

Privacy Policy

RePass Cloud Pty Ltd

Last updated: 2026-03-07

1. Who We Are

This Privacy Policy applies to RePass Cloud Pty Ltd ("RePass Cloud", "we", "us", or "our"). It explains how we collect, use, disclose, store, and protect personal information when you interact with our websites, products, and services (the "Services").

Our actively developed and maintained enterprise SaaS product is Cinturon360. We may also operate additional websites, brands, prototypes, or legacy products. This policy applies to all Services we operate that link to this Privacy Policy.

Legacy notice: LunaVPN is not an active RePass Cloud service. The source code has been made available as open source and it is not actively maintained or operated by us.

If you do not agree with this policy, do not use the Services.

2. Roles: Controller and Processor

Depending on the context, RePass Cloud may act as:

- Data controller (for example, for account administration, billing, and operating our websites and marketing activities).
- Data processor / service provider (for example, when we process data on behalf of a business customer in enterprise SaaS products such as Cinturon360).

Business customers are typically the controller for customer content they upload to enterprise SaaS products.

3. Contact Details

RePass Cloud Pty Ltd
PO BOX 262
Bondi Junction NSW 1355
Australia

Email: hello@repasscloud.com

4. Information We Collect

We collect information from:

- You (when you create an account, use the Services, or contact support)
- Your organisation (when they provision your access)
- Your device and browser
- Service providers that help us operate the Services

4.1 Identity and Account Data

- Name
- Email address
- Organisation name and identifiers
- User identifiers and role assignments
- Authentication identifiers issued by identity providers

4.2 Authentication and Access Data

We support enterprise authentication via Microsoft Entra ID (Azure AD) and may support federated identity providers.

We may process:

- Sign-in events and timestamps
- Authentication logs
- Access tokens and session identifiers
- Multi-factor authentication status

4.3 Customer Content and Business Data

For enterprise SaaS platforms such as Cinturon360, customers may submit content that can include personal information, including:

- Traveller or employee profile details
- Business contact details
- Booking or operational data
- Communications and support context

4.4 Operational, Audit, and Security Logs

We collect operational and security telemetry including:

- IP addresses
- Authentication logs
- Application and API access logs
- Audit logs
- Error logs and diagnostic traces
- Performance telemetry

Retention policy:

- Minimum retention: 90 days
- Typical deletion: after 100 days

4.5 Device and Technical Data

- Browser type and version
- Device type and operating system
- Approximate location derived from IP
- Session metadata and performance metrics

4.6 Billing and Payment Data

If you purchase Services we process billing contact details and transaction metadata.

Payment processing may be handled by third-party providers such as Stripe. We do not store full payment card numbers.

4.7 Support and Communications

If you contact us we may collect:

- Support request content
- Contact details
- Diagnostics required to resolve issues
- Records of communications

5. How We Use Information

We use personal information to:

- Provide and operate the Services
- Authenticate users and manage access control
- Deliver support and troubleshooting
- Maintain security and detect fraud
- Monitor reliability and performance
- Comply with legal obligations
- Handle billing and administration
- Send marketing communications where permitted
- Improve and market our services

We do not sell personal information.

6. Legal Bases for Processing

Where required by law (for example GDPR), we rely on one or more of:

- Contract
- Legitimate interests
- Consent
- Legal obligation
- Vital interests

7. Hosting, Data Residency, and Infrastructure

Customer data may be hosted in different regions depending on configuration and commercial terms.

Current and planned regions include:

- Australia (Microsoft Azure)
- United States (AWS)
- European Union (Hetzner EU)

8. Cookies and Similar Technologies

We use cookies and similar technologies for:

- Authentication
- Security controls
- Preferences and settings
- Performance and reliability
- Analytics and marketing

We partner with Microsoft Clarity and Microsoft Advertising to analyse website usage and improve services.

9. Disclosure of Information

We disclose personal information only as necessary to operate the Services, including to:

- Cloud hosting providers
- Identity providers
- Payment processors
- Security vendors
- Analytics and marketing vendors
- Professional advisers
- Authorities when legally required
- Business transferees during mergers or acquisitions

10. Security

We maintain an information security program including:

- Encryption in transit and at rest
- Role-based access control
- Multi-factor authentication
- Audit logging and monitoring
- Secure development practices
- Vulnerability management

No system is completely secure and we continuously improve safeguards.

11. Data Retention

We retain personal information only as long as necessary for the purposes described in this policy.

- Security logs retained approximately 90–100 days
- Customer content retained according to customer contracts

12. Data Breach Notification

If a data breach occurs we will:

- Investigate and contain the incident
- Notify affected customers when required
- Provide information needed for regulatory obligations

13. Your Rights

Depending on jurisdiction you may have rights to:

- Access
- Correction
- Deletion
- Restriction
- Objection
- Data portability
- Withdraw consent

14. Children's Privacy

Our Services are not intended for children under 18 and we do not knowingly collect personal information from children.

15. Changes to This Privacy Policy

We may update this policy from time to time. The last updated date indicates when the policy was revised.

16. Contact

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