



# SHAFFI IT SOLUTIONS

## Privacy Policy

**Version:** 1.0

**Effective date:** 30/04/2026

**ABN:** 52 110 894 221

**Division:** Shaffi IT Solutions

**Parent Company:** Shaffico Pty Ltd

**Contact:** [contact@shaffiit.tech](mailto:contact@shaffiit.tech)

**Website:** [www.shaffiit.tech](http://www.shaffiit.tech)

### Section 1: Introduction

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This Privacy Policy applies to **Shaffi IT Solutions**, a division of Shaffico Pty Ltd, located at 3 Butler Drive, Hendon SA 5014 ("**Shaffi IT**", "we", "us", or "our"). **Shaffi IT** provides IT services to small businesses and individual consumers, including:

- Web Development
- Software Development
- Consulting
- Cybersecurity
- Systems & Software integrations
- UI/UX Design
- Ongoing Support and Maintenance
- Graphic Design
- Content Creation
- Digital Marketing

This policy explains how we collect, use, store, and disclose personal information in connection with the delivery of our services, in accordance with the **Privacy Act 1988 (Cth)** and the **Australian Privacy Principles (APPs)**. This is our divisional policy and should be read alongside the **Shaffico Pty Ltd** Corporate Privacy Policy, available at [www.shaffico.com](http://www.shaffico.com).

By engaging **Shaffi IT** for services, you acknowledge that your personal information will be handled in accordance with this policy.

### Section 2: What Personal Information We Collect

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#### 2.1 Client Information

When you engage **Shaffi IT** directly or enquire about our services, we may collect the following personal information:

- Your full name and business name (if applicable)
- Contact details including email address, phone number, and postal or business address
- Billing information such as invoicing details (we do not store payment card details directly)
- Project requirements, briefs and communication related to service delivery
- Login credentials or access details provided for the purpose of delivering agreed services (e.g., hosting access, CMS credentials, third party platform access)
- Any other personal information you voluntarily provide while engaging with us.

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## 2.2 End-User Information Collected on Behalf of Clients.

As part of delivering services such as web development, software development, and digital solutions, **Shaffi IT** may build, configure, or maintain systems that collect personal information from your end-users (for example, contact forms, user accounts, or e-commerce functionality). In these cases, **Shaffi IT** acts as a service provider processing data on your behalf. You, as the client, remain the data controller responsible for ensuring your own privacy obligations are met in relation to your end-users

**Shaffi IT** will only access end-user data to the extent necessary to deliver the agreed services and will handle such data in accordance with this policy and any applicable service agreement.

## 2.3 Dual Role Engagements – Website Build with Ongoing Maintenance or Cybersecurity

Where **Shaffi IT** is engaged to build both a digital solution (such as website or application) and provide ongoing services in connection with that solution – such as ongoing maintenance, hosting management, or cybersecurity – the nature of **Shaffi IT**'s role in relation to personal information may extend beyond that of a service provider.

In these arrangements, and only where this has been explicitly agreed in writing as part of the engagement, **Shaffi IT** may act as a data controller in respect of the personal information it independently accesses, manages, or processes to fulfil its ongoing obligations. This includes circumstances where **Shaffi IT** retains system access, manages user data, monitors for security incidents, or makes operational decisions about how personal information is handled within the system.

Where this dual-role arrangement applies, **Shaffi IT** will:

- Clearly document and agree the scope of **Shaffi IT**'s data controller responsibilities in the relevant service agreement or statement of work prior to commencement.
- Handle all personal information accessed in that capacity in accordance with this Privacy Policy and the Australian Privacy Principles.
- Notify the client of any personal information accessed beyond the agreed scope, and obtain consent before doing so, where reasonably practicable.
- Securely relinquish or transfer all access and associated personal information upon termination of the engagement.

Where no such written agreement exists, **Shaffi IT**'s role defaults to that of a service provider as described in [Section 2.2](#), and the client remains the data controller.

## 2.4 Sensitive Information

**Shaffi IT** does not seek to collect sensitive information (as defined under the Privacy Act 1988) unless it is directly necessary for a specific engagement and you have provided explicit consent. If a project requires handling sensitive information, this will be identified and agreed upon in writing prior to commencement.

## Section 3: How We Collect Personal Information

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**Shaffi IT** collects personal information through the following means:

- Direct enquiries submitted via our website contact form at [www.shaffiit.tech](http://www.shaffiit.tech) or by email to [contact@shaffiit.tech](mailto:contact@shaffiit.tech)
- Onboarding processes when you engage us for a service, including intake forms and project briefings.
- Ongoing communications during a service engagement, including email, phone, and messaging platforms
- Access credentials and system permissions you provide to enable us to deliver agreed services
- In-person meetings or consultations.

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We do not collect personal information through tracking cookies, behavioural analytics, or passive monitoring on our own website. Where we build or manage systems for clients that collect user data, collection practices are governed by the client's own privacy policy.

## Section 4: Why We Collect Personal Information

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Shaffi IT collects and uses personal information for the following purposes:

- To respond to enquiries and provide quotes or proposals for services
- To deliver the services you have engaged us to provide, including all associated technical, creative, and consulting work.
- To communicate with you throughout a project, including progress updates, approvals and support.
- To provide ongoing support and maintenance services, including monitoring, updates, and technical assistance under agreed service arrangements.
- To manage invoicing, payments, and contractual obligations
- To fulfil cybersecurity engagements, including vulnerability assessments and system access, strictly within the scope of written consent provided per agreement.
- To improve our internal processes and service quality.
- To comply with our legal and regulatory obligations.

We will not use your personal information for any purpose unrelated to why it was collected, including direct marketing, unless you have given us your explicit consent.

## Section 5: Third-Party Tools and Service Providers

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Shaffi IT uses several third-party platforms and tools while delivering the services. These may process client or end-user data as part of normal operations. Additional tools may be used depending on project requirements and will be disclosed to you at the time of engagement where relevant.

We take reasonable steps to ensure that any third-party service providers we use are bound by appropriate privacy and confidentiality obligations. Where a third-party provider is based overseas or operates under a foreign jurisdiction, we will comply with our obligations under **APP 8 of the Privacy Act 1988** before disclosing your personal information to that provider

## Section 6: Cybersecurity Engagements

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Where Shaffi IT is engaged to perform cybersecurity services – including but not limited to penetration testing, vulnerability assessments, security audits, or access to client systems and networks – all such activities will only be conducted under explicit written consent provided by the client prior to commencement.

The scope, limitations, and handling of any data encountered during cybersecurity engagement will be treated with the utmost confidentiality, accessed only to the minimum extent necessary, and will not be retained beyond the completion of the engagement unless otherwise agreed in writing.

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## Section 7: How We Store and Protect Personal Information

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**Shaffi IT** takes reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, modification, or disclosure. Our security measures include restricting access to personal information to staff and contractors who require it to perform their duties, using secure communication channels for sensitive project information, and maintaining secure credentials management practices.

Client-provided credentials and access details are used solely for the purpose for which they were provided. Where **Shaffi IT** is engaged for ongoing support and maintenance services, credentials and access details necessary to perform those services will be retained for the duration of the support arrangement and securely disposed of upon termination of that arrangement.

We retain information only for as long as necessary for the purposes for which it was collected, or as required by law. When personal information is no longer needed, it is securely deleted or de-identified.

## Section 8: Disclosure of Personal Information

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**Shaffi IT** does not sell, rent or trade your personal information. We may disclose personal information in the following circumstances:

- To **Shaffi IT** staff and contractors who require it to deliver the agreed services
- To third-party platforms and tools used in delivering your project, as described in [Section 5](#)
- To the parent company Shaffico Pty Ltd for internal administrative and operational purposes.
- Where we are required or authorised to do so by law, a court order, or a government or regulatory authority.

We do not disclose personal information to overseas recipients beyond what is inherent in the use of third-party platforms described in [Section 5](#). Where such disclosure occurs, we will take reasonable steps to ensure that the recipient handles the information in accordance with the APPs.

## Section 9: Your Rights Under the Australian Privacy Principles

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You have the right to request access to the personal information **Shaffi IT** holds about you and to request that we correct any information is inaccurate, out of date, incomplete, or misleading. To make such request, please contact us using the details in [Section 11](#).

We will respond to access and correction requests within a reasonable timeframe and at no charge. In limited circumstances, we may decline a request where APPs permit us to do so, in which case we will provide written reasons for the decision.

## Section 10: Complaints

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If you believe **Shaffi IT Solutions** has handled your personal information in a manner that does not comply with the **Privacy Act 1988 (Cth)** or the **Australian Privacy Principles**, you are encouraged to contact us in the first instance so we can attempt to resolve your concern promptly.

If you are not satisfied with our response, you may lodge a complaint with the **Office of the Australian Information Commissioner** (OAIIC) at [www.oaic.gov.au](http://www.oaic.gov.au) or by calling 1300 363 992

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# SHAFFI IT SOLUTIONS

## Section 11: Contact Us

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For any privacy related enquiries, access requests, or complaints regarding **Shaffi IT**, please contact us at

### Shaffi IT Solutions

Address: 3 Butler Drive, Hendon SA 5014, Australia

Email: [contact@shaffiit.tech](mailto:contact@shaffiit.tech)

Web: [www.shaffiit.tech](http://www.shaffiit.tech)

For matters relating to the parent company, please refer to the Privacy Policy at [www.shaffico.com](http://www.shaffico.com), or a copy is available upon request at [contact@shaffico.com](mailto:contact@shaffico.com).

## Section 12: Notifiable Data Breaches

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**Shaffi IT**, as a division of Shaffico Pty Ltd, is subject to the **Notifiable Data Breaches (NDB)** scheme under **Part IIIC of the Privacy Act 1988 (Cth)**. Where a data breach is assessed as likely to result in serious harm, **Shaffi IT** will notify the **Office of the Australian Information Commissioner (OAIC)** and all affected individuals as soon as practicable and without undue delay. Notifications will include the nature of the breach, the types of personal information involved, and recommended steps affected individuals should take to protect themselves.

**Shaffi IT** is committed to responding to data breaches promptly and responsibly. In the event of a suspected or confirmed data breach involving personal information we hold, we will take immediate action to contain the data breach, assess the nature and extent of the information involved, and determine whether the breach is likely to result in serious harm to any affected individuals.

**Shaffi IT** will notify affected clients of any breach involving their data or their end-user's data without undue delay and will work cooperatively with affected clients to manage and mitigate any resulting harm. **Shaffi IT** maintains an internal incident response process for identifying, containing, assessing, and responding to data security incidents.

If you believe your personal information held by **Shaffi IT** has been compromised, please contact us immediately at [contact@shaffiit.tech](mailto:contact@shaffiit.tech).

## Section 13: Updates to This Policy

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**Shaffi IT** may update this Privacy Policy from time to time to reflect changes in our services, technology, legal requirements, or operational practices. The current version will always be available at [www.shaffiit.tech](http://www.shaffiit.tech). The effective date at the top of this document indicates when the policy was last revised. Material changes will be communicated to active clients where reasonably practicable.

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**Approved by:**

**Signature:**

*Sartaj Hundal*

Sartaj Hundal (Apr 30, 2026 12:42:00 GMT+9.5)

**Name (print):**

Sartaj Hundal

**Position:**

Director

**Date:**

30-Apr-2026

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