



## **Privacy Policy – Mojotech Holdings Pty Ltd.**

**Effective Date:** 9 May 2025

**Last Updated:** 3 July 2025

At Mojotech Holdings Pty Ltd ("we", "our", or "us"), your privacy is important to us. We are committed to protecting your personal information in accordance with the Australian Privacy Principles (APPs) contained in the *Privacy Act 1988 (Cth)*. This Privacy Policy explains how we collect, use, disclose, and safeguard your information.

### **1. Who We Are**

Mojotech Holdings Pty Ltd is an Australian technology company that provides patient care management technology services. This Privacy Policy applies to all personal information collected by Mojotech Holdings, including through our websites, products, and services.

### **2. What Information We Collect**

We may collect and hold the following types of personal information:

#### **a. Identifiable Information**

- Full name
- Email address
- Phone number
- Business name
- Job title or position

#### **b. Technical Information**

- IP address
- Browser type and version
- Website usage data (via cookies or analytics tools)
- Customer support communications
- Device model, operating system version, and other technical identifiers (not linked to personal identity)

#### **c. Other**

- Any additional information you provide to us voluntarily, such as through contact forms, surveys, or account sign-ups.

### **3. How We Collect Your Information**

We collect personal information in a variety of ways, including:

- When you contact us via our website, email, or phone
- When you sign up for services or an account
- When you use our products or services
- Through automated means such as cookies and analytics on our website
- When you interact with us on social media or third-party platforms

#### **4. Why We Collect Your Information**

We collect your personal information to:

- Deliver and maintain our services
- Communicate with you regarding your account or inquiries
- Process payments and manage transactions
- Improve our services and user experience
- Comply with legal and regulatory obligations
- Send you updates, marketing communications, or service notices (you can opt out at any time)

We will only send you marketing communications with your consent, in compliance with the Spam Act 2003 (Cth). You can opt out at any time by following the unsubscribe instructions in our emails.

#### **5. Disclosure of Personal Information**

We do not sell or rent your personal information. We may disclose your information in the following circumstances:

- To third-party service providers who assist us with our business operations (e.g., hosting, analytics, payment processing)
- To legal or regulatory authorities, when required by law
- To business partners or affiliates with your consent
- In the event of a business merger, acquisition, or sale

All third-party providers are required to handle your data in compliance with Australian privacy laws.

#### **6. Cross-Border Disclosure**

Some of our service providers may store or process data outside of Australia. When this occurs, we take reasonable steps to ensure your information is handled in accordance with Australian Privacy Principles and applicable laws in the relevant jurisdiction.

#### **7. Security of Your Information**

We take data protection seriously and implement reasonable administrative, technical, and physical safeguards to protect your personal information from:

- Loss or theft
- Unauthorised access
- Misuse or interference
- Modification or disclosure

However, no method of transmission over the Internet is 100% secure. We cannot guarantee absolute security, but we strive to use commercially acceptable means to protect your personal information.

## **8. Access and Correction**

You have the right to:

- Access the personal information we hold about you
- Request corrections if your information is inaccurate, outdated, or incomplete

To make a request, please contact us using the details below. We may require verification of your identity before responding to your request.

## **9. Retention of Data**

We retain personal information only as long as necessary to fulfill the purposes for which it was collected or to comply with legal, tax, or regulatory requirements. When no longer needed, we securely delete or anonymise your data.

## **10. Facial Tracking Data – Use of Apple TrueDepth Camera**

Mojo uses Apple's TrueDepth camera API to collect real-time facial tracking data during rehabilitation exercise sessions. This data includes the face anchor transform matrix, which represents the user's head position and orientation in space. No images or video footage or uniquely identifying data are captured or stored — only numeric head position tracking data.

a. We use this data to:

- Analyse head movement patterns during guided exercises
- Support clinical accuracy and adherence
- Enable avatar-based replay functionality for user feedback and clinical review
- Help users and clinicians gain insight into exercise performance and rehabilitation progress

b. How We Handle This Data

- The data is collected in real time during app use
- It is transmitted securely to our servers using encryption protocols
- It is stored only for clinical replay and review functionality
- It is not used for user identification or authentication
- It is not shared with any third parties, advertisers, or analytics providers
- Access is restricted to authorised clinical personnel and the user.

Mojo does not use facial recognition, and we do not attempt to identify any user based on this data. We use facial tracking solely for clinical and rehabilitative purposes.

## **11. Use of Cookies and Analytics**

Our website uses cookies and other tracking technologies to improve user experience and analyse traffic. You can choose to disable cookies in your browser settings, although this may affect website functionality.

## **12. Your Rights and Choices**

Under the Privacy Act, you have the right to:

- Request information about what personal data we collect, how it is used, and who it is shared with
- Opt out of marketing communications
- Lodge a complaint if you believe we've mishandled your information

## **13. Complaints and Inquiries**

If you have any concerns or complaints about how your personal information has been handled, please contact us first so we can resolve the issue promptly.

If you're not satisfied with our response, you can contact the **Office of the Australian Information Commissioner (OAIC)**:

Website: <https://www.oaic.gov.au>

Phone: 1300 363 992

## **14. Contact Us**

If you have any questions about this Privacy Policy or wish to exercise your rights, please contact:

**Mojotech Holdings Pty Ltd**

Level 6, 66 Clarence Street, Sydney NSW 2000

Email: [privacy@mojohealthtech.com](mailto:privacy@mojohealthtech.com)