

Privacy Policy (Australia) — Grumbl

Effective date: 11 September 2026

Grumbl (“Grumbl”, “we”, “us”, “our”) provides a local community offers platform that lets businesses publish offers and lets users view and redeem offers in-store.

This Privacy Policy explains how we collect, use, disclose, and store personal information when you use the Grumbl mobile application and related services (the “App”). We comply with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs).

1) What information we collect

We may collect the following types of information.

A. Information you provide

- Account details (if you create an account): name, email address, phone number, password (stored in encrypted/hashed form).
- Business account details (for merchants): business name, ABN (if provided), contact name, email, phone, store address(es), offer content, and related business profile information.
- Support communications: messages you send to us, and any information you include.

B. Information collected automatically

- Device and app data: device type, operating system, app version, language, time zone, identifiers (such as advertising ID or device ID where permitted), and crash/diagnostic logs.
- Usage data: screens viewed, interactions with offers, clicks, redemptions, and session information.
- Approximate location: we may infer approximate location from IP address.

C. Location information (optional)

If you enable location permissions, we may collect precise location to show nearby offers and improve relevance. You can disable precise location at any time in your device settings.

D. Offer redemption information

When you redeem an offer, we may record: - the offer ID, time and date of redemption, and the participating business/location.

2) How we use personal information

We use personal information to: - Provide and operate the App (including displaying offers and enabling redemption). - Create and manage user and business accounts. - Personalise and improve the feed (including showing nearby or relevant offers). - Measure performance and analytics (e.g., offer views and redemptions). - Communicate with you (service messages, updates, and support). - Detect, prevent, and respond to fraud, misuse, or security issues. - Comply with legal obligations and enforce our terms.

3) Legal basis / consent

Where required, we rely on: - Your consent (e.g., for precise location permissions, marketing where applicable). - Performance of a contract (to provide the App features you request). - Legitimate interests (such as security, fraud prevention, and service improvement), balanced with your rights.

4) How we disclose personal information

We may disclose personal information to: - Participating businesses: limited information necessary to validate redemptions and operate offers (for example, confirmation that an offer was redeemed, and the time/date). We do not share your payment information because Grumbl does not process payments for in-store purchases. - Service providers (processors) who help us run the App, such as hosting, analytics, customer support tools, messaging providers, and error monitoring. - Professional advisers: legal, accounting, or audit advisers. - Authorities: regulators, law enforcement, or courts where required or authorised by law.

We do not sell personal information.

5) Overseas disclosures

Some of our service providers may store or process data outside Australia (for example, in the United States or other regions). Where this occurs, we take reasonable steps to ensure overseas recipients handle personal information in a manner consistent with the Australian Privacy Principles.

6) Marketing communications

We may send you marketing communications where permitted by law (including the Spam Act 2003 (Cth)). - You can opt out at any time using the unsubscribe link or in-app settings (where available). - We may still send important service messages (e.g., security or account notices).

7) Cookies and similar technologies

The App may use SDKs and similar technologies (e.g., analytics and crash reporting) that collect device and usage information. You may be able to limit certain tracking via your device settings.

8) Data retention

We keep personal information only as long as reasonably necessary to: - provide the App, - meet legal and accounting requirements, - resolve disputes, and - enforce our agreements.

We take reasonable steps to de-identify or delete personal information when it is no longer needed.

9) Security

We take reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, modification, or disclosure. No method of transmission or storage is completely secure, and we cannot guarantee absolute security.

10) Your rights and choices

Depending on your circumstances, you may have the right to: - Access personal information we hold about you. - Request correction of inaccurate, out-of-date, incomplete, irrelevant, or misleading information. - Withdraw consent (e.g., location permissions) at any time. - Request deletion of your account (subject to legal retention requirements).

To make a request, contact us using the details below.

11) Children

Grumbl is not intended for children under 13. We do not knowingly collect personal

information from children under 13. If you believe a child has provided personal information, contact us and we will take reasonable steps to delete it.

12) Third-party links and services

The App may contain links to third-party websites or services (including business pages). We are not responsible for the privacy practices of third parties. Please review their privacy policies.

13) Complaints

If you have a complaint about how we handle personal information, please contact us and we will respond within a reasonable time. If you are not satisfied, you may contact the Office of the Australian Information Commissioner (OAIC) at <https://www.oaic.gov.au>.

14) Contact us

Grumbl Privacy Contact

Email: privacy@grumbl.com.au (or your nominated privacy email)

Address: Australia (add your business address)

15) Changes to this policy

We may update this Privacy Policy from time to time. We will post the updated version in the App and update the effective date above.

This template is general information and not legal advice. Consider having an Australian privacy professional review it for your specific data flows and integrations.