

Axel Privacy Policy

This chat service (**Axel**) is provided to you by Auto Grab Pty Ltd (ABN 79 638 468 569), in conjunction with Vyro Pty Ltd (ACN 653 976 099) (**Vyro**) (**we, us** or **our**). Axel provides you with access to certain tools and functionalities that utilise or are powered by artificial intelligence systems.

We take your privacy seriously and are committed to responsible privacy practices. We seek to comply with our obligations under all applicable data protection and privacy laws and regulations, including but not limited to the *Privacy Act 1988* (Cth) (**Privacy Act**) (together, **Privacy Laws**).

This Privacy Policy describes how we collect, use, disclose, store, and handle your personal information, in connection with your use of Axel. This Privacy Policy does not apply to data you provide to us on the Cars for CommBank platform, outside of Axel. That data is governed by the Vyro Privacy Policy, accessible via the following link: <https://www.vyro.co/privacy-policy>.

What is Personal Information?

In this Privacy Policy, personal information has the meaning set out in the Privacy Act (**Personal Information**). In general terms, Personal Information is information (whether fact or opinion) about an individual who is identified or reasonably identifiable.

Some types of Personal Information are designated as sensitive information, which is subject to additional protection under Privacy Laws.

What types of Personal Information do we collect?

You should not disclose Personal Information to us when using Axel, including in your prompts, messages or uploads. To the extent you do, such Personal Information may be collected by us and will be treated in accordance with this Privacy Policy.

We may also collect technical information and general analytics, such as web browser type and browsing preferences, internet service provider, referring/exit pages, and date/time stamps, IP address, time zone, and geolocation data (if applicable) arising from your use of Axel.

How do we collect personal information?

We collect your Personal Information directly from you, when you access or use Axel.

We also use the following technologies to collect technical information and general analytics:

1. cookies, which are data files that are placed on your device and often include an anonymous unique identifier. For more information about cookies, and how to disable cookies, visit <http://www.allaboutcookies.org>;
2. log files, which track actions occurring on Axel; and
3. web beacons, tags, and pixels, which are electronic files used to record information about how you use Axel.

By using Axel, you are consenting to the use of these technologies in accordance with this Privacy Policy.

Can you choose not to disclose your personal information?

You decide what Personal Information you disclose to us and should avoid disclosing any Personal Information when using Axel. Axel is not intended to be used to process Personal Information or respond to prompts or questions relating to your Personal Information.

If you contact us to make an enquiry using the contact details provided in this Privacy Policy, you may need to identify yourself or provide Personal Information for us to be able to provide you with the information or assistance you require. For example, we will not be able to send you information you request, if you do not provide us with a valid email address or telephone number.

How do we use your Personal Information?

We may use your Personal Information for our administrative, quality control, and research purposes and for other purposes to which you have consented, or as otherwise permitted or required by law.

Technical information and general analytics are used for the purpose of gauging visitor traffic, trends and delivering content you may be interested in while you are on our websites or apps, and to improve our websites, apps and our products and services.

To whom do we disclose Personal Information?

We may disclose your Personal Information to third parties in connection with the purposes described above (see the "How do we use your Personal Information?" section). This may include disclosing your Personal Information to the following types of third parties:

1. our related bodies corporate;
2. our employees, contractors and third party service providers who assist us in providing Axel e.g. cloud service providers, data storage providers and IT support services providers; and
3. any other person as required or permitted by law.

If we disclose your Personal Information to third parties we will use reasonable efforts to ensure that such third parties only use your Personal Information as reasonably required for the purpose of disclosure and in a manner consistent with applicable laws, for example (where commercially practical) by including suitable privacy and confidentiality clauses in our agreement with a third party service provider to which we disclose your Personal Information.

Does Personal Information leave Australia?

We store Personal Information in servers located in Australia. We may disclose your Personal Information to overseas recipients, such as to service providers located overseas (including Google Cloud). It is not practical for us to list every country where such overseas recipients may be located, however such countries are likely to include the USA.

Except where an exception applies under Privacy Laws, we will take commercially reasonable steps to ensure that overseas recipients to whom we disclose Personal Information do not breach Privacy Laws in relation to such information.

How do we protect your Personal Information?

We will take reasonable precautions to protect your Personal Information from misuse, loss, or unauthorised access, modification or disclosure. However, as the internet is inherently insecure, we cannot guarantee the security of transmission of Personal Information you disclose to us through Axel. Accordingly, you transmit your Personal Information to us online at your own risk. Please notify us immediately if you become aware of any breach of security.

How long do we keep your Personal Information?

Generally, we will retain your Personal Information for the period necessary for the purposes for which your Personal Information was collected (as outlined in this Privacy Policy) unless a longer retention period is required by law or if it is reasonably necessary for us to comply with our legal obligations, resolve a dispute or maintain security.

When Personal Information is no longer required, we will take reasonable steps to delete the Personal Information from our systems or de-identify the Personal Information.

How can you access and correct your Personal Information?

You may request access to any Personal Information we hold about you at any time by contacting us. We will provide access to that information in accordance with Privacy Laws, subject to any exemptions that may apply. We may charge an administration fee in limited circumstances.

If you believe that Personal Information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it by contacting us.

Exemptions and inconsistency with law

Where local laws allow for an exemption to compliance with certain legal obligations, we may rely on such an exemption. This Privacy Policy will not apply to the extent that it is inconsistent with any applicable law.

Changes to this Privacy Policy

We may change this Privacy Policy from time to time, at our discretion. Your continued use of Axel will signify your agreement to this Privacy Policy, as amended from time to time.

What is the process for complaining about a breach of privacy?

If you have any questions, concerns or complaints about our collection, use, disclosure or management of your Personal Information, please contact us in writing using the contact details below.

AutoGrab
Attention: Privacy Officer
4/10 River Street

South Yarra VIC 3141
support@autograb.com.au

We will review and assess your complaint, with the aim of resolving any issue in a timely and efficient manner. If you are unsatisfied with the outcome, we will advise you about further options including, if appropriate, review by the Privacy Commissioner within the Office of the Australian Information Commissioner.

Last updated: 22 October, 2025