

## PRIVACY POLICY

This Privacy Policy applies to **IRISKONLINE Pty Ltd (ACN: 166 725 711)** and its affiliates ("**we**", "**us**", "**our**") and explains how we handle personal information and comply with the requirements of applicable privacy laws ("**Privacy Laws**"). If you have further questions relating to this policy, please contact us using the contact information below.

We recognise the importance of your privacy, and that you have a right to control how your personal information is collected and used.

- **Collection of personal information**
  - It is our policy to collect MINIMAL personal information from you including:
    - contact details (i.e. your name; email; profile); and
    - statistical information regarding your use of the IRIS website or App(s), including website users' IP addresses and the dates and times of visits;
  - We usually collect personal information:
    - when you submit information through the IRISKONLINE website or App(s), such as when you register your user account, retrieve log-in information, or request a new password;
    - when you submit an order form for any product provided by IRISKONLINE;
    - when you submit information through information collection pages on the IRISKONLINE website;
    - when you register for subscriptions to mail outs (including via email), newsletters, updates, or other related information/publications through the IRISKONLINE website or App(s);
    - when we provide you with services that may require us accessing information held by your Financial Advisor or Accountant or other parties;
    - when you use the IRISKONLINE website or App(s), in which case our system may automatically collect information relating to your visit to the IRISKONLINE website or App(s) - such as your IP address;
    - when you contact us (through the IRISKONLINE website or App(s), via email or phone) with queries or issues or request that we, our content providers, or associates contact you; or
    - when you participate in our promotions or competitions.
  - If you do not provide us with the information we request, we may not be able to fulfil the applicable purpose of collection, such as to supply products or services to you.
  - Where practicable, we will collect personal information directly from you. We may also collect personal information about you from third parties such as your Financial Advisor or Accountant with your authorisation.
  - If we receive information about you from someone else, we will take reasonable steps to ensure you are aware that we have collected personal information about you and the circumstances of the collection.
- **Use and disclosure of personal information**
  - We will only use and disclose your personal information in accordance with Privacy Laws and this Privacy Policy.
  - In the normal course of business, our main purposes for collecting, holding, using and disclosing personal information are the following:
    - to supply products or services to our customers such as yourself;
    - to obtain products and services from our suppliers;

- to respond to enquiries from existing or prospective customers seeking information about our products or services;
    - to improve the products and services that we supply to you;
    - to carry out processes associated with the services we provide, including fraud screening, identity verification, electronic funds transfers and account monitoring;
    - to conduct competitions and trade promotions;
    - to comply with legislative and our policy requirements;
    - for the purposes of conducting analysis about the deployment and use of our products and services and the technology that supports our products and services, in Australia;
    - to provide information to, and respond to queries from, shareholders or suppliers.
  - We generally explain at the time we collect personal information how we will use or disclose that information. We will only use or disclose personal information for a purpose other than for which it was collected or a related purpose if you have consented to such different use or disclosure or such use or disclosure is otherwise allowed by the Privacy Laws.
  - In carrying out our business, it may be necessary to share information about you with and between our affiliates and organisations that provide services to us.
  - We may aggregate information that we collect and use it for purposes outside the scope of this Privacy Policy. Any aggregated data used for those purposes will have all personally identifiable information removed.
- **Service providers**
  - We use service providers to help us provide our products and services, and to carry out our business operations. This includes independent contractors and consultants, off-site security storage providers, and providers of electronic fund transfer services, and identity verification services.
  - You agree that we may provide your personal information to these service providers to use in connection with the supply of services to you and that they may provide us with your personal information to enable us to provide services to you.
- **Direct marketing**
  - We may use personal information you have provided to us to send you information about content available on the IRISKONLINE website or App(s), new or updated content, special offers, promotions or competitions or other items or material that we believe you may be interested in.
  - We will only contact you in this way if you have consented to receive such messages.
  - If you are receiving promotional information from us and do not wish to receive this information any longer, please contact us directly, or use the unsubscribe facilities included in our marketing communications.
  - If you have an account with IRISKONLINE, we will use your personal information to send you messages containing important information about your account. These messages are an important part of the service that we provide to you and will be sent to you as long as you hold an account with us. Customers with an account cannot opt-out of receiving these messages.
- **Our website privacy practices**
  - We may use cookie technology on our websites to provide information and services to web site visitors. Cookies are pieces of information that a website transfers to your computer's hard disk for record keeping purposes and are a necessary part of facilitating online transactions. Most web browsers are set to accept cookies.

Cookies are useful to estimate our number of members and determine overall traffic patterns through our websites.

- If you do not wish to receive cookies, you may set your browser to refuse cookies. This may mean you will not be able to take full advantage of the services on the website.
- **Links to other websites**
  - Our websites may contain links to third party websites. These linked sites are not under our control and we are not responsible for the content of those sites nor are those sites subject to our Privacy Policy.
  - Before disclosing your personal information on any other website we recommend that you examine the terms and conditions and Privacy Policy of the relevant site.
  - IRISKONLINE is not responsible for any practices on linked websites that might breach your privacy.
- **Employee information**
  - This Privacy Policy does not apply to the handling of information about employees by us. For information about our practices relating to employee information please contact [support@iriskonline.com](mailto:support@iriskonline.com).
- **Accessing and correcting the information we keep about you**
  - The My Profile tab on your IRISKONLINE dashboard displays personal information you supplied on registration. You are free to update that information at any time.
  - If at any time you want to know exactly what other personal information we hold about you, you are welcome to request access to your record by contacting us at [support@iriskonline.com](mailto:support@iriskonline.com). Our file of your information will usually be made available to you within 21 days.
  - If at any time you wish to change personal information that we hold about you because it is inaccurate or out of date, please contact us at [support@iriskonline.com](mailto:support@iriskonline.com) and we will amend this record. If you wish to have your personal information deleted, please let us know in the same manner as referred to above and we will take all reasonable steps to delete it unless we need to keep it for legal reasons.
- **Storage and security of your personal information**
  - We will endeavour to take all reasonable steps to keep secure any information which we hold about you, and to keep this information accurate, up to date and complete. Your information is stored on secure servers that are protected in controlled facilities. We require our employees and data processors to respect the confidentiality of any personal information held by us.
- **Retention of information**
  - When we no longer need to use your information, or are no longer required to retain it by law, we will take steps to properly de-identify or destroy it.
- **Contacting Us**
  - If you have any concerns or complaints about how we handle your personal information, or if you have any questions about this policy, please contact us:

IRISKONLINE Pty Ltd  
Ground Floor  
430 Little Collins Street  
Melbourne, VIC, 3000

- In most cases we will ask that you put your request in writing to us. We will investigate your complaint and will use reasonable endeavours to respond to you in writing within 30 days of receiving the written complaint. If we fail to respond to

your complaint within 30 days of receiving it in writing or if you are dissatisfied with the response that you receive from us, you may have the right, depending on the jurisdiction, to make a complaint to the applicable regulator.

- **Future changes**

- We reserve the right to change this Privacy Policy at any time and notify you by posting an updated version of the policy on its website. If at any point we decide to use personal information in a manner materially different from that stated at the time it was collected we will notify users by email or via a prominent notice on our website, and where necessary we will seek the prior consent of our users.