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## **SMP 365 Privacy Policy**

**Effective Date:** 9 May 2026

This Privacy Policy applies to products and services provided by SMP 365 SAAS Pty Ltd (“SMP 365”, “we”, “our”, or “us”) through the SMP 365 software ecosystem hosted within Microsoft technologies including Microsoft 365, SharePoint Online, Microsoft Azure, and related Microsoft cloud services.

### **Systems Covered**

- Permit to Work
- Learning Management System (LMS)
- ICAM + AI Assisted Investigations
- Contractor Management
- Risk Management
- Incident Management
- Environmental Management System (EMS)
- Psychosocial Risk Management
- Hazardous Goods Management
- Travel Management
- Action Management
- Dashboards & Analytics
- Safety Mobile Applications

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

SMP 365 SAAS Pty Ltd is a global software company delivering Microsoft-integrated Environment, Health, Safety, Risk, and operational management solutions.

Headquartered in Western Australia, SMP 365 provides configurable enterprise systems designed to support organisations operating within recognised international and ISO-aligned management frameworks.

## **2. Information We Collect**

Depending on configuration and usage, SMP 365 systems may process training records, incident records, permits, contractor information, uploaded evidence, analytics, audit logs, and operational workflow information.

## **3. Microsoft 365 & SharePoint Hosted Data**

SMP 365 systems are designed to operate primarily within the customer's own Microsoft 365 and SharePoint environment. Customers retain control over permissions, governance, retention, and Microsoft compliance settings.

## **4. Microsoft Graph Integration**

SMP 365 may utilise Microsoft Graph APIs for workflow notifications, LMS reminders, permit communications, investigation alerts, and operational messaging. Mail.Send permissions are used solely for authorised operational communications within the customer's Microsoft environment.

## **5. Optional Azure AI Services**

Optional AI-assisted functionality may integrate with Azure OpenAI, Azure AI Speech Services, Azure Document Intelligence, and Azure Cognitive Services to support investigation assistance, summarisation, transcription, and operational insights.

## **6. AI Output Disclaimer**

AI-generated outputs are assistive only and may contain inaccuracies. Customers remain responsible for all operational decisions, investigations, and compliance obligations.

## **7. Customer Ownership of Data**

Customers retain ownership of operational records, investigations, evidence, training records, permits, and related business information stored within their Microsoft environment.

## **8. No Sale of Customer Data**

SMP 365 does not sell customer data or operational information to third parties.

## **9. Data Retention**

Retention is primarily controlled through the customer's Microsoft 365 and SharePoint configuration, including Microsoft Purview and governance settings.

## **10. Security Measures**

SMP 365 leverages Microsoft Entra ID, HTTPS encryption, SharePoint permissions, Azure security

controls, and audit logging mechanisms.

### **11. International Data Processing**

Data may be processed within Microsoft Azure regions selected by the customer. Customers remain responsible for selecting compliant hosting regions.

### **12. Third-Party Services**

SMP 365 systems may integrate with Microsoft 365, SharePoint Online, Microsoft Azure, Microsoft Graph, and Azure AI Services.

### **13. Privacy & Regulatory Compliance**

SMP 365 seeks to align with international privacy principles including the Australian Privacy Act 1988 (Cth) and associated Australian Privacy Principles (APPs).

### **14. Changes to this Privacy Policy**

SMP 365 may update this Privacy Policy periodically to reflect platform, regulatory, and operational changes.

### **15. Contact Information**

SMP 365 SAAS Pty Ltd

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