

Privacy Policy – receipting.com

Effective Date: 27 November 2025

Version: 1.3

receipting.com is owned and operated by **Managed Functions Pty Ltd** (ABN 44 627 195 135) of Level 5, 580 George Street, Sydney NSW 2000, Australia.

We are the data controller (and in some cases data processor) for the personal information described in this policy.

One-sentence summary: We collect only the financial and account data necessary to reconcile your receipts automatically. We never sell your data and never use it to train shared AI models.

1. Purpose

This Privacy Policy explains how receipting.com ("Service", "we", "us", "our") collects, uses, stores, and discloses personal information in accordance with:

- The Australian Privacy Principles (APPs) under the Privacy Act 1988 (Cth)
- The General Data Protection Regulation (GDPR) for EU/EEA data subjects
- The UK GDPR (where applicable)

This policy applies only to personal information and does not apply to anonymised or aggregated data that cannot identify an individual.

2. Roles: Data Controller and Data Processor

- **Customer Data** (bank statements, remittances, invoices): We act as **Data Processor**, processing solely on Customer instructions.
 - **User Account Data** (login credentials, billing, usage logs, support): We act as **Data Controller**, determining purposes and means of processing.
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3. Applicability

This policy applies to:

- **Customer Personnel** (employees of customer organisations)

- **Individuals identified in financial documents** processed by the Service
- **Users who register accounts or access the platform**

Minors

The Service is not intended for individuals under 16. If such data is discovered, it will be deleted promptly.

4. Information We Collect

4.1 Account Information

- Full name, job title, employer
- Business email and phone
- User credentials (hashed or encrypted)
- Billing details and correspondence records

4.2 Financial Information (Customer Data)

- Bank statements, remittance advice, invoice data
- Transaction history and allocations
- Account names and references

4.3 Technical Information

- IP address, browser/device details
- Access timestamps and audit logs

4.4 Usage Data

- Feature usage patterns and activity logs
 - Error reports and processing results
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5. How We Collect Information

- **Account registration**
 - **Processing documents** (uploaded or retrieved via API)
 - **Accounting/banking integrations** (Xero, QuickBooks, etc.)
 - **Customer communications**
 - **Automated processing** via AI-assisted extraction
 - **System logs and audit trails**
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6. How We Use Personal Information

We only use personal information for purposes directly related to Service delivery unless explicit consent is provided.

6.1 Contract Performance

- Extracting and matching financial data
- Producing reconciliation results
- Posting data to accounting systems
- Operating core platform functionality

6.2 Legitimate Interests

- Security and fraud prevention
- Troubleshooting, debugging, and accuracy improvement
- Usage analytics (non-marketing)
- Improving workflows and efficiency

6.3 Legal Obligations

- Tax and accounting compliance
- Responding to lawful orders
- Maintaining regulatory records

6.4 Consent

Used only for:

- Marketing communications
- Optional cookies/tracking
- Any purpose not covered above

We will only send marketing communications if you have positively opted-in. You can opt-out at any time.

Consent can be withdrawn at any time.

We Do Not

- Sell or rent personal data
- Use personal data for advertising without consent

7. AI-Assisted Processing Transparency

The Service uses AI and algorithmic components to assist with:

- Document extraction
- Classification

- Matching recommendations
- Allocation suggestions

Important:

- AI does **not** make binding financial decisions.
 - A human user is expected to review and approve all results.
 - Customer Data is **not** used for global or shared AI model training.
 - We may use anonymised, aggregated processing patterns to improve quality.
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8. Disclosure of Personal Information

8.1 Service Providers

We may disclose data to trusted third parties that assist in Service delivery, including:

- Cloud infrastructure providers (AWS, GCP, or equivalent)
- Authentication services
- Email/service communication tools
- Accounting system integration services

All processors are contractually bound to confidentiality and data protection obligations.

8.2 Legal Requirements

We may disclose data to comply with:

- Legal obligations
- Court orders
- Regulatory investigations
- Fraud prevention or security enforcement

8.3 Business Transfers

If our business is acquired or merged, data may be transferred under equivalent privacy protections.

8.4 Customer-Directed Disclosures

We disclose data to third parties when explicitly directed (e.g., posting reconciliations to accounting systems).

9. Cookie and Tracking Technologies

We use minimal cookies necessary for secure and effective platform operation.

Types of cookies:

- **Essential Cookies:** Required for login, security, sessions

- **Functional Cookies:** Improve performance and reliability
- **Optional/Analytics Cookies:** Only used with explicit opt-in consent

You may manage cookie preferences via browser settings or our cookie banner (if enabled).

10. Data Security

10.1 Security Controls

We implement industry-standard controls including:

- AES-256-GCM encryption for sensitive data
- SSL/TLS encryption in transit
- Multi-tenant isolation with row-level security
- Secure, encrypted credential storage
- Continuous monitoring
- Access controls and least-privilege permissions
- Audit logging

10.2 API Credentials

API keys and integration tokens are encrypted and not stored in plaintext.

We do **not** store online-banking login credentials.

10.3 Limits

No system can guarantee absolute security.

Customers must:

- Use strong passwords
 - Restrict user access
 - Maintain secure internal practices
 - Review audit logs regularly
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11. Data Breach Notification

Australia

We will notify affected parties **as soon as practicable**, consistent with the Notifiable Data Breaches (NDB) scheme.

EU/EEA/UK

Where applicable, we will notify supervisory authorities within **72 hours** as required by GDPR/UK GDPR.

We will:

- Provide details of the breach
 - Describe likely consequences
 - Outline corrective actions
 - Cooperate with investigations
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12. Cross-Border Data Transfers (APP 8 & GDPR)

Personal information may be stored or processed in Australia, the United States, the European Union, Singapore, or other countries where our service providers operate.

We primarily rely on:

- **EU Standard Contractual Clauses (2021 module)** and UK International Data Transfer Addendum
- **Transfer Impact Assessments** (conducted where required)
- **Binding contractual obligations** on recipients

By using the Service, you acknowledge these transfer mechanisms are in place. Consent is not the primary legal basis for these transfers.

13. Data Retention

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

- Service delivery
- Regulatory compliance
- Dispute resolution
- Security and fraud prevention

Standard retention periods:

- **Customer Data:** Duration of the account + 90 days
- **Processing logs:** Retained for a reasonable period (typically up to 12 months)
- **Financial records:** Retained for 7 years as required under Australian taxation law (Taxation Administration Act 1953 and related legislation)
- **Support correspondence:** Retained for a reasonable period

Deletion

Upon termination or request:

- Customer Data processing stops immediately
- A 60-day data export window is provided
- Data is deleted within 90 days unless required to retain it
- Written confirmation of deletion is available **upon request**

14. Your Privacy Rights

Depending on jurisdiction, individuals may exercise:

- **Access rights**
- **Correction rights**
- **Deletion ("right to be forgotten")**
- **Data portability** (GDPR)
- **Restriction or objection** to processing
- **Withdrawal of consent** (marketing or analytics cookies)

To exercise rights, contact us (see Section 18) with subject line "Privacy Rights Request – receipting.com". We may require identity verification.

Response timeframes:

- **GDPR/UK GDPR:** Within one month (extendable by two months for complex requests)
- **Australia:** Within 30 calendar days of receiving a valid request

15. Record Keeping and Accountability

We maintain appropriate documentation including:

- Records of processing activities **where required**
- Data Processing Agreements with third-party processors
- Logs of security incidents
- Relevant privacy impact assessments for high-risk processing (if applicable to EU data subjects)

These records are available to supervisory authorities upon lawful request.

16. Complaints

Internal: Contact us (see Section 18) with subject "Privacy Complaint". We acknowledge within 5 business days and respond within 30 days.

External:

- **Australia:** Office of the Australian Information Commissioner (OAIC): www.oaic.gov.au
 - **EU/EEA/UK:** Lodge complaints with your regional supervisory authority.
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17. Changes to This Policy

We may update this Privacy Policy with **30 days' notice** for material changes.

Updates will be communicated via:

- Email to account holders
- Notice on receipting.com
- Updated "Effective Date"

Continued use of the Service constitutes acceptance.

18. Contact Information

Email: support@managedfunctions.com

Mail: Managed Functions Pty Ltd

2 Belmore Street

Enmore NSW 2042

Australia

Data Protection Officer (if appointed): [Contact if appointed]

19. Definitions

- **Personal Information / Personal Data:** Information about an identifiable individual (used interchangeably; "Personal Information" under APPs, "Personal Data" under GDPR)
 - **Processing:** Any operation conducted on personal data
 - **Customer Data:** Data submitted by the customer to the Service
 - **Data Subject:** Individual whose personal data is processed
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Acceptance:

By using receipting.com, you acknowledge and agree to this Privacy Policy.

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Last Updated: 27 November 2025