



Relationship to the main Privacy Notice

This Addendum supplements the Senso.cloud Privacy Notice and applies to Australian customers and end-users, including K-12 schools and school systems, using Senso.cloud services in Australia. Where this Addendum is inconsistent with the main Privacy Notice, this Addendum governs for Australian tenancies. The UK/EU GDPR provisions in the main Privacy Notice remain applicable to UK and European customers and are retained for transparency.

Who we are in Australia

Senso.cloud is provided in Australia by Renato Software Pty Ltd (ABN 23 678 773 012), operating together with Renato Software Ltd. For Australian schools, we comply with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs). Depending on the feature and processing activity, we may act on a customer's instructions for Service Data in a processor-like service provider role, or as controller for our own Collected Data, such as account administration and website analytics.

Data residency and sovereignty

All Australian customer Service Data is provisioned and stored in Microsoft Azure Australia regions, Sydney, under the customer's Australian tenancy.

Backups and disaster recovery replicas for Australian tenancies are retained within Australia.

Authorised support access is time-bound, least-privilege and logged. Where such access constitutes an overseas disclosure under APP 8, we take reasonable steps to ensure APP-consistent handling.

Mapping GDPR concepts to Australian equivalents

GDPR CONCEPT	AUSTRALIAN EQUIVALENT	MEANING
Controller	APP entity / organisation	Decides the purposes for handling personal information. For Service Data, the customer school generally plays this role and Senso.cloud follows

		customer instructions.
Processor	Service provider - no exact APP equivalent	Handles information on the school's behalf. Senso.cloud plays this role for Service Data.
Personal Data	Personal information	Information or opinion about an identified or reasonably identifiable individual.
Special category data	Sensitive information	Includes health, biometric and other sensitive information with higher protections under APP 3 and APP 6.
DPIA	PIA / privacy impact assessment	We support schools that choose or are required to perform privacy impact assessments.
International transfer mechanisms	APP 8 - cross-border disclosure	We take reasonable steps to ensure overseas recipients do not breach the APPs.
Breach notification under GDPR Articles 33-34	Notifiable Data Breaches scheme	We assess eligible data breaches and notify customers and the OAIC where required.

Legal bases and choices in Australia

Under the APPs, collection under APP 3 and use and disclosure under APP 6 govern how personal information is handled, with consent required in certain cases, including some sensitive information. For Collected Data obtained through our sites and services, we collect only what is reasonably necessary for our functions and activities and use it for the purposes described in the main Privacy Notice. Where consent is required, we will seek it and consent may be withdrawn at any time.

Cross-border disclosures and subprocessors

We primarily process Australian Service Data in Australia. Where we engage specialist support providers or vendors overseas, we take reasonable steps under APP 8 to ensure recipients handle information in a manner consistent with the APPs, including through contractual obligations and security controls.

Core hosting for Australian customers is in Microsoft Azure Australia regions. Where ancillary services involve overseas components, we apply data minimisation, role-based access and auditing.

Security in Australia

The platform security measures described in the main Privacy Notice apply to Australian tenants. These include TLS encryption in transit, encryption at rest, multi-factor authentication, least-privilege access, audited access, Microsoft Defender / Threat Detection, code integrity controls, and just-in-time support access authorised by the customer and fully logged.

Privacy rights in Australia

The rights described in the main Privacy Notice align with APP 12, access to personal information, and APP 13, correction of personal information. Australian customers and individuals can contact us to exercise these rights for

Collected Data. For Service Data, individuals should contact their school or relevant customer organisation; we will assist the customer as required by our agreements and applicable law.

Schools, children and consent

Australia has no single statutory age threshold for consent. Whether a young person can give valid consent depends on capacity and context. We rely on the school and, where relevant, the parent or guardian, to provide appropriate notices and consents and to instruct us on access, use and disclosure.

Breach notification - NDB scheme

If we become aware of a data incident that is likely to result in serious harm and meets the criteria for an eligible data breach under the Notifiable Data Breaches scheme, we will investigate, mitigate and notify the customer school and the Office of the Australian Information Commissioner (OAIC) where required.

GDPR context for Australian schools

Senso.cloud maintains GDPR-aligned controls across the platform, including access governance, encryption, audit logging and incident response. Many Australian schools regard GDPR-aligned controls as meeting or exceeding local baseline expectations. By operating Australian tenancies in Australian Azure regions while maintaining GDPR-grade controls, we provide protections that meet or surpass common Australian school expectations.

Contacting us in Australia

For privacy questions specific to Australia, customers and individuals can contact us through the Senso.cloud website or their account team. We will coordinate with our UK privacy team as needed and respond in line with Australian law.

OAIC contact information is available at <https://www.oaic.gov.au/>.

Australian contact and entity details

ENTITY	DETAILS
Australian entity	Renato Software Pty Ltd, ABN 23 678 773 012
Australian office	Level 5, 600 Bourke Street, Melbourne VIC 3000
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