# **Privacy Policy**



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#### 1. Introduction

- 1.1. The FinTip app and website is proudly owned and operated by Bodhi Tree Capital Pty Limited ACN: 658 961 2854 ('us', 'we' and 'our').
- 1.2. We are committed to respecting your privacy. Our Privacy Policy sets out how we collect, use, store and disclose personal information.

## 2. Updates

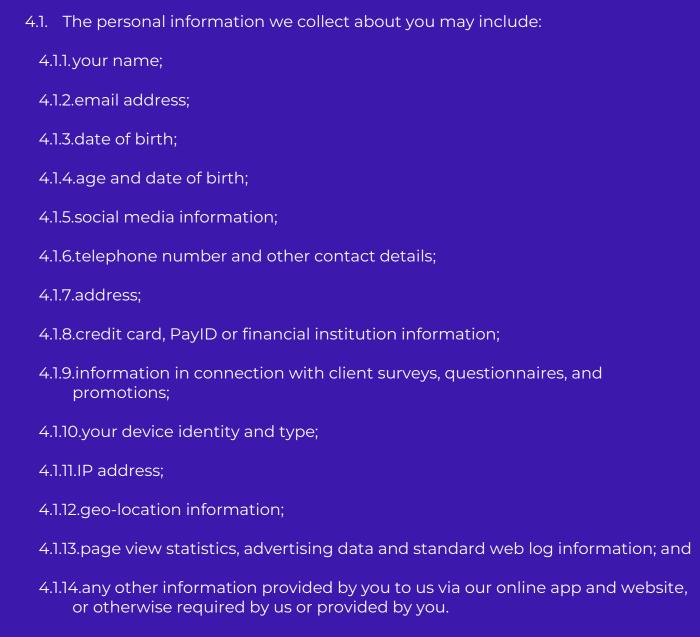
- 2.1. We may change our Privacy Policy occasionally. When we do we will let you know by posting the updated Privacy Policy on our website or by any other method we consider reasonable in our discretion, such as sending you an email if we have your email address.
- 2.2. Please keep an eye out for any changes. Your continued use of the website and app after we have updated the Privacy Policy means you agree to the new Privacy Policy.

#### 3. Personal Information

- 3.1. We are bound by the Australian Privacy Principles ('APPs') contained in the Privacy Act 1988 (Cth) ('Privacy Act').
- 3.2. 'Personal information' is defined in the Privacy Act to mean any information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether or not the information or opinion is recorded in a material form. For example, this

- may include your name, age, gender, postcode and contact details. It may also include financial information, including your credit card information.
- 3.3. By providing personal information to us, you consent to our collection, use and disclosure of your personal information in accordance with this Privacy Policy.

## 4. Types of Personal Information we may collect



## 5. How we collect personal information

- 5.1. We may collect personal information either directly from you, or from third parties, including where you:
  - 5.1.1. register as a user on our app;
  - 5.1.2.participate in our fantasy trading competitions;

- 5.1.3.contact us through our app and website, communicate with us via email, telephone, SMS, social media (such as LinkedIn, Facebook, or Twitter): or
- 5.1.4.interact with our social media applications, services, content, and advertising, invest in or purchase our business, or enquire as to a potential investment or purchase of our business.
- 5.2. We may also collect personal information from you when you use, access, or otherwise interact with our website, or app. This may be done through the use of web analytics tools (such as Google Analytics), 'cookies' or other similar tracking technologies that allow us to track and analyse your website usage. Cookies are small files that store information on your computer, mobile phone or other device and enable the creator of the cookie to identify when you visit different websites. If you do not wish information to be stored as a cookie, you can disable cookies in your web browser.
- 5.3. We may also collect personal information from you when you apply for a job or position with us (including your name, contact details, working history and relevant records checks) from any recruitment consultant, your previous employers and others who may be able to provide information to us to assist in our decision whether or not to make you an offer of employment or engage you under a contract.
- 5.4. This Privacy Policy does not apply to acts and practices in relation to employee records of current and former employees which are exempt from the Privacy Act.

#### 6. Purposes

- 6.1. We collect, hold, use and disclose your personal information for the following purposes:
  - 6.1.1. to respond to your enquiries;
  - 6.1.2.to provide services or information to you;
  - 6.1.3.for record keeping and administrative purposes;
  - 6.1.4.to provide information about you to our contractors, employees, consultants, agents or other third parties for the purpose of providing services to you;
  - 6.1.5.to improve and optimise our service offering and customer experience;
  - 6.1.6.to pay you a monetary prize if you are a competition winner;
  - 6.1.7.to comply with our legal obligations, resolve disputes or enforce our agreements with third parties;
  - 6.1.8.to send you marketing and promotional messages and other information that may be of interest to you and for the purpose of direct marketing (in

accordance with the Spam Act and associated legislation). In this regard, we may use email, SMS, social media, or mail to send you direct marketing communications. You can opt out of receiving marketing materials from us by using the opt-out facility provided (an unsubscribe link);

- 6.1.9.to send you administrative messages, reminders, notices, updates, security alerts, and other information requested by you; and
- 6.1.10.to fulfil our corporate governance obligations or to consider or act on your offer to purchase or invest in our business; and
- 6.1.11.to consider an application of employment or a contract from you.
- 6.2. We may disclose your personal information to cloud-providers, contracts and other third parties located outside Australia. If we do so, we will take reasonable steps to ensure that any overseas recipient deals with such personal information in a manner consistent with the APPs.

### 7. Security

7.1. We take the security of our website and app very seriously. We take reasonable steps to protect information on the website and app (including personal information) from misuse, interference, and loss, as well as unauthorised access, modification, or disclosure by a number of physical, administrative, personnel and technical protective measures. However, no method of electronic storage is 100% secure. We cannot guarantee the absolute security of information on our website and app.

#### 8. Links

8.1. Our website and social media posts may contain links to other websites. Those links are provided for convenience and may not remain current or be maintained. We are not responsible for the privacy practices of those linked websites, and we suggest you review the privacy policies of those websites before using them.

## 9. Requesting access or correcting your personal information

9.1. If you wish to request access to the personal information we hold about you, please contact us using the contact details set out below including your name and contact details. We may need to verify your identity before providing you with your personal information. In some cases, we may be unable to provide you with access to all your personal information and if this occurs, we will explain why. We will deal with all requests for access to personal information within a reasonable timeframe. If you think that any personal information we hold about you is inaccurate, please contact us using the contact details set out below and we will take reasonable steps to ensure that it is corrected.

# 10.Complaints

10.1. If you wish to complain about how we handle your personal information, please contact us using the details set out below and include your name and contact details. We will investigate your complaint promptly and respond to you within a reasonable time and in accordance with our legal obligations.

#### 11. Contact Us

11.1. For further information about our Privacy Policy or practices please contact us using the details set out below:

Email: support@fintip.com.au

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