



Virtuosa AI – Privacy Policy

Monolith Building Pty Ltd ACN 156 630 143 (trading as Virtuosa AI) (“**Virtuosa**”, “**we**”, “**our**” or “**us**”) provides an AI-enabled clinical documentation and workflow solution for psychologists and related professionals.

We are committed to protecting your privacy and handling Personal Information in accordance with the **Australian Privacy Principles (APPs)** in the *Privacy Act 1988* (Cth) (the **Privacy Act**).

This Privacy Policy explains how we collect, use, disclose and manage Personal Information in connection with:

- our websites and online resources (including www.virtuosaaai.com);
- our products and services, including the Virtuosa AI software solution; and
- any other interactions you have with us, online or offline.

By providing Personal Information to us (including via our website, products or services), you acknowledge that you have read and understood this Privacy Policy and agree to our handling of your Personal Information as set out in it, subject to any additional rights you may have under the Privacy Act and other applicable laws.

1. HOW WE ACT – CONTROLLER VS SERVICE PROVIDER

Virtuosa acts in different capacities depending on the context:

- **As a service provider to clinics and practitioners:**
When a clinic, practice or other organisation subscribes to the Virtuosa AI software solution and uses it in connection with its clients or patients, that organisation is generally responsible for deciding what information is collected and how it is used. In those circumstances, we handle Personal Information (including health information) on their behalf, in accordance with our agreement with them and their instructions, and this Privacy Policy should be read together with their own privacy policy or notices.
- **As a controller of our own business data:**
When we collect and use Personal Information for our own purposes (for example, to operate our website, manage accounts, bill for services, or conduct marketing and product development), we decide how and why that information is handled. In those situations, we act as the entity primarily responsible for that Personal Information and this Privacy Policy applies to our handling of it.

If you are a client or patient of a psychologist or practice that uses the Virtuosa AI software solution, you should refer to that practitioner's or practice's privacy policy in the first instance, as they are primarily responsible for the information they enter into our solution.

When we provide the Virtuosa AI software solution to clinics and practitioners, those clinics and practitioners are responsible for providing any privacy notices required under the Privacy Act (including under APP 5) to their own clients and patients in relation to their use of the Virtuosa AI software solution. This includes explaining that they use an AI-enabled documentation and workflow tool, that Personal Information (including health information) will be disclosed to us and to certain overseas service providers, and how their clients and patients can exercise their privacy rights in respect of that information.

2. WHAT IS “PERSONAL INFORMATION”?

In this Privacy Policy, **Personal Information** has the meaning given to that term in the Privacy Act. It means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information is true or not and whether recorded in a material form or not.

Depending on your dealings with us, the Personal Information we collect and handle may include:

- identification and contact details (for example, your name, professional role, practice or employer, address, email address, phone number);
- account and subscription details (for example, user account credentials, roles, preferences, usage settings);
- billing and payment information (for example, subscription plan, invoicing details; we typically use third-party payment providers rather than storing full card details ourselves);
- information about how you access and use our websites and services (for example, login times, actions taken in the product, configuration data, device and browser information, IP address and general location information); and
- data you or your organisation input into the Virtuosa AI software solution, which may include **health information** and other “sensitive information” (such as information about a person's health, diagnosis, treatment, risk assessments or other clinical notes), to the extent you choose to include such information in your use of our product.

We treat health information and other sensitive information with particular care and only collect, use or disclose it where permitted by law and where reasonably necessary for providing our products and services or as otherwise described in this Privacy Policy.

3. HOW WE COLLECT PERSONAL INFORMATION

We may collect Personal Information about you in several ways:

- **Directly from you**, including when you:
 - visit or use our websites, customer portal or online resources;
 - request information, a demo, trial or subscription;
 - create or manage a Virtuosa AI account;
 - contact us by email, phone, web form, in person or via social media; or
 - participate in surveys, research, webinars, pilots or feedback programs.
- **Through your use of the Virtuosa AI software solution**, including when:
 - you or your authorised users input or upload information, prompts or documents into the solution, or configure workflows, templates and settings;
 - the system generates outputs, logs and usage data as you use the product; or
 - the product integrates with third-party systems you or your organisation choose to connect (for example, practice management systems).
- **From third parties**, where it is lawful and reasonable to do so, for example:
 - your employer, practice or organisation, where they are our customer and nominate you as an authorised user;
 - integration partners and third-party systems you connect to the Virtuosa AI software solution; or
 - service providers, business partners or publicly available sources (for example, professional registers), where permitted by law and reasonably necessary for our functions and activities.

If we receive Personal Information about you from a third party, we will take reasonable steps, as required by APP 5, to notify you or ensure you are aware of the collection and the matters set out in this Privacy Policy, unless it is obvious from the circumstances or you have already been informed.

Our websites may contain links to third-party sites or services. We are not responsible for the privacy practices of those third parties, and you should review their privacy policies before providing them with your information.

4. WHY WE COLLECT, USE AND DISCLOSE PERSONAL INFORMATION

We collect, hold, use and disclose Personal Information for purposes necessary or related to our functions and activities, including:

- **Delivering and supporting our products and services**
 - to set up, verify and manage accounts and user access;
 - to provide, operate and support the Virtuosa AI software solution and related services;
 - to process orders, subscriptions, renewals and payments; and
 - to provide training, troubleshooting, technical support and customer service.
- **Product and service improvement**
 - to monitor, maintain and improve the performance, safety, usability and reliability of the Virtuosa AI software solution;
 - to understand how the product is used (for example, which features are used most) and where improvements are needed; and
 - to develop new or enhanced features, models and services, including by using de-identified or aggregated data for analytics, benchmarking and research.
- **Security, compliance and risk management**
 - to protect the security and integrity of our systems, services and data;
 - to detect, investigate and help prevent fraud, misuse, security incidents or other harmful activities; and
 - to comply with our legal and regulatory obligations and manage disputes and enforcement of our rights.
- **Communication and relationship management**
 - to respond to enquiries, requests and feedback;
 - to communicate important information about our products and services, such as feature updates, availability changes or security notices; and
 - to manage our relationship with customers, users and partners.
- **Marketing (where permitted)**
 - to send you information about products, services, resources, events or promotions we believe may be of interest to you, as described in “Direct marketing” below.

- **Internal business operations**

- to manage our internal accounting, reporting, governance and training;
- to conduct planning, forecasting and business development; and
- for any other purpose disclosed at the time of collection or otherwise authorised or required by law.

We may also use your Personal Information for related secondary purposes that you would reasonably expect and that are permitted by the Privacy Act, or otherwise with your consent.

5. DISCLOSING PERSONAL INFORMATION

We may disclose Personal Information to third parties where reasonably necessary for the purposes described in this Privacy Policy, or otherwise with your consent or as required or authorised by law. These third parties may include:

- **Service providers and contractors**, such as:

- cloud hosting, data storage, backup and content delivery providers;
- IT, security and analytics service providers;
- communication, customer support and survey tools;
- billing, payment processing and accounting providers; and
- professional advisers (for example, legal, accounting, consulting).

- **Integration and technology partners**

- third-party systems or platforms (for example, practice management or booking systems) that you or your organisation choose to connect to the Virtuosa AI software solution; we disclose data to and receive data from such systems as necessary to provide the integration and as directed by you or your organisation.

- **Your organisation or practice**

- where our customer is an organisation (for example, a clinic or practice) and you are an authorised user, we may share relevant information about your use of our services with that organisation, in accordance with our agreement with them.

- **Regulators, law enforcement and others**

- where required or authorised by law, or where we reasonably believe this is necessary to protect our legal rights, safety or property, or that of others (for example, to regulatory bodies, dispute resolution bodies or law enforcement agencies).

Where we disclose Personal Information to service providers, we only authorise them to use the information as necessary to provide services to us or to comply with their legal obligations, and we take reasonable steps to ensure they are bound by appropriate confidentiality and privacy obligations.

6. OVERSEAS DISCLOSURE

Some of our service providers, systems or data recipients may be located outside Australia, or may access Personal Information from outside Australia. This may include providers in countries such as the United States, member states of the European Union, and other jurisdictions where our cloud hosting, infrastructure, analytics and support providers operate. The exact locations may change from time to time.

Where we disclose Personal Information to overseas recipients, we take reasonable steps to ensure that they do not breach the APPs in relation to the information. These steps may include:

- entering into contractual arrangements requiring them to handle Personal Information in a manner consistent with the APPs and our instructions;
- assessing their security and privacy practices; and
- otherwise ensuring they are subject to privacy protections that are substantially similar to those under the Privacy Act.

You may contact us using the details in the “Contact and complaints” section to request further information about the countries in which our key service providers are located, subject to security and confidentiality considerations.

7. SECURITY OF PERSONAL INFORMATION

We take reasonable steps to protect Personal Information from misuse, interference and loss, and from unauthorised access, modification or disclosure. These steps may include:

- technical measures, such as access controls, authentication, encryption in transit and at rest, network and application security, logging and monitoring;
- organisational measures, including internal policies, procedures, and training for staff and contractors; and
- contractual measures with our service providers requiring appropriate security and confidentiality protections.

However, no method of transmission over the internet or electronic storage is completely secure. We cannot guarantee absolute security of your information. You are responsible for maintaining the confidentiality of any credentials used to access our services and for promptly notifying us of any actual or suspected unauthorised access or security incident.

When Personal Information is no longer needed for the purpose for which it was collected (including to satisfy legal, regulatory or contractual requirements), we will take reasonable steps to destroy or permanently de-identify it, in accordance with our data retention policies and

applicable laws. In general, we retain Personal Information for as long as you have an active relationship with us (for example, while your organisation maintains a subscription to the Virtuosa AI software solution) and for a reasonable period afterwards to comply with our legal obligations, resolve disputes and enforce our agreements. Clinical content stored in the Virtuosa AI software solution is retained in line with our agreement with the relevant customer and will be deleted or de-identified within a reasonable period after termination or as otherwise directed by that customer, subject to any legal requirements to retain records.

8. USE OF AI AND MODEL TRAINING

The Virtuosa AI software solution uses artificial intelligence and machine learning models to assist with clinical documentation and related workflows. In providing these capabilities, we may process Personal Information (including health information) that you or your organisation input into the solution, in order to generate outputs requested by you (for example, draft notes, summaries or templates) and to operate, support and secure the product.

Unless we expressly agree otherwise in writing, we do not use identifiable health information or other identifiable clinical content entered into the Virtuosa AI software solution to train or improve any general-purpose AI models that are made available to other customers.

Where our use of Personal Information in connection with AI and model training goes beyond what is reasonably necessary for providing the Virtuosa AI software solution and related services, we will only do so with your consent or as otherwise permitted or required by the Privacy Act.

9. COOKIES AND ANALYTICS

Our websites may use cookies, web beacons and similar technologies to collect information about how visitors use the site, such as pages visited, time spent, referring sites and browser or device information. This helps us to:

- operate, secure and maintain our websites;
- understand usage patterns and improve content and functionality; and
- measure and improve the effectiveness of our communications and marketing.

Information collected through cookies and analytics is generally aggregated and does not personally identify you. However, some information may be linked with other data we hold and treated as Personal Information.

You can usually adjust your browser settings to refuse or delete cookies, but this may affect the functionality of some parts of our websites.

10. ACCESS TO AND CORRECTION OF PERSONAL INFORMATION

We take reasonable steps to ensure that Personal Information we collect, use and disclose is accurate, up to date, complete and relevant.

You may request access to the Personal Information we hold about you, and request correction of that information if you believe it is inaccurate, out of date, incomplete, irrelevant or misleading, subject to certain exceptions permitted by law.

If you wish to access or correct your Personal Information, please contact us using the details in the “Contact and complaints” section. We may need to verify your identity before providing access or making corrections, to protect your privacy.

We will respond to your request within a reasonable time. We will not charge you for making a request, but we may charge a reasonable administrative fee for providing copies of your information, where permitted by law. If we refuse your request for access or correction, we will provide you with a written explanation (where reasonable) and inform you of the avenues available to complain about the decision.

11. MAINTAINING THE QUALITY OF PERSONAL INFORMATION

We are committed to maintaining the quality, accuracy and completeness of the Personal Information we hold. We rely on you to help us keep your Personal Information current.

If you believe that any Personal Information we hold about you is incorrect, incomplete, out of date or misleading, please contact us as soon as practicable. We will promptly assess your request and, where appropriate, correct or update our records.

12. CHANGES TO THIS PRIVACY POLICY

We may review and update this Privacy Policy from time to time to reflect changes in our practices, legal obligations, technologies or business requirements. The most current version will be available on our website.

We encourage you to check our website periodically to ensure you are familiar with our current Privacy Policy. Your continued use of our websites or services after any changes take effect will constitute your acceptance of the updated Privacy Policy, to the extent permitted by law.

13. CONTACT AND COMPLAINTS

If you have any questions about this Privacy Policy, wish to request access to or correction of your Personal Information, or wish to make a privacy complaint, you can contact us by emailing us at admin@virtuosaai.com.

If you make a complaint, please provide enough detail for us to understand your concerns. We will investigate and respond to your complaint within a reasonable time and in accordance with our obligations under the Privacy Act and the APPs.

If you are not satisfied with our response, you may have the right to contact the Office of the Australian Information Commissioner (OAIC) or another relevant regulator. Information about how to make a privacy complaint to the OAIC is available at www.oaic.gov.au.