

PRIVACY POLICY – SLED TECHNOLOGIES PTY LTD

1. Introduction

SLED Technologies Pty Ltd (ACN 692 089 759) (“SLED”, “we”, “us”, “our”) is a technology provider that develops and supplies digital platforms for parking management, compliance, enforcement support, and Pay-By-QR parking payments to third-party organisations, including parking operators, asset owners, universities, councils, airports and private land managers (“Customers”)

This Privacy Policy explains how SLED collects, holds, uses, and discloses personal information in accordance with the **Privacy Act 1988 (Cth)** and the **Australian Privacy Principles (APPs)**.

2. Scope & Role of SLED

This Privacy Policy applies to personal information that is:

- Collected directly by SLED; and/or
- Processed through SLED’s technology platforms on behalf of Customers.

In most circumstances, SLED acts as a technology service provider and data processor. Customers determine how and why personal information is used in connection with parking management, compliance, enforcement, or payment activities. SLED processes information only in accordance with Customer instructions and applicable law.

SLED does not independently determine the purposes for which personal information is used and does not make enforcement, payment, or compliance decisions in relation to parking activities.

3. Definitions

For the purposes of this Privacy Policy:

“Personal Information” the meaning given in the Privacy Act 1988 (Cth) and includes any information or 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.

“Customer” means any organisation, entity, or authority that engages SLED to provide access to or use of the Platform, including parking operators, asset owners, universities, councils, government bodies, and private land managers.

“Platform” means any software, system, application, interface, dashboard, API, or technology solution developed, owned, or operated by SLED, including parking management systems, compliance and enforcement support tools, digital permit systems, licence plate recognition integrations, Pay-By-QR payment functionality, and associated reporting, analytics, or audit tools.

“End User” means any individual who interacts with the Platform, including motorists, visitors, guests, contractors, or members of the public who register vehicles, make parking payments, or otherwise engage with parking systems powered by the Platform.

“Customer User” means an employee, contractor, or authorised representative of a Customer who is granted access to the Platform for operational, administrative, compliance, enforcement, or reporting purposes.

“Parking Data” means information generated or processed through the Platform in connection with parking activity, including vehicle registration numbers, images or video of vehicles, timestamps, location data, permit or authorisation records, and payment status information.

“Pay-By-QR” means a parking payment method enabled through the Platform whereby an End User scans a QR code to initiate and complete a parking payment session.

“Payment Processor” means a third-party provider engaged to process parking payments made via the Platform, including Stripe Payments Australia Pty Ltd and its related entities (“Stripe”)

“Enforcement Activity” means any action taken by a Customer in connection with monitoring compliance with parking conditions, investigating breaches of site-specific Terms of Entry, issuing notices, managing appeals, or pursuing recovery actions, in accordance with applicable laws.

“Terms of Entry” means the parking terms and conditions displayed at, or otherwise applicable to, a site managed by a Customer, including conditions relating to authorisation, duration, payment, and compliance.

“Marketing Communications” means communications sent by or on behalf of SLED for the purpose of providing information about SLED’s products, services, features, or functionality, including updates, announcements, or promotional materials, where permitted by law.

4. Type of Personal Information Collected

Depending on how a Customer configures and uses the Platform, SLED may collect or process:

Parking and Compliance Information

- Vehicle registration numbers
- Images or video of vehicles (including license plate recognition data)
- Date, time and location data
- Permit, authorisation, or registration records

Pay-By-QR and Transaction Information

- Payment reference identifiers
- Transaction timestamps and amounts
- Vehicle, session, or authorisation identifiers linked to a payment
- Confirmation of payment status

SLED **does not** store full credit card, debit card, or bank account details. All payments are processed by Stripe in accordance with its privacy and security standards.

User, Contact, and Technical Information

- Customer User account details
- Contact details submitted via forms, portals, or QR interactions
- Communications or enquiries submitted through the Platform
- IP addresses, device identifiers, browser information, and system logs

SLED does not intentionally collect sensitive information.

5. How Personal Information is Collected

Personal information may be collected or generated through:

- Automated parking management and compliance systems, including camera-based technologies
- QR-based vehicle registration, Pay-By-QR payment, and digital authorisation tools
- Online portals, dashboards, and forms
- API integrations with third-party systems
- Direct input by authorised Customer Users
- Communications made to SLED in connection with the Platform

6. Purpose of Collection and Processing

SLED collects and processes personal information for purposes including:

- Operating, maintaining, and improving the Platform
- Enabling Customers to manage parking permissions and authorisations
- Facilitating Pay-By-QR parking payments and transaction validation
- Supporting monitoring of compliance with site-specific Terms of Entry
- Providing Customers with reports, audit logs, and system outputs
- Supporting enforcement, recovery, or dispute workflows as directed by Customers
- System security, fraud prevention, audit, and risk management
- Compliance with legal and regulatory obligations
- Communicating with Customers and authorised users regarding Platform updates, services, and marketing initiatives, where permitted by law

7. Marketing Communications

SLED may use personal information to send Marketing Communications to Customers, authorised Customer Users, or other business contacts who have interacted with SLED or expressed interest in its services.

Recipients may opt out of Marketing Communications at any time by using the unsubscribe mechanism provided in the communication or by contacting SLED directly.

SLED does not sell personal information for marketing purposes and does not disclose personal information to third parties for their independent marketing use.

8. Pay-By-QR Payments (Stripe)

Where Customers enable Pay-By-QR functionality:

- Parking payments are processed securely by Stripe
- SLED receives and processes payment confirmation and transaction reference data only
- Stripe processes payment information in accordance with its own privacy policy and PCI-DSS obligations
- Transaction data may be linked to Parking Data to confirm compliance with parking conditions

SLED does not act as a financial institution and does not determine parking fees, charges, refunds, or enforcement outcomes relating to unpaid parking.

9. Enforcement-Related Processing

Where the Platform is used to support Enforcement Activities:

- Personal information is processed at the direction of the Customer
- SLED does not independently assess liability or determine compliance outcomes
- SLED does not issue penalties, fines, or infringement notices
- All enforcement decisions are made by Customers in accordance with their legal authority, site-specific Terms of Entry, and applicable laws

Customers are responsible for ensuring appropriate signage, terms, and legal authority exist at the relevant site.

10. Disclosure of Personal Information

SLED may disclose personal information:

- To Customers using the Platform for lawful parking management, payment validation, compliance, enforcement, dispute resolution, or recovery purposes
- To Stripe for the purpose of processing Pay-By-QR transactions
- To service providers and contractors assisting in operating the Platform (subject to confidentiality and privacy obligations)
- Where disclosure is required or authorised by law
- Where necessary to investigate misuse, fraud, or security incidents

11. Overseas Disclosure

Some service providers, including Stripe, may store or process personal information outside Australia. Where overseas disclosures occur, SLED takes reasonable steps to ensure recipients handle personal information in a manner consistent with Australian privacy requirements.

12. Data Security

SLED takes reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, modification, or disclosure, including:

- Secure hosting environments
- Role-based access controls
- Encryption of data in transit where appropriate
- Monitoring, logging, and audit controls

13. Access and Correction

Individuals may request access to, or correction of, personal information processed by SLED. Where information is processed on behalf of a Customer, requests may be referred to the relevant Customer for handling.

14. Data Retention

Personal information is retained only for as long as necessary to support Platform operations, Customer requirements, payment reconciliation, audit, enforcement support, or legal compliance, unless a longer retention period is required or authorised by law.

15. Complaints

If you have a complaint or concern about how SLED has handled personal information, you may contact us using the details below:

SLED Technologies Pty Ltd

Email: info@sledtech.com.au

We will investigate privacy complaints and respond within a reasonable timeframe in accordance with the **Privacy Act 1988 (Cth)**.

If you are not satisfied with our response, you may lodge a complaint with the **Office of the Australian Information Commissioner (OAIC)**.

16. Changes to this Policy

This Privacy Policy may be updated from time to time. The current version will be published on SLED's website and will take effect from the date of publication.

17. Acceptance

By interacting with systems powered by the SLED Platform, including Pay-By-QR services, you acknowledge that personal information may be collected and processed in accordance with this Privacy Policy and the applicable privacy policy of the relevant Customer.