

# S3 CUBED PTY LTD PRIVACY POLICY

Effective Date: 1 January 2026



## 1. Introduction

S3 Cubed Pty Ltd (ACN: 692 283 275, ABN: 78 692 283 275), with its registered office at 167 Fullarton Road, Dulwich, South Australia 5065 ("S3", "we", "us", or "our"), is committed to protecting the privacy of personal information in accordance with the Australian Privacy Principles (APPs) under the Privacy Act 1988 (Cth). This Privacy Policy explains how we collect, use, disclose, store, and protect personal information in the course of our business operations.

We provide services to businesses focused on saving costs through procurement mastery, streamlining processes with custom technology, and scaling growth via ongoing support—all on a risk-free, success-fee basis. This policy applies to personal information we handle in connection with these services, delivered solely by our Australian entity, even when serving international clients.

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not, and whether recorded in a material form or not.

If you have any questions about this Privacy Policy, please contact us at our registered address.

## 2. Collection of Personal Information

We collect personal information only when necessary for our business functions and activities, specifically during potential or actual client engagements. We do not collect personal information through our website ([s3cubed.com.au](https://s3cubed.com.au)) or other public channels unless it is provided directly in the context of an engagement.

### Types of Personal Information We Collect

The personal information we may collect includes:

- Contact details, such as names, job titles, email addresses, phone numbers, and business addresses of client representatives or authorised persons.
- Business-related identifiers, such as company names, registered offices, VAT numbers, tax codes, and registration details in company registers.
- Any personal information contained in documents provided by clients during engagements, such as tax/accounting records, contractual documents, or other materials relevant to cost reviews and optimizations (e.g., names of individuals in contracts or operational records).

We do not collect sensitive information (e.g., health, racial, or political details) unless it is inadvertently included in client-provided documents and is necessary for our services. If sensitive information is provided, we will handle it with additional care and only for the purpose it was collected.

## **How We Collect Personal Information**

We collect personal information directly from you or your organization during engagements, such as:

- Through emails, phone calls, meetings, or other communications when discussing or entering into assignments.
- From documents and data shared by you for the purpose of conducting cost analyses, reviews, or negotiations (e.g., baseline models, findings reports).

We do not use automated collection methods like cookies or trackers on our website, nor do we collect information from third parties unless provided by you.

## **3. Use of Personal Information**

We use personal information solely for the primary purposes for which it was collected:

- Providing our core services, including cost impact engagements, procurement audits, contract negotiations, process streamlining, custom technology development, and scaling support (e.g., quarterly meetings).
- Internal operations, such as administering client relationships, billing, compliance with legal obligations, and managing our services.

We do not use personal information for secondary purposes without your consent, nor do we engage in automated decision-making or profiling.

## **4. Disclosure of Personal Information**

We do not share personal information with any third parties, except as necessary for our services or as required by law.

In the course of engagements, we may disclose limited personal information (e.g., contact details or relevant document excerpts) to key suppliers during negotiations to propose operational solutions or better conditions, as outlined in our assignment agreements. Such disclosures are made only on a need-to-know basis and in conjunction with or on behalf of the client.

We may also disclose personal information if required by law, such as to government authorities or in response to a court order.

## **5. International Transfers**

We serve international clients but operate solely from our Australian entity. Personal information may be transferred internationally in limited circumstances:

- To key suppliers located outside Australia during negotiations, where necessary for service delivery. We ensure such transfers comply with APP 8 by taking reasonable steps to protect the information, such as through contractual obligations.
- For storage and processing via our Microsoft technology stack, which may involve servers located outside Australia (e.g., in data centers managed by Microsoft). Microsoft adheres to international data protection standards, and we rely on their safeguards to protect the information.

## 6. Storage and Security

We store all personal information securely in our Microsoft technology stack, which is cloud-based and may be hosted internationally.

We implement best practices for security, including encryption, access controls, and cybersecurity measures provided by Microsoft to protect against unauthorized access, disclosure, alteration, or destruction.

Personal information is retained indefinitely on our cloud systems for as long as it is needed for our business purposes, legal obligations, or to resolve disputes, unless you request deletion (subject to any legal requirements).

## 7. Access, Correction, and Your Rights

Under the APPs, you have rights to access and correct your personal information. We do not have a formal process in place, but you may request access, correction, or deletion by contacting us in writing at our registered address. We will respond to such requests within a reasonable time, typically 30 days, and provide access free of charge unless the request is complex or repetitive.

If we refuse access or correction, we will provide reasons. We do not handle personal information of children under 18.

We do not send marketing communications, so there are no opt-out requirements.

## 8. Changes to This Policy

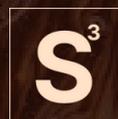
We may update this Privacy Policy from time to time to reflect changes in our practices or legal requirements. Updated versions will be posted on our website ([s3cubed.com.au](http://s3cubed.com.au)). We will notify you of material changes only if you request such notification.

## 9. Complaints

If you believe we have breached the APPs or mishandled your personal information, please contact us in writing at our registered address. We will investigate and respond within 30 days. If unsatisfied, you may complain to the Office of the Australian Information Commissioner (OAIC) at [www.oaic.gov.au](http://www.oaic.gov.au).

## 10. Governing Law

This Privacy Policy is governed by the laws of South Australia, Australia.



**Hendrik Snyman & Samuele Cavallaro**

S<sup>3</sup> - Save, Streamline, Scale

UNLOCK YOUR COMPANY'S TOMORROW

Visit us at [s3cubed.com.au](http://s3cubed.com.au)