



**BROKERMATE PTY LTD**

**ACN: 612 582 420**

**PRIVACY POLICY**

## BROKERMATE™

### PRIVACY POLICY

Updated January 18, 2019

#### Scope

Brokermate Pty Ltd (“**Brokermate**”, “**we**”, “**us**” or “**our**”) respects the privacy of our users, customers, and members. This privacy policy available on our website at [www.brokermate.com](http://www.brokermate.com) (and as amended from time to time) (“**Privacy Policy**”) describes the types of information we may collect from you or that you may provide when you visit or use our brokermate.com website or purchase a subscription to or use our Brokermate progressive web app (together, the website and web app are referred to as “**Website**”) or use our services related to our Website (“**Services**”), and our practices for collecting, using, maintaining, protecting and disclosing that information. This Privacy Policy applies to the data collected by us, or those working on our behalf, through information you enter or from the data imported from authorized and approved sources. It does not apply to data collected through other websites, products, or services not approved by us.

Our Privacy Policy describes:

- How and why we collect your Personal Information;
- How your Personal Information is used and protected;
- When and with whom we share your Personal Information; and
- What choices you can make about how we collect, use, and share your Personal Information.
  
- How we store, use, transfer, and retain your Personal Information.

Brokermate is bound by the Australian Privacy Principles (“**APPs**”) contained in the *Privacy Act 1988* (Cth) (“**Privacy Act**”). Brokermate has appointed a Privacy Officer, who oversees the Privacy Policy, and ensures that Brokermate’s

management of personal information is in accordance with this Policy and with the Privacy Act. Below in this section are some of the highlights of the Privacy Policy. Please read this entire document for a full description of our policies.

### **HIGHLIGHTS OF OUR PRIVACY POLICY**

The following presents highlights of our Privacy Policy. The details follow this section.

#### **Personal Information**

We collect and use your Personal Information for various purposes, such as, but not limited to, corresponding with you, informing you about your account, security updates and product information, processing your application, providing you with Services, processing your order, providing you with a subscription, and other purposes.

We may combine the information we collect from you with information obtained from other sources to help us improve its overall accuracy and completeness, and to help us improve our business and better tailor our interactions with you.

We may also collect information relating to your use of our Website through the use of various technologies, including cookies.

#### **Overview of Uses of Your Data**

- To create a user account.
- To fulfill your requests by us or by others involved in fulfillment.
- To contact you for customer satisfaction surveys, market research or in connection with certain transactions.
- To support products or services you have obtained from us.
- To share with our service providers who provide services to us in support of our business.
- To personalize your experience while you are on our Website, make navigation easier, and for Website usage statistics.

### **Your Choices**

When we collect information from you, you may tell us that you do not want it used for further marketing contact.

You may also turn off cookies in your browser.

You can view, edit, or delete your Personal Information online or contact us to do so.

You may withdraw your consent to us using your Personal Information at any time.

### **Contacting Us**

You may contact us using the Contact Information provided at the end of this Privacy Policy.

### **Acknowledgement and Consent**

By using or accessing our Website or the Services in any manner, you acknowledge that you accept the practices and policies described in this Privacy Policy (and as updated from time to time), and you hereby consent that we may collect, use, and share your information as described herein. If you do not agree with our policies and practices, your choice is not to use our Website or our Services. Your use of the Website and our Services is at all times subject to our Terms of Service (available at [www.brotermate.com](http://www.brotermate.com) (the “Terms”), which incorporates this Privacy Policy. Any capitalized terms we use in this Privacy Policy without defining them have the definitions given to them in the Terms.

## **DETAILS OF OUR PRIVACY POLICY**

### **What Does This Privacy Policy Cover?**

This Privacy Policy covers our treatment of personally identifiable information. This is information which may be connected to you specifically and which identifies you as the individual to whom the information relates. Such information may include your name, mailing address, email address, telephone number, and other information s (“**Personal Information**”). If you are a European citizen or resident

and to the extent that the European GDPR regulations are applicable to you, the definition may be different, so, please see the section toward the end of this Privacy Policy. Personal Information does not include your personally identifiable information that has been deidentified, pseudonymized, anonymized, aggregated, and/or otherwise processed so as to be unidentifiable in such a way that the data can no longer be attributed to a specific individual (by reasonable means) without the use of additional information, and where such additional information is kept separate and under adequate security to prevent unauthorized re-identification of a specific individual such that one could not, using reasonable efforts, link such information back to a specific individual (the foregoing in this sentence being referred to as “**De-Identified Personal Information**”).

We may also collect Personal Information from you through means other than our Website. It may also include emails, text messages, or other electronic communications that you send to us separate from our Website or by way of our third party service providers. However, if we combine the Personal Information we collect from you outside of our Website with Personal Information that is collected through our Website or by another means as described above, the Privacy Policy will apply to the combined information, unless specifically disclosed otherwise.

We gather various types of Personal Information, and we use this Personal Information internally in connection with our Services, including to personalize and improve our Services, to allow you to set up a user account and profile, to contact you and allow other users to contact you, to fulfill your requests for certain products and Services, to provide and improve the Services, and to analyze how you use the Services, all as explained in more detail below. In certain cases, we may also share some Personal Information with third parties, but only as described below.

Other than as stated herein, this Privacy Policy does not apply to information collected by any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or on our Website. We are not responsible for the practices of

sites linked to from the Services, and before interacting with any of these sites you are advised to review their rules and policies before providing them with any private information.

### **Individuals under the Age of 18**

As noted in the Terms, we do not knowingly collect, solicit or maintain Personal Information from anyone under the age of 18 or knowingly allow such persons to register for our Services. If you are under 18, please do not send any Personal Information about yourself (such as your name, address, telephone number, or email address) to us. No one under age 18 should provide any Personal Information to or on the Services. In the event that we learn that we have collected Personal Information from a child under age 18 without verification of parental consent, we will use commercially reasonable efforts to delete that information from our database. Please contact us if you have any concerns.

### **Changes to Our Privacy Policy**

We are constantly working to improve our Services, and we may need to change this Privacy Policy from time to time as well. We will alert you to changes by placing a notice on our Website, or as part of communications involving or as part of the Services, by sending you an email, and/or by some other means. Please note that if you have opted not to receive legal notice emails from us (or you haven't provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them. If you use the Services after any changes to the Privacy Policy have been posted, that means you agree to the new Privacy Policy, including all of the changes. Use of information we collect now is subject to the Privacy Policy in effect at the time such information is collected.

### **Information We Collect About You and How We Collect It**

We collect several types of information from and about you.

**Information You Provide to Us.** The information we collect on or through our Website may include:

- Information that you provide by filling in forms on our Website. This includes information provided at the time of registering to use our Website, subscribing to or purchasing Services, e-newsletters, posting material (where permitted) or requesting further Services. We may also ask you for information when you report a problem with our Website.
- Records and copies of your correspondence (including email addresses), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.
- Your search queries on the Website.

**Information We Collect Through Automatic Data Collection Technologies.**

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions and patterns, including:

- Details of your visits to our Website, including, but not limited to, traffic data, geolocation data, logs and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, browser type, clickstream patterns, the URL of the most recent website you visited before coming to our Website, the amount of time you spent on our Website, and the pages you viewed while on our Website.
- We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking). For more information on how to opt-out of third-party advertiser tracking mechanisms, please click [here](#).

The information we collect automatically is statistical data and may include Personal Information, but we may maintain it or associate it with Personal Information we collect in other ways or receive from third parties. It helps us to

improve our Website and to deliver a better and more personalized service, including, but not limited to, by enabling us to:

- Estimate our audience/visitor size and usage patterns.
- Store information about your preferences, allowing us to customize and improve our Website.
- Speed up your searches.
- Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include cookies, flash cookies, web beacons, pixel tracking, GIF and/or IP address. Each of these is discussed below.

#### *Cookies (or browser cookies)*

A cookie is a small file placed on the hard drive of your computer or mobile device. It may contain certain data, including, but not limited to: the name of the server that has placed it there, an identifier in the form of a unique number, and, an expiration date (some cookies only). Cookies are managed by the web browser on your computer (Internet Explorer, Firefox, Safari or Google Chrome).

Different types of cookies which have different purposes are used on our Website.

#### *Essential Cookies*

These cookies are essential to allow you to browse our Website and use its functions. Without them, services such as payment gateways would not be able to work.

#### *Performance Cookies*

These cookies collect information on the use of our Website, such as which pages are consulted most often. This information enables us to optimize our Website and simplify browsing. Performance cookies also enable our affiliates and partners to find out whether you have accessed one of our Websites from their site and whether your visit has led to the use or purchase of a product or Service from our Website, including the references for the product or Service

purchased. These cookies do not collect any information which could be used to identify you. All the information collected is aggregated, and therefore anonymous.

### *Functionality Cookies*

These cookies enable our Website to remember the choices you have made when browsing. For example, we can store your geographical location in a cookie so that the Website corresponding to your area is shown. We can also remember your preferences, such as the text size, font and other customizable aspects of the Website. Functionality cookies may also be able to keep track of the products or videos consulted to avoid repetition. The information collected by these cookies cannot be used to identify you and cannot monitor your browsing activity on sites which do not belong to us.

It is possible that you will come across third-party cookies on some pages of sites that are not under our control.

You may refuse to accept browser cookies by activating the appropriate setting in your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.

We also use cookies to implement tracking technology on our Website. This allows us to display advertising that is tailored to you on our Website which parts of our content interest you the most and which Service categories you request. This tracking uses De-Identified Personal Information data (i.e., data that cannot be identified as being specifically associated with you) and does not use your Personal Information. We will not combine this data with your other Personal Information without your express permission. At any time, you can prevent the use of cookies like this in the future (see below for how to do this). Some of our contracted vendors and affinity partners are allowed to place cookies on our Website. Those companies may also provide you with the option of preventing the use of cookies in the future. For more information, contact the relevant third-party provider.

**Flash Cookies.** Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from and on our Website. Flash cookies are not managed by the same browser settings as are used for browser cookies.

**Web Beacons.** Pages of our Website and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

**Pixel Tracking.** In addition to using Cookies, the Website may employ “pixel tracking”, a common process which may be used in connection with advertisements on other sites. Pixel tracking involves the use of pixel tags that are not visible to the user and consist of a few lines of computer code. Pixel tracking measures the effectiveness of advertisements and compiles aggregate and specific usage statistics. A “pixel tag” is an invisible tag placed on certain pages of websites that is used to track an individual user’s activity. We may access these pixel tags to identify activity and interests that may allow us to better match our goods, services, and other offers with your interests and needs. For example, if you visit our Website from an advertisement on another website, the pixel tag will allow the advertiser to track that its advertisement brought you to the Website. If you visit our Website, and we link you to another website, we may also be able to determine that you were sent to and/or transacted with a third-party website. This data is collected for use in our marketing and research.

**GIF.** We may use tiny images known as clear GIFs to track behavior of users, including statistics on who opens our emails.

**IP Address.** Our servers automatically record certain log file information reported from your browser when you access the Services. These server logs may include information such as which pages of the Service you visited, your internet protocol

(“IP”) address, browser type, and other information on how you interact with the Services. These log files are generally deleted periodically.

### **Information We Collect from Third Parties**

We may collect information that others provide about you when they use the Website, or obtain information from other sources and combine that with information we collect through the Website.

- **Third Party Services.** If you link, connect, or login to your account with a third party social media service (e.g., Facebook, WeChat), the third party service may send us information such as your registration and profile information from that service. This information varies and is controlled by that service or as authorized by you via your privacy settings at that service. We may also collect information from third party sources regarding compliance verification of your End Users, due diligence, and, verification of proof of your licensed brokerage.
- **Other Sources.** To the extent permitted by applicable law, we may receive additional information about you, such as demographic data or fraud detection information, from third party service providers and/or partners, and combine it with information we have about you. For example, we may receive background check results or fraud warnings from service providers like identity verification services for our fraud prevention and risk assessment efforts. We may receive information about you and your activities on and off the Website through partnerships, or about your experiences and interactions from our partner ad networks.

### **Third-Party Use of Cookies and Other Tracking Technologies**

Some content or applications, including advertisements, on the Website are served by third parties, including advertisers, ad networks and servers, content providers and application providers. First-party or third-party cookies may be used alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Website. A first-party cookie is a cookie set by the domain name that appears in the browser address bar. A third-party

cookie is a cookie set by (and on) a domain name that is not the domain name that appears in the browser address bar. It might be set as part of a side resource load (image, JS, iframe, etc. from a different hostname) or an AJAX HTTP request to a third-party server. The information that first-party and third-party cookies collect may be associated with your Personal Information or they may collect information, including Personal Information, about your online activities over time and across different websites and other online services (i.e., tracking such activities). They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

### **Google**

Google Analytics. We use, and some of our third-party service providers may use, [Google Analytics](#) (click for link to Google's website) or other analytics service to help us understand use of our Services. Such service providers may place their own cookies in your browser. This Privacy Policy covers use of cookies by us only and not the use of cookies by third parties.

Google AdSense Advertising. We use Google AdSense Advertising (or other search engine or display network advertising) on our website. Google's advertising requirements can be summed up by [Google's Advertising Principles](#) (click for link to Google's website). They are put in place to provide a positive experience for users. We have implemented the following: (a) Remarketing with Google AdSense and (b) Google Display Network Impression Reporting.

Google DART Cookie. Google, as a third-party vendor, uses cookies to serve ads on our Website. Google's use of the DART cookie enables it to serve ads to our users based on previous visits to our Website and other sites on the Internet. Users may opt-out of the use of the DART cookie by visiting the Google Ad and Content Network privacy policy.

We, along with third-party vendors such as Google, use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie) or other third-party identifiers together to compile data regarding user interactions with ad impressions and other ad service functions as they relate to our Website.

Google Maps/Google Earth. We also use Google Maps (including the Google Maps API(s)) and/or Google Earth, which may, among other things, request access to your geolocation, and both of which are subject to their own terms of use and privacy policy.

Users can set preferences for how Google advertises to you using the Google Ad Settings page. Alternatively, you can opt out by visiting the Network Advertising Initiative Opt Out page or by using the Google Analytics Opt Out Browser add on.

## How We Use Your Information

We use information that we collect about you or that you provide to us, including any Personal Information, for one or more of the following purposes:

- To present our Website and its contents to you.
- To provide you with information on products or services that you request from us.
- To provide you with services that you have requested.
- To process transaction payments (via our payment processing service provider) (but we do not receive or retain any full credit card numbers)
- To provide you with notices about your account, including expiration and renewal notices.
- To send you emails and newsletters with product, service, company, and other information.
- To communicate with you regarding information, features or offers that we believe will be of interest to you.
- To respond to your questions or other requests.
- To contact you with regard to the Website.

- To process any applications, changes to your account information.
- To process other information or Personal Information that you submit through this Website.
- To notify you about changes to our Website, our policies, terms or any products or Services we offer or provide through it.
- To allow you to participate in interactive features on our Website.
- To provide access to restricted parts of our Website.
- To provide verification of event attendance.
- To enhance and improve our products and Services, for example, by performing internal research, analyzing user trends and measuring demographics and interests.
- For internal purposes, such as Website and system administration or internal audits and reviews.
- To comply with applicable law(s) (for example, to comply with a search warrant, subpoena, or court order) or to carry out professional ethics/conduct investigations.
- For analyzing how the Services are used, diagnosing Service or technical problems, maintaining security, and personalizing content.
- To operate, maintain, and provide to you the features and functionality of the Services.
- To fulfill any other purpose for which you provide it.
- In any other way we may describe when you provide the information.

De-Identified Personal Information or non-Personal Information is aggregated for system administration and to monitor usage of the Website. It is utilized to measure the number of visits to our Website, average time spent, number of pages viewed and to monitor various other Website statistics. This monitoring helps us evaluate how visitors use and navigate our Website so we can improve the content.

We use cookies, clear gifs, and log file information to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the Website; (b) provide custom, personalized content and information; (c) monitor

the effectiveness of our Service; (d) monitor aggregate metrics such as total number of visitors, traffic, and demographic patterns; (e) diagnose or fix technology problems reported by our users or engineers that are associated with certain IP addresses; and, (f) help you efficiently access your information after you sign in.

### **Social Media Plugins**

We integrate social media application program interfaces or plug-ins (Plug-ins) from social networks, including Facebook, Google+, LinkedIn, Xing, Twitter, Instagram, Tumblr, WeChat, Pinterest and/or possibly other companies, into the Website. In order to register as a user with us, you may have the option to sign in using your Facebook or other social media site (SMS) login.

For example, when you visit our Website, the plugin creates a direct connection between your browser and the Facebook server. This allows Facebook to receive information about your visit to our Website with your IP address. If you click the Facebook “Like” button while you are logged on to your Facebook account, you can link the contents of our Website to your Facebook profile. This allows Facebook to assign your visit to our Website to your user account. Please note that as provider of the Website, we receive no notification about the contents of the transmitted data or their use by Facebook. If you do not want Facebook to assign your visit to our Website to your Facebook user account, please log out of your Facebook user account.

If you do so, you authorize us to access certain SMS account information, such as your public SMS profile (consistent with your privacy settings in SMS), your email address, interests, likes, gender, birthday, education history, relationships, interests, current city, photos, personal description, friend list, and information about and photos of your SMS friends who might be common SMS friends with other users. Plug-ins may transfer information about you to the Plug-in’s respective platform without action by you. This information may include your platform user identification number, which website you are on, and more. Interacting with a Plug-in will transmit information directly to that Plug-in’s social network and that

information may be visible by others on that platform. Plug-ins are controlled by the respective platform's privacy policy, and not by our Privacy Policy. You can find the privacy policy for a platform on their website.

## How We Share Your Information

### *Personal Information:*

Broadly stated, we may disclose, rent, or sell your Personal Information, in whole or in part, with third parties for the purpose of providing or improving the Services to you, who perform services on our behalf, or for marketing our Services to you. We disclose Personal Information to the following types of third parties, and for one or more of the following purposes:

- Hosting providers for the secure storage and transmission of your data.
- Identity management providers for authentication purposes.
- Database software providers for the management and tracking of your data.
- Legal and compliance consultants, such as external counsel, external auditors, or tax consultants.
- Marketing providers who send communications on our behalf regarding our products and Services.
- Payment solution providers for the secure processing of payments you provide to us.
- Technology providers who assist in the development and management of our Website.
- Advertising partners, including social media providers, for the delivery of targeted advertisements.
- Liquidity Provider for the purposes of providing services within the platform

We will not disclose your Personal Information to third parties for the purpose of them offering third-party products or services. We will not rent or sell your Personal Information to third parties, other than as noted below under "Disclosure/Assignment of Your Personal Information".

We may share your Personal Information with third parties for the purpose of providing or improving the Services to you. We may share your Personal Information with third parties who perform services on our behalf or on behalf of one of our subsidiaries, affiliates, affinity partners, or contracted vendors. This includes, without limitation, third parties that send communications, process payments, analyze data, provide credit checks, screening, or collection services, provide marketing assistance, or create, host and/or provide customer service on our behalf. These third parties may have access to Personal Information in order to provide these services to us or on our behalf. If we do this, such third parties' use of your Personal Information will be bound by obligations of confidentiality. We may store Personal Information in locations outside our direct control (for instance, on servers or databases located or co-located with hosting providers). Any Personal Information or content that you voluntarily disclose for posting to the Website may, if posted, become available to the public, as controlled by any applicable privacy or website customization settings. To change your privacy settings on the Website, you may visit the account settings page. If you remove information that you posted to the Website, copies may remain viewable in cached and archived pages of the Website, or if other users have copied or saved that information.

Events. From time to time, we may run contests, special offers, or other events or activities ("**Events**") on the Website together with a third party vendor. If you provide information to such third parties, you give them permission to use it for the purpose of that Event and any other use to which you consent. We cannot control third parties' use of your information. If you do not want your information to be collected by or shared with a third party, you can choose not to participate in these Events.

Except as otherwise described in this Privacy Policy, we will not disclose Personal Information to any third party unless required to do so by law, court order, legal process, or subpoena, including to respond to any government or regulatory request, or if we believe that such action is necessary to (a) conform to the law, comply with legal process served on us or our affiliates, subsidiaries, contracted

vendors, or affinity partners, or investigate, prevent, or take action regarding suspected or actual illegal activities; (b) enforce our Terms (including for billing and collection purposes); (c) take precautions against liability; (d) investigate and defend ourselves against any third-party claims or allegations; (e) respond to requests of or to assist government enforcement agencies; (f) to protect the security or integrity of our Website, our Services, or any software we provide related thereto; or, (g) exercise or protect the rights, property, or personal safety of us, our users or others. We will attempt to notify you about the requests in this paragraph unless: (i) providing notice is prohibited by the legal process itself, by court order we receive, or by applicable law, or (ii) we believe that providing notice would be futile, ineffective, create a risk of damage, loss, injury or bodily harm to an individual or group, or create or increase a risk of fraud upon us, our users, our Website, or our Services. In instances where we comply with legal requests without notice for these reasons, we will attempt to notify that user about the request after the fact if we determine in good faith that we are no longer legally prohibited from doing so and that no risk scenarios described in this paragraph apply.

It is likely that the identity and categories of such third parties will change during the life of your account. We require that our third-party service providers only use your Personal Information as necessary to provide the requested services to us and each service provider is subject to a set of terms consistent with the applicable portions of this Privacy Policy.

*De-Identified Personal Information:* We may share De-Identified Personal Information (such as anonymous usage data, referring/exit pages and URLs, IP address, platform types, number of clicks, etc.) with interested third parties to help them understand the usage patterns for certain Services. We have the right to use and disclose De-Identified Personal Information in published reports, presentations, articles, or other communications.

We will not use identifiers assigned by the government, such as a tax file number, Medicare number or provider number, for our own file recording purposes unless

required or authorized to do so by or under Australian or other law, regulation or court/tribunal order.

### **Your Consent to Disclosure/Transfer of Your Personal Information**

You consent to our disclosure of your Personal Information and other information to a potential or actual buyer or other successor for the purpose of considering a merger, divestiture, restructuring, reorganization, dissolution, or sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation or other proceeding, in which Personal Information held by us is among the assets transferred. You agree to and do hereby consent to (and shall not object to) our assignment, conveyance, transfer, and/or license (whether by contract, merger or operation of law) of any or all of our rights to your Personal Information and your consents, in whole or in part, and other information, with or without notice to you and without your further consent.

### **Data Transfer/Access Outside of Australia**

The Personal Information we collect may be stored and processed in servers within or outside of Australia and wherever we and our service providers have facilities around the globe. We will only disclose your Personal Information to a recipient who is not in Australia and who is not our entity after we ensure that: (i) the overseas recipient does not breach the Australian Privacy Principles (“APPs”); or (ii) you will be able to access to take action to enforce the protection of a law or binding scheme that has the effect of protecting the information in a way that is at least substantially similar to the way the APPs protect this information; or (iii) you have consented to the disclosure after we expressly disclose to you that there is no guarantee that the overseas recipient will not breach the APPs; or (iv) the disclosure of the information is required or authorized by or under an Australian law or a court/tribunal order; or (v) a permitted general situation (other than the situation referred to in item 4 or 5 of the table in subsection 16A(1) of the Privacy Act) exists in relation to the disclosure.

We will take reasonable steps to ensure that your Personal Information receives an adequate level of protection in the jurisdictions in which we process it. If you

are located in the European Economic Area (“**EEA**”) or Switzerland, we provide adequate protection for the transfer of Personal Information to countries outside of the EEA or Switzerland through a series of intercompany agreements based on the Standard Contractual Clauses. We may also need to transfer your information to other group companies or service providers in countries outside the EEA. This may happen if our servers or suppliers and service providers are based outside the EEA, or if you use our services and products while visiting countries outside this area.

If you are a resident of country other than Australia, you acknowledge and consent to our collecting, transmitting, and storing your Personal Information out of the country in which you reside.

## Security

We have implemented measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration and disclosure.

- Your Personal Information is contained behind secured networks and a firewall and is only accessible by a limited number of persons and service providers who have special access rights to such systems, and are required to keep the information confidential.
- Any payment transactions will be performed using our third party payment processors or gateways, who will use appropriate security procedures designed to protect your information.
- Our Website is scanned on a regular basis for security holes and known vulnerabilities in order to make your visit to our Website safer.
- We may store, retrieve, access, and transmit your Personal Information in the US or in other countries.

Account Safety. The safety and security of your information also depends on you. You should maintain good internet security practices. Where we have given you (or where you have chosen) a password for access to certain parts of the Website or Services, you are responsible for keeping this password confidential. You

should not share your password with anyone. You must prevent unauthorized access to your account and Personal Information by selecting and protecting your password appropriately and limiting access to your computer or device and browser by signing off after you have finished accessing your account. If your email account or Facebook account is compromised this could allow access to your account with us if you have given us those details and/or permitted access through those accounts. If your email account is compromised it could be used to ask us to reset a password and gain access to your account with us. If you think that any of your accounts have been compromised you should change your account credentials with us, and in particular make sure any compromised account does not allow access to your account with us. The information you share in public areas may be viewed by other users. We'll never email you to ask for your password or other account login information. If you receive such an email, please send it to us so we can investigate.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do use security measures designed to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to us or which we obtain. Any transmission of Personal Information is at your own risk. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time. We are not responsible for circumvention of any privacy settings or security measures contained on the Website or used with our Services.

### **Data Retention**

The time periods for which we retain your Personal Information depend on the purposes for which we use it. We will keep your Personal Information for as long as your account is active, or as long as you are an active account holder or user of our Services or for as long as we have another business purpose to do so and, thereafter, for no longer than is required or permitted by law, or our records retention policy, reasonably necessary for internal reporting and reconciliation purposes, or to provide you with feedback or information you might request. This period of retention is subject to our review and alteration.

We will keep your Personal Information only for as long as necessary depending on the purpose for which it was provided. When determining the relevant retention periods, we take into account factors, including, but not limited to, the following:

- our contractual and business relationships with you;
- legal obligations under applicable law to retain data for a certain period of time;
- statute of limitations under applicable law(s);
- (potential) disputes; and
- guidelines issued by relevant supervisory authorities.

The Personal Information we collect may be stored and processed in servers in or outside of Australia and wherever we and our service providers have facilities around the globe.

### **What Information You Can Access, Change, or Delete**

Through your account settings, you may access and, in some cases, edit or delete certain information you've provided to us, such as name and password, email address, address, user profile information, etc. The information that you can view, update, and delete may change as the Services or our practices change. If you have any questions about viewing or updating information we have on file about you, please contact us.

### **Notices; Opting Out**

By providing us with your email address (including by "following," "liking," linking your account to our Service or other services, etc., on a third party website or network), you consent to our using the email address to send you Service-related notices by email, including any notices required by law, in lieu of communication by postal mail. You also agree that we may send you notifications of activity on the Service to the email address you give us, in accordance with any applicable privacy settings. We may use your email address to send you other messages or content, such as, but not limited to, newsletters, additions or changes to features of the Service, or special offers. If you do not want to receive such email messages, you may opt out by emailing us your opt-out request or by

clicking “unsubscribe” at the bottom of our e-newsletter. Opting out may prevent you from receiving email messages regarding updates, improvements, special features, announcements, or offers. You may not opt out of Service-related emails.

You can add, update, or delete information as explained above. When you update information, however, we may maintain a copy of the unrevised information in our records. You may request deletion of your account by emailing us. It is your responsibility to maintain your current email address with us.

### **Privacy Training**

All of your new employees and other authorized users must be provided with timely and appropriate access to Brokermate’s Privacy Policy. You agree to provide all employees and other authorized users with opportunities to attend appropriate and periodic privacy awareness training and must ensure that they understand the privacy related issues that could adversely affect Brokermate’s position if not properly adhered to.

### **Incidents/Complaints Handling**

Any Brokermate employee or relevant third-party that identifies, knows about, or suspects a privacy breach must immediately report the matter to the Privacy Officer. Employees or other related parties that contravene or do not comply with Brokermate’s Privacy Policy may be subject to disciplinary action.

If an individual has a privacy complaint, he or she is required to send it in writing to the contact below.

Brokermate has an effective incidents/complaints handling process in place to manage privacy risks and issues. The incidents/complaints handling process involves (i) identifying (and addressing) any systemic/ongoing compliance problems; (ii) increasing consumer confidence in Brokermate’s privacy procedures; and (iii) helping to build and preserve Brokermate’s reputation and business.

Brokermate has a positive obligation under the *Privacy Amendment (Notifiable Data Breaches) Bill 2016* to notify you and the Office of the Australian Information Commissioner in the unlikely event that your Personal Information has been (i)

lost or stolen; (ii) accessed without your authorization; or (iii) there has been an inadvertent disclosure of Personal Information.

### Contact Information

If you have any questions about this Privacy Policy, our privacy practices, or for any other purposes, please contact us at [privacy@brokermate.com](mailto:privacy@brokermate.com).

### The Follow Provisions Apply Only to Citizens and Residents of the EEA:

If you are a European citizen or resident of the European Economic Area (“**EEA**”), or other regions with laws governing data collection and use that may differ from the laws in Australia, please note that we may transfer your information to a country or jurisdiction that does not have the same data protection laws as your jurisdiction. We may do so to process your information by staff operating outside the EEA who works for us or for one of our service providers.

The following provisions apply to you if you are a European citizen or resident. All processing of your Personal Information is performed in accordance with privacy rights and regulations, in particular, (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Information and on the free movement of such data, known as the General Data Protection Regulation (“**GDPR**”), and our processing will take place in accordance with the GDPR. For purposes of the GDPR, we will be the “data controller” of Personal Information (referred to in the GDPR as “personal data”, and which is defined differently than in this Privacy Policy) we collect through the Website, unless we collect such information on behalf of a “data controller” in which case we will be a “data processor.” This Privacy Policy does not apply to websites, applications or services that do not display or link to this Privacy Policy or that display or link to a different privacy policy. For EU residents and citizens only, to the extent any definition in this Privacy Policy conflicts with a definition under the GDPR, the GDPR definition shall control.

## Your Data Rights Under GDPR

Relevant data protection laws provide you certain rights regarding the protection of your data, including:

- **the right to access** - Upon request, we will confirm any processing of your Personal Information and, and provide you with a copy of that Personal Information in an acceptable machine-readable format.
- **the right to rectification** - You have the right to have us correct any inaccurate Personal Information or to have us complete any incomplete Personal Information.
- **the right to erasure** - You may ask us to delete or remove your Personal Information and we will do so in some circumstances, such as where we no longer need it (we may not delete your data when other interests outweigh your right to deletion).
- **the right to restrict processing** - You have the right to ask us to suppress the processing of your Personal Information but we may still store your Personal Information. See below for more information.
- **the right to object to processing** - You have the right to object to your Personal Information used in the following manners: (a) processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling); (b) direct marketing (including profiling); and, (c) processing for purposes of scientific/historical research and statistics. See below for more information.
- **the right to data portability** - You have the right to obtain your Personal Information from us that you consented to give us or that is necessary to perform fulfillment of member benefits with you. We will give you your Personal Information in a structured, commonly used and machine-readable format.
- **the right to complaint to a supervisory authority** - You have the right to file a complaint with a supervisory authority, in particular in the European member state of your habitual residence, place of work or place of the

alleged infringement if you consider that the processing of Personal Information relating to you infringes upon your rights.

- **the right to withdraw consent** - We rely on your consent to process your Personal Information, you have the right to withdraw that consent at any time. This will not affect the lawfulness of processing based on your prior consent.

**Data Privacy Officer Contact Information.** Our data privacy officer can be contacted at: Privacy Officer, email: [privacy@brokermate.com](mailto:privacy@brokermate.com).