance our products and services and improve your experience with us. AI may be used to extract and analyse data, automate processes and assist with practices and procedures. When processing Personal Information using AI, we ensure that those AI applications comply with the relevant data protection laws and regulations. Additionally, the AI function we utilise to process documents does not store, share or use data to train such AI tools.
- **Where required by law:** We will use or disclose your information where we reasonably believe that such action is necessary to: (a) comply with the law and the reasonable requests of law enforcement, regulators or a government authority; (b) to enforce our Terms of Use or to protect the security and integrity of our software; and/or (c) to exercise or protect the rights, property or personal safety of CESOFT or other persons.
- **Where you have given your consent:** We may seek your consent to use your information for a particular purpose. Where you give your consent for us to do this, we will use your information in accordance with that purpose. You can withdraw your consent to these uses at any time.

We rely on the following legal bases to process this information:

- where you have given your consent for us to use the Personal Information submitted to us or a Patient has given you their consent for you to supply us with the Personal Information;
- where the processing is necessary to perform a contract that we have with you, for example when you access our software;
- our legitimate business interests, such as improving and developing our products and services and marketing new features or products (but only where our legitimate interest is not overridden by your interest in protecting the Personal Information); and
- where it is necessary for compliance with our legal obligations.

You may at any time refuse to provide the Personal Information that we request. However, this may limit or prohibit our ability to provide our products and services to you. You may withdraw your consent for us to process Personal Information at any time by contacting us in accordance with our 'Contact us' section below.

Who do we disclose Personal Information to, and why?

Outside of authorised personnel employed by us, we only share Personal Information with third parties that meet the data privacy conditions described in this Privacy Policy. These third parties help us use Personal Information in the ways described above, and include:

- **Medicare Australia, the Department of Veterans' Affairs and Australian Registered Health Benefits Organisations.** We rely on the authority given to us under our Notice of Integration with the Australian Government Department of Human Services in order to share Personal Information with these entities;
- **Service providers.** We share Personal Information with a limited number of our service providers. These service providers provide services on our behalf, including payment processing and data extraction, processing and analysis;
- **Corporate transactions.** In the event that we enter into, or intend to enter into, a transaction that alters the structure of our business, such as a reorganisation, merger, sale, joint venture, assignment, transfer, change of control, or other disposition of all or any portion of our business,

assets or shares, we may share Personal Information with third parties for the purpose of facilitating and completing the transaction.

- **Compliance and harm prevention.** We share Personal Information if we believe it is necessary: (i) to comply with applicable law; (ii) to enforce our contractual rights; (iii) to protect the rights, privacy, safety and property of CESOFT, you or others; and (iv) to respond to requests from courts, law enforcement agencies, regulatory agencies and other public and government authorities.
- **Third Party Service Providers.** Personal Information that we collect may be disclosed to and processed by third party service providers based in Australia and in the European Union. We consider that the disclosure and processing of this Personal Information is necessary to pursue our legitimate business interests in a way that might reasonably be expected (e.g. extracting and processing data to generate an invoice) and which does not materially impact your rights, freedoms or interests.

We require that third party service providers based in the European Union:

- are subject to the GDPR (being laws that are similar to the Australian Privacy Principles);
- maintain secure communication and infrastructure hosted in the European Union in compliance with ISO27001 standards;
- act as the data 'processor' for us (where we are the data 'controller') (as those terms are defined in the GDPR); and
- provide us with sufficient guarantees and implement appropriate technical and organisational measures to secure Personal Information, only process Personal Information for specified purposes and to commit themselves to confidentiality.

Do we use Personal Information for marketing?

We will use your Personal Information to offer you our products and services that we believe may interest you, but we will not do so if you tell us not to.

Where you receive electronic marketing communications from us, you may opt out of receiving further marketing communications by following the opt-out instructions provided in the communication.

How to change or delete Personal Information?

Health Practitioners and Patients may also access, review, update, rectify or delete their Personal Information by contacting us. We will respond to all requests within 30 days and may request that you verify your identity before we make any changes to the Personal Information we hold. Please note that deleting your Personal Information may limit our ability to provide our services to you.

You can also stop receiving promotional email communications from us at any time by clicking on the "unsubscribe link" in the relevant communication.

We may limit or reject your request in certain cases, including without limitation where the burden or expense of providing access would be disproportionate to the risks to your privacy in the case in question, where the rights of other persons would be violated, as required by law or for governance purposes, or if we do not agree that the Personal Information requires correction. If we refuse a deletion or correction request, we will provide you with a written notice stating our reasons for the refusal. We may also seek to recover from you reasonable costs incurred for providing you with access to any of the Personal Information held by us.

If you need further assistance regarding your access and control of your Personal Information, please contact us.

How do we store and hold personal information?

We are committed to maintaining the confidentiality of the information that you provide to us and we take all reasonable precautions to protect Personal Information from unauthorised use or alteration.

We take reasonable steps to hold and protect the Personal Information submitted to us, both during transmission and once we receive it.

These processes and systems include the following:

- **Access Management.** The use of identity and access management technologies to control access to systems on which information is processed and stored.
- **Hosting.** Data is hosted and secured within ISO27001 compliant data centres.
- **Policies.** Requiring all employees to comply with internal information security policies and keep information secure.
- **Training.** Requiring all employees to complete training about information security.
- **Monitoring.** Monitoring and regularly reviewing our practices against our own policies and against applicable industry standards.

However, no method of transmission over the Internet using technology is 100% secure. Therefore, we cannot guarantee the absolute security of your information, or that our systems will be completely free from third-party interception or are incorruptible from viruses.

For how long do we retain data?

When you submit Personal Information to us, we will maintain this information for our records because we need this information to operate the accounts you have with us, to deliver our products and services to you and for the other purposes set out in the 'What Personal Information do we collect, and why?' section.

We will retain this information until we no longer need it for the purposes for which it was provided or as otherwise permitted by law or until you ask us to delete this information in accordance with our 'How to change or delete Personal Information' section above.

How will this Privacy Policy be updated?

We reserve the right to modify this Privacy Policy at any time in order to reflect, for example, changes to our practices or for other operational, legal or regulatory reasons. If we make material changes to this Privacy Policy you will be notified via email (if we have your contact information) or otherwise in some manner through our services that we deem reasonably likely to reach you.

Any modifications to this Privacy Policy will be effective upon our publication of the new terms and/or upon implementation of the new changes to our services (or as otherwise indicated at the time of publication). In all cases, your continued use of our services or software after the publication of any modified Privacy Policy indicates your acceptance of the terms of the modified Privacy Policy.

How can we be contacted?

Thank you for taking the time to read this. For further information about our Privacy Policy or practices, or to access or correct your personal data, or make a complaint, please contact us at:

Phone: 1300 237 638

CUTTING EDGE SOFTWARE
PRIVACY POLICY

Email: support@cesoft.com.au

Post: PO BOX 901 Mount Eliza, Victoria, 3930

If you believe we have breached the Australian Privacy Principles, please lodge a complaint directly to us and we will respond within 30 days.

If you remain unsatisfied with the way in which we have handled a privacy issue, you may approach an independent advisor or contact the Office of the Australian Information Commissioner (OAIC) (www.oaic.gov.au) for guidance on alternative courses of action that may be available.