ADVOC8

1/60 Martin Place
Sydney NSW 2000

Privacy Policy

Last updated: March 2026

Advoc8 GRM Pty Ltd ACN 613 405 262 ("Advoc8", "we", "us" or "our") is committed to protecting the privacy of all individuals whose personal information we handle. This Privacy Policy explains how we collect, hold, use, and disclose personal information, and how individuals can exercise their privacy rights.

This Privacy Policy applies to all personal information we handle in connection with our products, services, website and business operations. By accessing or using our website or services, you acknowledge that you have read and understood this Privacy Policy.

We handle three distinct categories of personal information, each addressed in this Privacy Policy:

- personal information about our customers, users and website visitors;
- personal information about political and government stakeholders that we collect from publicly available sources and include in our platform; and
- personal information entered into our platform by our customers about their stakeholder relationships and activities.

Australian Privacy Act 1988 (Cth)

Advoc8 handles personal information in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs) contained in that Act. This Privacy Policy sets out how we comply with our obligations under the APPs.

1. About us and this policy

Advoc8 provides software for government relations and public policy professionals. Our platform provides political monitoring, stakeholder intelligence and relationship management tools for corporate public sector customers across Australia.

Our primary website is advoc8.co. You should also review our terms and conditions, which are available on our website.

Our Data Privacy Officer is Harry Curotta, who can be contacted at dpo@advoc8.co.

2. Personal information we collect

2.1 Customer and user information

When you or your organisation engages with us, we may collect personal information including:

- names and job titles;
- work email addresses and phone numbers;
- organisation name and billing details;

- username, password and account preferences;
- payment and invoicing information; and
- platform usage data, including log data, session information and feature usage.

2.2 Stakeholder directory information

Our platform includes a structured directory of political and government stakeholders. We collect and maintain information about individuals in public-facing government and political roles, including members of parliament, ministers, advisors, senior public servants and departmental contacts.

The types of information we hold about stakeholders include:

- name, title and current role;
- office contact details;
- electorate or portfolio information;
- career history and role changes;
- publicly available political affiliations; and
- public statements sourced from monitored content (see section 4.3 below).

We collect this information from publicly available sources or where provided by the stakeholder only, including:

- government and parliamentary websites;
- official departmental directories and contact pages;
- Hansard and committee transcripts;
- public media releases and inquiry submissions; and
- publicly available LinkedIn profiles.

Although much of this information is publicly available, we recognise that stakeholders have privacy interests and we treat this information with care. Stakeholders can contact us at any time to review, correct or request removal of their information - see section 9 below.

2.3 Customer-entered data

Our platform allows customers to create and store their own internal records relating to their stakeholder engagement. This may include:

- records of meetings and interactions;
- internal notes and commentary about stakeholders;
- uploaded documents and correspondence; and
- custom contact records and stakeholder lists.

Customers are responsible for ensuring that any personal information they enter into our platform is collected and handled in accordance with applicable laws. We ask our customers to ensure they have appropriate authority to add third-party personal information to our platform.By entering personal information is consistent with the purpose for which it was collected.

2.4 Website and marketing data

When you visit our website, we may automatically collect certain technical information, including:

- browser type and operating system;
- IP address and approximate location;
- pages visited and time spent on our website;
- referring website addresses; and
- interaction data collected through cookies and similar technologies.

See section 8 (Cookies and tracking technologies) for further information.

3. How we collect personal information

We collect personal information in the following ways:

- directly from you when you create an account, subscribe to our services, contact us, or complete a form on our website;
- from your organisation, where your employer or a subscriber provides your details in connection with a subscription to our services;
- from publicly available sources, in the course of building and maintaining our stakeholder directory (see section 2.2);
- from customers who enter information about stakeholders into our platform (see section 2.3);
- automatically through your use of our website and platform, including through cookies and analytics tools (see section 8); and
- from third parties such as data providers, where we combine external information with information we already hold, to the extent permitted by law.

If you provide us with personal information about another person, you must ensure that person is aware of this Privacy Policy and that you have any authority necessary to disclose their information to us.Where customers provide us with personal information about another individual in connection with a support request or other interaction with Advoc8, they confirm they have authority to do so.

4. How we use personal information

4.1 Customer and user information

We use personal information about our customers and users to:

- provide, operate and improve our platform and services;
- manage your account and subscription;
- process payments and issue invoices;
- respond to enquiries, requests and support tickets;
- send you service-related communications, including security alerts and policy updates;
- conduct research and analytics to improve the performance and functionality of our platform;
- detect and prevent fraud, security incidents and misuse of our services; and
- comply with our legal obligations.

With your consent, or where otherwise permitted by law, we may also use your contact information to:

- send you information about new features, products and services; and
- invite you to participate in surveys, research or events.

You can opt out of marketing communications at any time by clicking the unsubscribe link in any marketing email, or by contacting us at dpo@advoc8.co. Removal from marketing lists may take several business days.

4.2 Use of stakeholder information

We use information about political and government stakeholders to:

- operate and populate our stakeholder directory;
- provide our customers with alerts and updates about changes to stakeholder roles, contact details and portfolio responsibilities;
- support our customers' stakeholder engagement management and government affairs activities; and
- deliver political monitoring services, including tracking parliamentary proceedings, committee inquiries and policy developments.

4.3 AI-assisted features

Our platform includes AI-assisted features that generate summaries of publicly available content, including parliamentary speeches, Hansard transcripts, committee proceedings and government media releases. These features process content that may contain personal information about public officials and government representatives.

> **About our AI features**
> Our AI-assisted summaries are generated from publicly available government content. The AI processes this content to extract key points and themes. We do not use AI to make automated decisions about individuals, and AI-generated summaries are not used to profile or score individuals in ways that have legal or significant effects. Where AI processing involves personal information, we take steps to ensure that processing is limited to what is necessary for the purpose of providing the service.

4.4 Customer-entered data

We hold and process customer-entered data solely on behalf of and at the direction of the relevant customer. We do not use or disclose customer-entered data for our own purposes, except where necessary to operate, maintain and secure our platform, or as required by law.

4.5 General

We may also collect, hold, use and disclose personal information:

- to the extent required or authorised by law, including in response to legal process or a request from a law enforcement authority;
- to protect the rights, property or safety of Advoc8, our customers or third parties; and
- in connection with a sale, merger or acquisition of all or part of our business, in which case we will notify affected individuals as required by law.

We may monitor and record our communications with you, including emails and telephone conversations, for training, quality assurance and compliance purposes.

5. Disclosure of personal information

5.1 Service providers and third parties

We may disclose personal information to third parties who assist us in operating our business and delivering our services, including:

- cloud hosting and infrastructure providers;
- payment processors and financial services providers;
- analytics and marketing service providers;
- customer support and communication tools; and
- professional advisers, including lawyers and accountants.

We take steps to ensure that third parties who receive personal information from us handle it in accordance with applicable privacy laws and, where appropriate, we enter into data processing agreements or equivalent contractual protections.

5.2 Hosting and infrastructure

Our platform is hosted on Amazon Web Services (AWS) infrastructure. All customer data is stored in Australia. Data is encrypted in transit using industry-standard protocols.

5.3 International transfers

Some of our service providers are located or operate infrastructure outside Australia, which may mean that personal information we hold is transferred to or accessed from overseas. Where this occurs, we take steps to ensure appropriate protections are in place, including through contractual arrangements that require overseas recipients to handle personal information in a manner consistent with the APPs.

You may contact us at dpo@advoc8.co for further information about our international data transfer arrangements.

5.4 Legal requirements and business transfers

We may disclose personal information:

- where required or permitted by law, including in response to a court order, subpoena or lawful request from a regulatory authority;
- to protect our rights or property, or the safety of our customers or others; and
- in connection with a sale, merger, acquisition or restructure of our business. In that event, we will notify affected individuals as required by law.

6. Data retention

We retain personal information for as long as it is needed for the purpose for which it was collected, or as required by law. In general:

Customer account data	Retained for the duration of the subscription and for seven (7) years after the end of the subscription period, unless a shorter period is required by law or agreed in the relevant contract.
Stakeholder directory data	Maintained on an ongoing basis and reviewed regularly for accuracy. Removed or updated when we become aware that a stakeholder has left a public role, or upon receipt of a valid removal request.
Customer-entered data	Retained in accordance with the customer's instructions or contract. Customers may delete their own data at any time through the platform.
Marketing and communications data	Retained until you opt out of marketing, or for seven (7) years from the date of last interaction, whichever is earlier.
Suppression logs	Retained indefinitely to prevent personal information from being re-added to our platform following a removal request.

When personal information is no longer required, we will take reasonable steps to destroy or de-identify it securely.

7. Security of personal information

We take reasonable steps to protect personal information from misuse, interference, loss, and unauthorised access, modification or disclosure. Our security measures include:

- cloud hosting on AWS infrastructure with data stored in Australia;
- encryption of data in transit using industry-standard SSL/TLS protocols;
- role-based access controls limiting access to personal information to authorised personnel;
- audit logging of access to personal information;
- regular access reviews to ensure access privileges remain appropriate; and
- staff training in data protection obligations and our internal data policies.

We hold ISO 27001 certification, which reflects our commitment to information security management.

7.1 Notifiable data breaches

We are subject to the Notifiable Data Breaches (NDB) scheme under the Privacy Act 1988 (Cth). If we become aware of a data breach that is likely to result in serious harm to any affected individual, we will:

- take immediate steps to contain the breach and assess the risk of harm;
- notify the Office of the Australian Information Commissioner (OAIC) as soon as practicable; and
- notify affected individuals as required by law, including details of the breach and the steps they can take to protect themselves.

If you become aware of any actual or suspected unauthorised access to, or disclosure of, your personal information, please contact us immediately at dpo@advoc8.co.

Notwithstanding the security measures we implement, no data transmission over the internet or electronic storage is completely secure. We cannot guarantee absolute security of personal information.

8. Cookies and tracking technologies

8.1 What we use

We use cookies and similar tracking technologies on our website to collect information about your visit, improve your experience, and support our marketing activities. We currently use the following tracking tools:

Google Analytics	Collects anonymised data about website traffic and usage patterns, including browser type, pages visited, session duration and referring sources. This helps us understand how visitors use our website.
Microsoft Clarity	Records anonymised session data including mouse movements, clicks and scrolling behaviour to help us improve website usability.
Google Ads	Enables remarketing, which allows us to show targeted advertisements to previous website visitors on other websites across the Google Display Network.
LinkedIn Advertising	Enables us to target advertising to relevant professional audiences on LinkedIn and to measure campaign performance.
Email marketing tools	We use email marketing platforms to send newsletters, product updates and promotional communications. These tools may track email opens and link clicks.
CRM integrations	Our CRM system may receive data about your interactions with our website and marketing materials to support sales and customer success activities.

8.2 Your choices

Most web browsers are set to accept cookies by default. You can adjust your browser settings to refuse cookies or to alert you when cookies are being sent. Please note that disabling cookies may affect the functionality of some parts of our website and platform.

For interest-based advertising, you can opt out of targeted advertising by:

- visiting the Google Ads Settings page at https://www.google.com/settings/ads;
- visiting the LinkedIn Ads opt-out page in your LinkedIn account settings;
- visiting the Network Advertising Initiative opt-out page at http://optout.networkadvertising.org; or
- using the AdChoices opt-out tool.

We may update the tracking tools we use from time to time. We will update this section of our Privacy Policy to reflect any material changes.

9. Access, correction and removal

9.1 Customers and users

You have the right to access and correct personal information we hold about you, subject to exceptions permitted by law. To make an access or correction request, please contact us at dpo@advoc8.co. We will respond to your request within 30 days.

We may decline to provide access in certain circumstances permitted by the Privacy Act 1988 (Cth), including where providing access would unreasonably impact the privacy of another person or where a request is frivolous. If we decline a request, we will explain why in writing.

We will not charge a fee for making an access request. We reserve the right to charge a reasonable fee to cover the cost of producing and providing access to the requested information.

9.2 Stakeholders

Individuals whose information appears in our stakeholder directory may contact us at dpo@advoc8.co at any time to:

- review the personal information we hold about them;
- request correction of inaccurate, outdated or incomplete information; or
- request removal of their information from our platform.

Where we receive a request to remove a stakeholder's information, we will make that information inaccessible to platform users within 30 days of receiving the request. To prevent the information from being re-added in future, we retain a suppression log containing the individual's name and the fact of their removal request. This log is not visible to our customers.

Where a stakeholder requests deletion of all of their personal information, we will delete their details from our database and retain only the minimum information necessary in our suppression log to ensure their information is not re-added.

9.3 Customer-entered data

Customers may access, correct and delete personal information they have entered into our platform directly through the platform at any time. For assistance with data access or deletion, customers may also contact us at dpo@advoc8.co.

10. Privacy complaints

If you have a concern or complaint about how we have handled your personal information, please contact our Data Privacy Officer in the first instance:

Name	Harry Curotta
Email	dpo@advoc8.co
Address	Advoc8 GRM Pty Ltd, 1/60 Martin Place, Sydney NSW 2000

We will acknowledge receipt of your complaint within 5 business days and aim to resolve it within 30 days. If we require additional time, we will notify you.

If we are unable to resolve your complaint to your satisfaction, or if you are otherwise dissatisfied with our response, you may lodge a complaint with the Office of the Australian Information Commissioner (OAIC):

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

11. Changes to this Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our business, our services, applicable law, or best practice. When we make material changes, we will update the "Last updated" date at the top of this policy and, where appropriate, notify you by email or by a notice on our website.

We encourage you to review this Privacy Policy periodically. Continued use of our website or services after any update constitutes acceptance of the updated policy.

12. Contact us

For any questions, concerns or requests relating to this Privacy Policy or our handling of personal information, please contact:

Data Privacy Officer	Harry Curotta
Email	dpo@advoc8.co
Address	Advoc8 GRM Pty Ltd, 1/60 Martin Place, Sydney NSW 2000
Phone	+61 (02) 9030 0353