

Privacy Policy

Updated: 16 November 2023

Overview

This privacy policy ("**Privacy Policy**") sets out the basis which Fraxtor Australia Pty Ltd ("we", "us", or "our") may collect, use, hold or disclose personal information of our customers in accordance with the Privacy Act 1988 (Cth) and associated Australian Privacy Principles ("**Privacy Act**") and other applicable data protection laws. This Privacy Policy applies to the way we use, collect, hold and disclose your personal information including personal information in the possession of, or shared with, organisations which we have engaged to collect, use, disclose or store personal information for our purposes. "**Personal information**" is defined in the Privacy Act as 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 the information or opinion is recorded in a material form or not.

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

Type of Personal Information Collected

1. Depending on the nature of your interaction with us, some examples of personal information which we may collect from you include but are not limited to:
 - a) Identity and Contact information, which includes your name, passport number, telephone number, mailing address, email address, images of your passport or identification documents, date of birth, nationality, gender, marital status, photographs and other audio-visual information;
 - b) Employment and Financial Information, which includes your financial position, status, history or bank account information;
 - c) Transaction information, which includes details about payments to and from your accounts with us;
 - d) Usage information, which includes information about how you use our website, products and/or services, including cookies, IP address, and account details;
 - e) Technical information, which includes details about the devices and technology you use including internet protocol address, your login information, and other technology on the devices you use to access our website, mobile application products and/or services; and/or
 - f) Compliance information, which includes any other personal information permitted by or required to comply with any applicable local or foreign laws, acts, regulations, licence conditions, directions, requests, requirements, guidelines, directives, codes, practice notes, and/or decisions of any national, state or local government, any agency, exchange, regulatory or self-regulatory

body, law enforcement body, court, central bank or tax revenue authority or any other authority whether in Australia or elsewhere, whether having the force of law or not (including any intergovernmental agreement between the governments or regulatory authorities of two or more jurisdictions or otherwise), as may be amended from time to time (“Applicable Laws”) and our internal control and compliance policies.

2. In the course of running our business, we do not usually collect sensitive information (i.e. information about a person's race, ethnic origin, political opinions, health, religious or philosophical beliefs, sexual preferences, genetics or criminal history). Where we do need to collect your sensitive information, unless otherwise permitted or required by law, we will collect it with your consent, and use it for the purpose for which you provided it.
3. Other terms used in this Privacy Policy shall have the meanings given to them in the Privacy Act (where the context so permits).

How Personal Information is collected

4. We may obtain personal information from the following sources, where applicable:
 - a) information provided or submitted by you through your dealings and agreements with us, which includes information provided when registering as a customer, providing information regarding any account which you may open with us, providing answers to security questions, completing any confirmations, declarations or forms, or through your utilization of any of our services, or by accessing or viewing our website and platform;
 - b) publicly available or publicly accessible sources of information such as public registers; and
 - c) such other written, electronic or verbal communications or documents delivered to us prior to and during the course of our contractual or pre-contractual dealings with you.
5. We may also collect your personal information from third parties where legally required or permitted to do so. 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.

Purposes of Collection, Use and Disclosure of Personal Information

6. We will only use and disclose your personal information in accordance with the Privacy Act.
7. We may collect, use or disclose your personal information for any or all of the following purposes:

- a) performing obligations in the course of or in connection with our provision of the goods and/or services requested by you;
 - b) verifying your identity and information;
 - c) communicating with you, including on communications on matters relevant to your relationship with or interest in us, providing you with updates on our goods and/or services, and responding to, handling, and processing queries, requests, applications, complaints, and feedback from you;
 - d) managing your relationship with us;
 - e) processing payment or transactions;
 - f) where you have provided your consent, and in accordance with Applicable Laws, sending your marketing information about our goods or services including notifying you of our marketing events, initiatives and promotions, lucky draws, membership and rewards schemes and other promotions;
 - g) complying with any Applicable Laws, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
 - h) to understand your needs and preferences;
 - i) to improve the content, appearance and utility of our website and platform, to assess and improve the products and services that you use or may use, and to manage and develop infrastructure and business operations;
 - j) to prevent, detect and investigate crime, including fraud and money-laundering, and analyse and manage other commercial risks, to detect and protect us or any third parties against negligence, fraud, theft and other illegal activities, to protect and enforce our contractual and legal rights and obligations, and to seek professional advice, including legal advice;
 - k) to conduct audits, reviews and analysis of our internal processes, for action planning and managing commercial risks, and to manage the safety and security of our premises and services (including but not limited to carrying out CCTV surveillance and conducting security clearances); and
 - l) transmitting to any unaffiliated third parties including our third party service providers and agents, and relevant governmental and/or regulatory authorities, whether in Australia or overseas including in Singapore for the aforementioned purposes.
8. The purposes listed in the above clauses may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under any contract with you). 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 an application for employment.

Disclosure and Sharing of Personal Information

9. We may disclose your personal information to our directors, officers, employees, representatives, agents or delegates or any third parties, whether located in Australia or otherwise, to carry out the purposes set out above.
10. This includes disclosing your personal information with the following:
 - a) any of our directors, officers, employees, representatives, agents or delegates;
 - b) any of our shareholders or related corporations, and any of their successors or assigns, and their directors, officers, employees, representatives, agents or delegates;
 - c) our professional advisers, consultants and auditors;
 - d) our affiliates in the course of or in connection with our provision of the services requested by you;
 - e) any service providers, agents, contractors, delegates, suppliers or third parties which we may appoint from time to time to provide us with services in connection with the website, platform or the services that we offer to you, and their directors, officers, employees, representatives, agents or delegates;
 - f) any sub-contractors which any of our service providers, agents, suppliers, delegates or contractors may appoint from time to time to provide them with services in connection with the website, platform or the services that we offer to you, and their directors, officers, employees, representatives, agents or delegates;
 - g) anyone who takes over or may take over all or part of our rights or obligations under any agreement we have with you, or anyone to whom any agreement we have with you (or any part thereof) is transferred to or may be transferred to;
 - h) any person who we believe in good faith to be your legal advisers or other professionals;
 - i) any relevant governmental or regulatory authority, in so far as we need to do so to keep to any Applicable Laws, or which we in good faith believe that we should keep to;
 - j) pursuant to a request by any relevant governmental or regulatory authority (regardless of the reason for such request and whether such request is exercised under a court order or otherwise);
 - k) parties which assist us in carrying out the purposes laid out above in this Privacy Policy; and

- l) any person to whom we are under an obligation to make disclosure as required by any Applicable Laws, provided that in the case of disclosures under any of the circumstances in (a) to (d), we shall procure that the recipient is subject to the same or substantially similar obligations to safeguard your privacy as are set out in this Privacy Policy.

Third Party Information

11. Where you disclose personal information of other individuals to us, you warrant that such individuals have consented to us collecting, using and/or disclosing such personal information for:
 - a) the relevant purpose for which you made the disclosure or as was notified to you at the relevant time; and
 - b) the other purposes as described above in this Privacy Policy.

Access to and Correction of Personal Information

12. If you wish to make:
 - a) an access request for a copy of the personal information we hold about you or information about the ways in which we use or disclose your personal information;
 - b) a correction request to edit any of your personal information we hold about you; oryou may submit a written or email request to our Privacy Officer at the contact details provided below.
13. Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.
14. We will respond to your request as soon as reasonably possible and generally within thirty (30) days. Should we be unable to respond to your request within thirty (30) days, we will inform you in writing within that thirty (30) days of when we will be able to attend to your request and the reason for the delay. If we are unable to provide you with any personal information or to make a correction requested by you, we will inform you of the reasons why we are unable to do so.

Protection of Personal Information

15. To safeguard your personal information from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as up-to-date antivirus protection, encryption and the use of privacy filters to secure all storage and transmission of personal information by us, and disclosing personal information

both internally and to our authorised third party service providers and agents only on a need-to-know basis.

16. You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

Accuracy of Personal Information

17. We generally rely on personal information provided by you (or your authorised representative). In order to ensure that your personal information is current, complete and accurate, please update us if there are changes to your personal information by informing our Privacy Officer in writing or via email at the contact details provided below.

Retention of Personal Information

18. We may retain your personal information for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by Applicable Laws.
19. We will cease to retain your personal information, or remove the means by which the information can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal information was collected, and is no longer necessary for legal or business purposes.

Transfer of Personal Information Outside Australia

20. We generally do not transfer your personal information to countries outside of Australia. However, if we do so, we will take reasonable steps to ensure that the recipient of your personal information does not breach the Privacy Act in relation to your information, unless your personal information is disclosed to an overseas recipient subject to laws which offer substantially similar to those protections set out in the Privacy Act.

Privacy Officer

21. You may contact our Privacy Officer if you have any enquiries or feedback on our privacy policies and procedures, or if you wish to make any request, in the following manner:

Attention: Stephen Smith

Email: stephen@fraxtor.com.au

Address: Unit G2, 204 Walcott Street, Menora WA 6050

Effect of Notice and Changes to Notice

22. This Privacy Policy applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal information by us.
23. If there is any inconsistency between the terms and conditions set out here and any other separate agreement between us and you, this Privacy Policy shall prevail to the extent of the inconsistency in respect of the subject matter specifically addressed in this Privacy Policy, subject to Applicable Laws.
24. This Privacy Policy may be amended, supplemented or otherwise modified by us at any time without any advance notification or obtaining your consent. Any amendments or supplements to, or other modifications of, this Privacy Policy shall be posted on our website and we do not have an obligation to inform you separately of any such revision. You agree that any revision to this Privacy Policy can and may take effect immediately upon publication or at such other timing as we may specify in writing. You agree that any notification of amendments in the abovementioned manner shall be sufficient notice to you, and your continued access to the website and platform shall be deemed as your unconditional acceptance to such revised Privacy Policy. You are therefore reminded to check the Privacy Policy regularly for the latest updated version. However, if at any point we decide to use your personal information in a manner which is materially different from that stated at the time it was collected, we will notify you by email or via a prominent notice on our website and where necessary we will seek consent.

Cookies

25. When you browse our websites or use our mobile applications, we use cookies to store information about how you use these websites or mobile applications in order to improve the quality of service provided to you.