



PRIVACY POLICY

What we collect, and *why* we need it.

How Grounded Business Advisory collects, holds, uses and discloses personal information — what we ask for, why we need it, who else sees it and what you can ask us to do about it.

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The live version of this policy is published on our website. This PDF is refreshed from it.

EFFECTIVE DATE

1 October 2026

VERSION

1.0

LEGAL OPERATOR

Grounded Business Advisory Pty Ltd trading as Grounded Business Advisory

LIVE SOURCE OF TRUTH

groundedbusinessadvisory.com.au/privacy

01 | ABOUT THIS POLICY

This Privacy Policy explains how Grounded Business Advisory Pty Ltd trading as Grounded Business Advisory (Grounded, we, us or our) collects, holds, uses and discloses personal information.

We aim to handle personal information consistently with the Australian Privacy Principles as a matter of good practice, and we comply with the Privacy Act 1988 (Cth) where it applies to us.

What is personal information?

Personal information is information or an opinion about an identified individual, or an individual who is reasonably identifiable. It may include a person's name, contact details, role, correspondence or other information that can reasonably identify them.

Sensitive information is a more protected category of personal information. It may include health information, racial or ethnic origin, political opinions, religious or philosophical beliefs, professional or trade-association membership, union membership, sexual orientation, criminal record, genetic information and some biometric information.

02 | WHAT WE COLLECT, AND HOW

What information may Grounded collect?

Depending on how you interact with Grounded, we may collect:

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- Identity and contact information — name, role, business, email address, telephone number and location.
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- Enquiry, appointment and communication details.
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- Information about your business, team, responsibilities, workflow, capacity, systems, priorities and concerns.
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- Documents, responses, notes, opinions and supporting information provided for an Evaluation Review or another agreed service.
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- Names, roles and business contact details of team members, advisers, referral partners or others connected with the work.
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- Engagement, proposal, contract, invoice and payment-administration information.
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- Marketing preferences and records of consent.
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- Website and technical information — IP address, browser type, device information, pages visited, referral source and cookie or analytics data.
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- Any other information you choose to provide that is reasonably relevant to your enquiry or the agreed work.
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02 | WHAT WE COLLECT, AND HOW — CONTINUED

Sensitive information

Grounded does not ordinarily need sensitive information. Please avoid providing it unless we have asked for it, or it is genuinely relevant to the concern being reviewed. Where we do collect sensitive information, we will seek consent where required and only handle it as permitted by law.

How do we collect personal information?

We usually collect personal information directly from you when you use our website, submit an enquiry or subscribe to communications; email, telephone or meet with us; book an appointment or take part in a conversation, workshop or service; complete a Business Snapshot, Evaluation Reflection, questionnaire or other form; provide documents, correspondence or supporting information; or enter into and administer an engagement with Grounded.

We may also collect information from a person you have authorised to deal with us; your business, team members, advisers or representatives where relevant and appropriate; a referral partner or professional contact; publicly available sources such as business websites, professional profiles and public registers; and service providers used to operate our website and business systems.

If you provide personal information about another person, please make sure you are authorised to do so and, where appropriate, make them aware of this Privacy Policy.



03 | WHY WE COLLECT AND USE IT

Why do we collect, use and disclose personal information?

We may collect, hold, use and disclose personal information to:

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| — Respond to enquiries and understand what has prompted a request for support. | — Operate, secure, maintain and improve our website, systems and services. |
| — Assess whether Grounded may be an appropriate fit. | — Meet legal, regulatory, insurance and professional obligations. |
| — Scope, provide and administer the Evaluation Review and other agreed services. | — Prevent or respond to suspected misuse, fraud, security incidents or unlawful activity. |
| — Communicate with clients, prospective clients, referral partners, suppliers and advisers. | — Manage complaints and disputes. |
| — Prepare findings, recommendations, roadmaps, proposals and other agreed work. | — Send updates or marketing where we have consent or are otherwise permitted by law. |
| — Manage appointments, contracts, invoicing, payments, insurance, risk and business records. | |

If you do not provide information we reasonably need, we may be unable to respond fully, assess fit or provide the requested service.



03 | WHY WE COLLECT AND USE IT — CONTINUED

IMPORTANT TO UNDERSTAND

Evaluation and client information

Our work may involve business records and information about people who work in or advise a client's business. We ask only for information reasonably relevant to the concerns raised and the agreed scope.

Grounded may scan information supplied and determine what requires detailed review according to its relevance to the Review discussion and material findings. Please avoid supplying unrelated personal information, and consider whether documents can be limited or redacted before they are shared.

The Grounded Evaluation Review is a business operating review. It is not a legal, financial, accounting, taxation, employment-compliance or formal audit opinion. Grounded does not independently verify every statement or document, and the Review does not replace specialist advice.

Unsolicited information

If we receive personal information we did not request, we will consider whether it is reasonably necessary for our functions or activities and whether we could lawfully have collected it. Where it is not required or appropriate to retain the information, we take reasonable steps to delete, destroy or de-identify it, subject to legal and technical requirements.

Data quality

Grounded takes reasonable steps to ensure personal information used or disclosed is accurate, up to date, complete and relevant. Please contact us if your information changes or you believe the information we hold is inaccurate.



04 | WHO WE DISCLOSE IT TO

Who may we disclose information to?

Grounded may disclose personal information where reasonably necessary to:

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- Contractors or personnel supporting the agreed work.
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- Netlify, which hosts and serves our website.
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- HubSpot, which receives website enquiry and resource-request forms and holds our contact and marketing records.
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- Resend, which sends our transactional and subscription email.
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- Microsoft 365 and SharePoint, which provide our email, calendar, document storage and the secure route for client material.
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- Notion, which holds our internal working notes and engagement records.
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- Other providers used to run the business — electronic signature, accounting, payment, backup, analytics and communications.
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- Accountants, lawyers, insurers and other professional advisers.
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- Referral partners or other advisers where you have asked us to make an introduction or agreed to the disclosure.
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- Government agencies, regulators, courts, tribunals, law-enforcement bodies or others where required or authorised by law.
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- Another party involved in a proposed or actual restructure, sale or transfer of the business, subject to appropriate confidentiality and legal safeguards.
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We do not sell personal information.



Overseas storage and disclosure

Some technology and service providers we use may store or process information outside Australia.

The countries involved vary by provider and change as those providers change their own infrastructure, so they are not listed here. Grounded maintains a current list of its service providers and the regions in which they store or process information, available on request from privacy@groundedbusinessadvisory.com.au.

Where the Privacy Act applies, Grounded will take the reasonable steps required by law in relation to overseas disclosures. Overseas privacy protections may differ from those in Australia.

05 | WEBSITE, COOKIES AND MARKETING

Website, cookies and analytics

When you use our website, our website platform or service providers may collect technical information such as your IP address, device and browser details, pages visited, time and date of access and the website that referred you.

Some of this is how the website works at all. Netlify, which hosts the site, processes requests and keeps server and security logs, and the site sets the cookies it needs to serve pages, keep a session secure and remember a preference you have set. These cannot be switched off without the site ceasing to function.

Anything beyond that is separate. Where we use analytics, tracking pixels, embedded third-party tools or marketing technology, each one is named in the provider list described above, with what it does and what it collects; where consent is required before it runs, the site asks for it and you can withdraw it.

You can control some cookies through your browser settings. Disabling cookies may affect how parts of the website function.



Our website forms

Submitting an enquiry or requesting a resource authorises Grounded to do the thing you have asked for — to reply to the enquiry, or to send the resource. It is not consent to marketing.

Marketing consent is asked for separately and is always optional. The Founder Reflection subscription box is unticked by default, and you can unsubscribe from any message we send.

Please do not send confidential documents, employee records, customer data or sensitive information through a public form. Once scope is agreed we will give you a secure SharePoint route for that material.

Each form links to this policy at groundedbusinessadvisory.com.au/privacy.

Direct marketing

Grounded may send business updates, resources or service information where you have consented or where otherwise permitted by law. Commercial electronic messages will identify Grounded and include a clear way to unsubscribe.

You can withdraw your consent or opt out at any time by using the unsubscribe facility in a message or contacting us. We will action electronic-message unsubscribe requests within the period required by the Spam Act 2003 (Cth), generally five working days.

We do not use sensitive information for direct marketing.



Security and retention

Grounded takes reasonable steps to protect personal information from misuse, interference, loss and unauthorised access, modification or disclosure. Measures may include access controls, multi-factor authentication, reputable service providers, secure transmission and storage practices, backups, device security and procedures for handling confidential information.

No method of electronic transmission or storage is completely secure, and Grounded cannot guarantee absolute security.

We retain personal information only for as long as reasonably required for the purpose for which it was collected and to meet legal, insurance, professional and business-record obligations. When information is no longer required, Grounded takes reasonable steps to delete, destroy or de-identify it, subject to backup, legal and technical limitations.

Data breaches

Grounded will investigate suspected data breaches and take reasonable steps to contain and address them. Where the Privacy Act and Notifiable Data Breaches scheme apply, Grounded will notify affected individuals and the Office of the Australian Information Commissioner when required.

Automated decision-making

Grounded does not currently use personal information in a solely automated process to make decisions that could reasonably be expected to significantly affect an individual's rights or interests.

If this changes, Grounded will review and update this Privacy Policy before the relevant use begins and include any information required by law.



07 | ACCESS, CORRECTION AND COMPLAINTS

Access and correction

You may ask to access personal information Grounded holds about you or request that it be corrected. Contact us using the details below and describe the information concerned.

Grounded may need to verify your identity before responding. We will respond within a reasonable period and, if access or correction is refused, explain the reasons and available complaint mechanisms where required by law. We will not charge you for making a request. If the law permits a reasonable charge for providing access, we will explain the proposed charge before proceeding.

PRIVACY ENQUIRIES AND COMPLAINTS

PRIVACY CONTACT Privacy Officer, Grounded Business Advisory

EMAIL privacy@groundedbusinessadvisory.com.au

Please provide enough detail for us to understand and investigate the issue. Grounded will acknowledge the complaint and respond within a reasonable period.

If the Privacy Act applies to Grounded and you are not satisfied with our response, you may be able to complain to the Office of the Australian Information Commissioner. Visit oaic.gov.au for current contact and complaint information.



08 | CHANGES AND DOCUMENT CONTROL

Changes to this policy

Grounded may update this Privacy Policy when its practices, systems or legal obligations change. The current version is published on our website with its effective date. The website page is the live source of truth, and this PDF is refreshed whenever that page changes materially.

DOCUMENT CONTROL

VERSION 1.0

VERSION DATE 1 October 2026

LEGAL OPERATOR Grounded Business Advisory Pty Ltd trading as Grounded Business Advisory

ABN 57 702 886 011

PRIVACY CONTACT privacy@groundedbusinessadvisory.com.au

WEBSITE groundedbusinessadvisory.com.au

GOVERNING LAW Queensland, Australia

Enough *structure* to feel supported.

Enough *movement* to keep growing.

groundedbusinessadvisory.com.au/privacy

privacy@groundedbusinessadvisory.com.au