

# Auctus - Privacy Policy

November 2020

## 1. Introduction

Auctus Investment Group Limited and all related entities (together "Auctus") recognize and appreciate the importance of protecting your privacy and securing your personal information. In implementing this policy Auctus are bound by the 13 Australian Privacy Principles and the Privacy Act 1988.

Auctus will, from time to time, review and update this Policy in accordance with product and service updates and incorporating regulatory, legislative and technology changes.

## 2. Collection of personal information

"Personal Information" is any information or opinion about a person, from which that person may be identified. Personal information can range from sensitive and confidential information to information that is publicly available. The definition also makes clear that information can be personal information even if it is incorrect.

### What Personal Information do we collect?

Auctus collect Personal Information as required by law to verify your identify (in accordance with the AML/CTF Legislation), to allow us to conduct our business functions and to market our products. Information we may collect includes (but is not limited to):

- (a) your name
- (b) date of birth
- (c) contact details (including personal or work email and postal addresses)
- (d) Credit card,
- (e) bank account
- (f) Tax File Number (TFN) and,
- (g) Holder Identification Number (HIN) details

## When do we collect Personal Information?

Personal information may be collected when you:

- (a) Register for our products or services;
- (b) Visit our website;
- (c) Fill in an application form for our Funds;
- (d) Request information from us or about us;
- (e) Provide feedback;
- (f) Complete surveys;
- (g) Submit information to us through the website; or
- (h) Contact us by telephone, email, post or in person.

### ***Personal information collected via our website, solution or app***

We will not collect any personal information about users of our website except when they knowingly provide it or otherwise in the situations described in cause 2 above.

## 3. Collecting Information from third parties

We may also collect Personal Information about you via third parties, such as those that facilitate the use or communication of our products, services, program or activities (as the case maybe) Services. However, we will only collect your personal information from third parties if it is not reasonable or practical to collect this information directly from you.

### ***Click Stream Data***

When you visit and browse our website, solution or app, our website host and other third parties engaged by us may collect personal information for statistical, reporting and maintenance purposes.

Subject to this Privacy Policy, the personal information collected by our website host will not be used to identify you. The information may include:

- (a) The number of users visiting our website, solution or app and the number of pages viewed;
- (b) The date, time and duration of a visit;
- (c) The IP address of your computer; or
- (d) Location of the user;
- (e) The path taken through our website, solution or app

Our website host uses this information to administer and improve the performance of our website.

#### **4. How we use the Personal Information**

Where we collect Personal information about you, we may use this information for our organisation's primary functions and services which may include, but is not limited to :

- (a) Provide you with information or services you have requested;
- (b) Promote and market our Services to you;
- (c) Personalise and customize your experiences on our website;
- (d) Communicate with you;
- (e) Provide you with ongoing information about us in which you may be interested;
- (f) Conduct research for the purposes of improving our existing services or created new services; and
- (g) Give you the opportunity to receive emails and other advertising material

If we collect and use your personal information for purposes not listed above, we will make it known to you at the time we collect and/or use your personal information.

If you choose not to provide your personal information to us for the purposes set out in this privacy policy, we may not be able to undertake certain activities for you.

#### **5. Disclosing your Personal Information**

Depending on the nature of your engagement with us, we may disclose your personal information to our related entities or Services partners.

We may also disclose your personal information to our website, host, software application providers or infrastructure providers in certain limited circumstances, for example when our website, solution or app experiences a technical problem or to ensure that it operates in an effective and secure manner, cooperating with law enforcement authorities in the investigation of suspected criminal violations or if there has been a breach of this privacy policy (including in the event of a complaint involving you, gathering information from you and examining your transmissions and materials on services or any networks).

Personal Information will be stored and hosted in Australia

## **6. Marketing**

We may use your personal information to provide you with promotional material that may benefit you or other services offered by us. If you do not wish to receive such material, we provide you with the ability to unsubscribe from these communications. You can contact our support team at [enquiries@auctusinvest.com](mailto:enquiries@auctusinvest.com) to request for you to be removed from our marketing communication.

Unless otherwise specified in this privacy policy, we will not disclose any of your personal information to any other organisation unless the disclosure is required by law or is otherwise permitted by the National Privacy Principles.

## **7. How do I access my Personal Information?**

Subject to some exceptions, you are entitled to access personal information that we hold about you. If you request access to your personal information, we will be required to verify your identity before granting your request. Where your request for personal information would unreasonably impact upon the privacy of others or is not otherwise permitted under the National Privacy Principles, Auctus have the right to refuse this request. If we refuse your request to access your personal information, we will provide you with reasons for the refusal.

A request for access can be made by contacting our privacy office as specified in section 9.

## **8. Updating, storage and security of Personal Information**

We take reasonable steps to ensure the personal information we collect, use or disclose is:

- (a) Accurate, completed and up to date;
- (b) Protected from misuse and loss;
- (c) Protected from unauthorized access, modification or disclosure; and
- (d) Deleted if it is no longer required by Law, for our business purpose or functions.

## Updating your Personal Information

Auctus provide the facility to update some of your personal details via your account. However, in some instances we will request the update of your personal details in writing and may also require you to verify your identity. This is to ensure all requests for updates to personal information is received by the account owner and to assist in the protection of your personal information.

If we find that we have no further need for your personal information we may remove it from our systems. We welcome any changes to your details in order to keep our records up to date.

To update your personal information please contact [enquiries@auctusinvest.com](mailto:enquiries@auctusinvest.com)

## 9. Concerns regarding your personal information or this privacy policy.

If you feel that your privacy has not been respected or that we have conducted ourselves inconsistently with this privacy policy in respect of your personal information, or for any other queries, or communication in relation to this privacy policy, please attention your concerns to our Compliance Officer via:

Email [enquiries@auctusinvest.com](mailto:enquiries@auctusinvest.com) or

Write to: Compliance Officer, Lvl 7, 90 Collins Street Melbourne VIC 3000

## 10. Managing your Complaint

If you make a compliant, Auctus will confirm receipt of your compliant within 48 hours and will aim to resolve your complaint within 10 working days. However, where this is not possible, we will contact you within this time frame to provide you with an update and an expected time frame for the issue to be resolved.

If you are not satisfied with our final response, or if you have not received a response after 45 days, you may lodge a complaint with The Australian Financial Complaints Authority via:

Online: [www.afca.org.au](http://www.afca.org.au) Email: [info@afca.org.au](mailto:info@afca.org.au)

Phone: 1800 931 678 (free call)<sup>1</sup>

Mail: Australian Financial Complaints Authority GPO Box 3, Melbourne VIC 3001

*Time limits may apply to complain to AFCA and so you should act promptly or otherwise consult the AFCA websites to find out if or when the time limit relevant to your circumstances expire.*