

Smarter Drafter (Global): Privacy Policy: Published 10th April 2026

Tensis Group Pty Ltd (ABN 16 163 715 428) trading as Smarter Drafter (“we”, “us”, “our”) is committed to protecting your privacy.

This Privacy Policy explains how we collect, use, store, and disclose personal information when you use our website and services.

This policy applies globally, including to users in Australia, the United Kingdom, the European Union, the United States, and other jurisdictions where we operate.

If you have any questions, contact us at: team@smarterdrafter.com.au

1 What is “personal data”?

“Personal information” (or “personal data”) means information that identifies, or could reasonably identify, an individual.

This may include:

- name and contact details (email, phone, address)
- billing and payment information
- account and login details
- usage data (including interaction with our website or platform)
- device and technical information (IP address, browser type)
- any information submitted through our platform by you or your organisation

2 Our role: Controller vs Processor

When you interact with our website, we act as a data controller and determine how your personal information is handled.

When we provide our products and services to customers, we may process personal information on behalf of those customers. In these circumstances, we act as a data processor, and process personal information only in accordance with our customer’s instructions and applicable agreements.

3 How we use your personal data

We collect personal information:

Directly

- when you contact us, request a demo, or sign up for updates
- when you use our website or services
- when you provide information through forms, email, or support interactions

Indirectly

- where your organisation provides your information to us as part of using our services

Automatically

- through cookies, logs, analytics tools, and similar technologies

4 How we use personal information

We use personal information to:

- provide and deliver our products and services
- generate and manage documents and workflows
- administer accounts, billing, and payments
- provide customer support
- improve and develop our products and services
- analyse usage and performance
- communicate with you, including marketing (you can opt out)
- detect and prevent fraud, misuse, or security issues
- comply with legal obligations

Where appropriate, we may also use data to improve our systems, including training and refining automation and AI-assisted functionality.

5 Legal basis for processing (EU/UK)

If you are located in the European Union or United Kingdom, we process personal data on the following legal bases:

- performance of a contract
- legitimate interests (including operating and improving our services)
- compliance with legal obligations
- your consent (where required)

6 Cookies and tracking

We use cookies and similar technologies to:

- improve website performance and usability
- analyse traffic and usage
- support marketing and remarketing activities

You can control cookies through your browser settings.

7 Disclosure of personal information

We may disclose personal information to trusted third parties, including:

- cloud hosting providers (e.g. AWS, Microsoft Azure)
- analytics and CRM platforms
- payment processors (e.g. Stripe)
- professional advisers (legal, accounting, compliance)
- customer support and service providers
- marketing and research partners
- regulatory authorities where required
- potential acquirers or investors in connection with a transaction

All third parties are required to handle personal information in accordance with applicable privacy laws and contractual obligations.

8 International data transfers

Your personal information may be transferred to and processed in countries outside your jurisdiction, including Australia, the United States, the United Kingdom, and the European Union.

Where this occurs, we take reasonable steps to ensure appropriate safeguards are in place, including:

- contractual protections (such as Standard Contractual Clauses)
- working with providers in jurisdictions with recognised adequacy frameworks
- ensuring compliance with applicable data protection laws

9 Data Retention

We retain personal information only for as long as necessary to:

- provide our services
- fulfil the purposes outlined in this policy
- comply with legal obligations
- resolve disputes and enforce agreements

When no longer required, personal information is securely deleted or anonymised.

10 Security of personal information

We implement appropriate technical and organisational measures to protect personal information, including:

- access controls and authentication measures
- secure data storage
- encryption where appropriate
- monitoring and security controls

While we take reasonable steps to protect personal information, no system is completely secure.

11 Your privacy rights

Your rights depend on your location.

United Kingdom / European Union

You may have the right to:

- access your personal data
- correct inaccurate data
- request deletion
- restrict or object to processing
- request data portability
- withdraw consent
- lodge a complaint with a supervisory authority

California (USA)

Under the California Consumer Privacy Act (CCPA), you may have the right to:

- request access to your personal information
- request deletion of your personal information
- request correction of inaccurate information

We do not sell personal information as defined under the CCPA.

Australia

You have rights under the Privacy Act 1988 (Cth), including:

- the right to access your personal information
- the right to request correction

12 Third-party Websites

Our website may contain links to third-party websites. We are not responsible for the privacy practices of those websites.

13 Payment processing

We use third-party payment providers (such as Stripe) to process payments securely. We do not store full payment card details. Payment providers manage payment information in accordance with their own privacy policies.

14 Changes to this Privacy Policy

We may update this Privacy Policy from time to time.

Updates will be posted on our website and, where appropriate, notified to you.

15 Contact us

If you have any questions, requests, or complaints regarding this Privacy Policy or your personal information, contact us: team@smarterdrafter.com.au

For more information about your data protection rights, you may also contact the UK Information Commissioner's Office: <https://ico.org.uk/>

16 Additional terms for customers

If you use our products and services under a commercial agreement, additional data protection and privacy obligations apply under our App Usage Terms and any associated agreements.

Where we process personal information on behalf of customers, we act as a data processor and handle such information in accordance with those terms and the documented instructions of the customer.