

## Privacy Policy

This Privacy Policy applies to OpenDirector Pty Ltd (ABN 11 632 377 809) 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.

### 1. Collection of personal information

- 1.1. We collect personal information from user (existing and prospective), prospective employees and other individuals for various business and other purposes listed in this privacy policy.
- 1.2. The types of personal information we will collect from you will depend on the circumstances in which that information is collected. It may include:
  - 1.2.1. contact details (i.e. your name, address, email, phone and facsimile details);
  - 1.2.2. information required for you to open an account with us or otherwise do business with us including bank account details, and any other relevant financial information;
  - 1.2.3. statistical information regarding the use of the OpenDirector websites or Apps, including website users' IP addresses and the dates and times of visits; and
- 1.3. We usually collect personal information through:
  - 1.3.1. when you submit information through the OpenDirector websites or Apps, such as when you register a user account, retrieve log-in information, or request a new password;
  - 1.3.2. when you submit an application form for a product provided by OpenDirector;
  - 1.3.3. when you submit information through information collection pages on the OpenDirector websites;

- 1.3.4. when you register for subscriptions to mail outs (including via email), newsletters, updates, or other related information/publications through the OpenDirector website(s) or App(s);
- 1.3.5. when we provide you with services. This may include us accessing information held by your financial institution or other third parties;
- 1.3.6. when you use the OpenDirector website(s) or App (s), in which case our system may automatically collect information relating to your visit to the OpenDirector website(s) or App(s), such as your IP address;
- 1.3.7. when you contact us (through the OpenDirector website(s) or App(s), via email or phone) with queries or issues or request that we, our content providers, or associates contact you;
- 1.3.8. when you make purchases, contributions or donations using cards linked to your user account; or
- 1.3.9. when you participate in our promotions or competitions.
- 1.4. If you do not provide us with the information we request, we may not be able to fulfill the applicable purpose of collection, such as to supply products or services to you or to assess your application for employment.
- 1.5. 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 institution 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.

## **2. Use and disclosure of personal information**

- 2.1. We will only use and disclose your personal information in accordance with Privacy Laws and this Privacy Policy.
- 2.2. Our main purposes for collecting, holding, using and disclosing personal information are the following:

- 2.2.1. to supply products or services to our customers;
  - 2.2.2. to respond to enquiries from existing or prospective users seeking information about our products or services;
  - 2.2.3. to improve the products and services that we supply to you;
  - 2.2.4. to carry out processes associated with the services we provide, including fraud screening, identity verification, electronic funds transfers and account monitoring;
  - 2.2.5. to enforce agreements between you and OpenDirector;
  - 2.2.6. to conduct competitions and trade promotions;
  - 2.2.7. to comply with legislative and our policy requirements;
  - 2.2.8. 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 or elsewhere;
  - 2.2.9. to provide information to, and respond to queries from, shareholders or suppliers.
- 2.3. 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.
- 2.4. 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.
- 2.5. 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.

### **3. Service providers**

- 3.1. 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. You agree that We may provide your personal information when it is necessary for them to complete their work.

#### **4. Our website privacy practices**

4.1. We sometimes 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.

4.2. If you do not wish to receive any 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.

#### **5. Links to other websites**

5.1. 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. OpenDirector is not responsible for any practices on linked websites that might breach your privacy.

#### **6. Accessing and correcting the information we keep about you**

6.1. If at any time you want to know exactly what personal information we hold about you, you are welcome to request access to your record by contacting us at (email address). Our file of your information will usually be made available to you within 21 days.

6.2. 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 (email address) 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.

## **7. Storage and security of your personal information**

7.1. 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.

## **8. Retention of information**

8.1. 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.

## **9. Contacting Us**

9.1. 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:

9.1.1.1. OpenDirector Pty Ltd  
C/O Compliance Officer  
28 Fletcher Street  
Sydney, NSW, 2025

9.2. 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.

## **10. Future changes**

10.1. 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.