

PRIVACY POLICY

This Privacy Policy applies to Fintrest Pty Ltd (ABN 1160789639) ('us' 'we' or 'our').

It sets out how we collect, use, store and disclose your personal information as we are required under the Privacy Act 1988 (Cth) ('Privacy Act').

Ensuring the confidentiality and security of your personal information is important to us. Any third parties (for example, our suppliers, agents, or sub-contractors) that have access to information we collect are also bound by this Policy.

What types of information do we collect?

We collect Personal Information. Personal Information is information or an opinion about a person, which can be used to identify that person.

We collect and hold your personal information so that we can:

- Provide you with our services and information we think is relevant to you;
- Meet your needs, and review those needs as appropriate;
- Comply with our legal and regulatory obligations;
- Resolve any complaints about our existing service;
- Keep improving our offering.

Some examples of personal information are:

- Name;
- Email;
- Date of birth;
- Address; and
- Payment details.

We may use and disclose your personal information for any of these primary purposes. We may also use and disclose your personal information for secondary purposes, which are related to the primary purposes, listed above, or in other circumstances as authorised by the Privacy Act.

Sensitive information (such as your ethnicity or religious beliefs) will be used and disclosed only for the purpose for which it was provided (or a directly related secondary purpose), unless you agree otherwise or an exemption in the Privacy Act applies.

We may collect and hold personal information about (amongst other people) the following individuals:

- Users of our website;
- People who visit our website;
- Anyone who provides a service to us.

How will we collect your personal information?

We generally collect personal information directly from you. The information is collected by:

- You creating a Fintrest Account;
- You undertaking the Investment Profile Quiz or determining an Investment Objective;
- Your use of the Fintrest website;
- Any other forms we may ask you to fill out; and
- Any other interactions with you in providing you with our products and services.

We may also collect personal information about you from a third party, such as VEDA for identity verification services. Personal information about you may be collected from a party who has passed on your details to us because they think you may be interested in our services. If so, we will take reasonable steps to ensure that you are made aware of this Policy.

For marketing purposes and to improve our website and analyse traffic, we collect data sent by your web browser, for example, your IP address and your operating system. We may also use third parties to analyse traffic at our website, which may involve the use of cookies. Information collected through such analysis is anonymous.

We will not collect sensitive information about you without your consent unless an exemption in the APPs applies. These exceptions provide for collection by law or to take appropriate action in relation to suspected unlawful activity or serious misconduct.

What if you refuse to provide personal information?

Unfortunately, we cannot give you the option of using a pseudonym, or using our services if you wish to deal with us anonymously.

Who will we disclose personal information to?

We may share your personal information with:

- One of our related entities;
- Our AFSL holder;
- Service providers involved with the provision of our services to you;
- Anyone we engage with to carry out our functions and activities, this may include other organisations such as our lawyers and accountants, or anyone we require to assist us in a transfer or sale of our assets or business;
- Banks and other financial institutions who are involved in the management of our finances, regulatory bodies, government agencies, law enforcement bodies and courts;
- Third party administrators for the purpose of reporting to you, your accountant, your financial adviser or other similar party
- Anyone with whom you authorise us to share it.

If we need to share your personal information with any of these parties they may only use your personal information for the specific purpose for which we supply it to them. We will ensure that all contractual arrangements with third parties adequately address privacy issues and will make third parties aware of this Policy.

Do we send your information overseas?

Our systems use cloud storage servers that are hosted both locally and internationally. Therefore, the list of countries to which your information may be disclosed is likely to change. Where it is reasonably practicable to do so, we will update this list appropriately.

We will not share your personal information to overseas recipients without your consent unless:

- the overseas recipient is subject to a similar information privacy regime as here in Australia or
- we have taken reasonable steps to ensure that the recipient does not breach the Privacy Act, or the APPs

How do we protect your personal information?

We recognise the importance of securing your personal information. There are always risks involved when you send information by the internet. You should assess these potential risks when deciding whether to use our online services. We have implemented procedures to ensure your personal information is as safe as possible. To the extent we use paper files, they are stored in secure areas. Your personal information is generally stored in our computer database.

We keep your data safe by applying the following guidelines: encrypting passwords in our database;

- staff are required to enter a secure login and password to access client information; and
- access is limited to staff based on their role.

Do we use your personal information for direct marketing?

We may use personal information we collect from you for the purposes of direct marketing without your consent if:

- the personal information does not include sensitive information;
- you would reasonably expect us to use or share the information for the purpose of direct marketing;
- we provide a simple way of opting out of direct marketing; and
- you have not requested to opt out of receiving direct marketing from us.

We will only use information obtained from a third party for direct marketing if:

- you have consented;
- it is impracticable to obtain your consent; or
- we have provided a simple way to request not to receive direct marketing.

You have the right to request us not to use or hold your personal information for the purposes of direct marketing, or for the purposes of allowing direct marketing by other organisations.

We must process your request to not use or share your personal information within a reasonable period of time. You may also request that we tell you the source of the information. If a request is made, we must inform you of the source of the information free of charge within a reasonable period of time.

Do we use identifiers?

We only use identifiers assigned by the Government (for example, your driver's license), where it is reasonably necessary for us to do so for verification purposes.

Updates to this Policy

This Privacy Policy will be reviewed when required to take account of new laws and technology, as well as any changes to our operations and business environment.

Our Responsibilities

It is our responsibility to ensure that our employees and relevant third parties are:

- aware of the operation of this Policy;
- informed of any changes to this Policy;
- given timely and appropriate access to this Policy;
- adequately trained in relation to the handling of personal information; and
- aware that non-compliance with this Policy may lead to disciplinary action.

Any Questions, Concerns or Complaints?

If you would like further information about this Policy, or wish to make a complaint regarding our use of your personal information, you can contact us by:

- writing – Suite 3, Level 27, Governor Macquarie Tower, 1 Farrer Place, Sydney NSW 2000, Australia
- emailing – support@fintrest.com.au

If you are not satisfied with our response to your complaint, you can also refer your complaint to the Office of the Australian Information Commissioner by:

- telephoning - 1300 363 992
- writing - Director of Complaints, Office of the Australian Information Commissioner, GPO Box 5218, SYDNEY NSW 2001
- emailing – enquiries@oaic.gov.au

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