



# Privacy Policy

ZIKSU CAPITAL LTD

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Product provider: Ziksu Capital Ltd  
ABN 73 642 576 350  
Authorised representative # 001280302  
Level 7, 200 Adelaide Terrace, East Perth, Western Australia 6004  
Phone 1300 194 578

We understand that by entrusting us with your personal information, we have a responsibility to protect and maintain your privacy. We take this privacy commitment seriously. We also recognize the importance of transparency with respect to our privacy practices. As part of our dedication to transparency, this Privacy Policy (**Policy**) describes the information we collect from you and how that information is used and shared by us. It also includes details about the choices we offer you in relation to your information. Please review it carefully.



In this Policy, 'us', 'we', 'our' and 'Ziksu' means **Ziksu Capital Ltd (Ziksu)** (ACN 642 576 350) and its related corporate bodies (as applicable).

## SCOPE OF POLICY

This privacy policy (**Policy**) applies to personal information collected by us. We are bound by the Australian Privacy Principles (**APPs**) contained in the Privacy Act 1988 (Cth) (the **Privacy Act**) and the APP guidelines, which governs the way private sector organisations collect, use, keep secure, and disclose personal information. We protect your information and aim to be clear and open about what we do with it. You can find more information from our Product Disclosure Statement and terms and conditions. The Policy sets out the following in relation to personal information of customers and/or users ('you' or 'your') submitted through the site owned and operated by Ziksu at <https://ziksu.com/>:

- what kind of personal information we collect.
- how we collect and hold personal information.
- why we collect, hold, use and disclose personal information.
- how we keep personal information secure, accurate and up to date.
- how to seek access to and update your personal information; and
- how to contact us with privacy queries.

We recognise the importance of protecting the privacy of personally identifiable information collected about our customers. We will not pass on the personal information you have given us to anyone without first asking your permission unless we are required or permitted to do so by law.

**We care about your privacy.**  
**We will never rent, trade, or sell your email address to anyone.**  
**We will never publicly display your email address or other personal details that identify you.**

We recommend that you read and consider this privacy policy carefully before navigating the Company's website <https://ziksu.com/> (**website**) or using any services provided by the Company. If you are under 18, you may use our website only with the involvement of a parent or guardian.



## WHAT INFORMATION WE COLLECT

In general, the personal information we collect about you includes, but is not limited to:

- your name, address (postal and residential), email address, mobile phone or telephone number, date of birth and gender when you register with us and download the mobile application operated by us (App).
- your identification details such as a driver's licence, Medicare card or Passport.
- details of the device you have used to access any part of our website or App, including connection type, internet protocol address, mobile payment methods, QR codes or use of mobile vouchers which information may be collected and used by us automatically if you use our website or App.
- demographic information and location data.
- financial information, including credit card or debit card information, and direct debit details for your bank account.
- transactions details relating to your use of our products and services; and
- any other personal information that is associated with your identity and which may be required to facilitate your dealings with us.

Your telephone calls to us may also be recorded for training and quality assurance purposes.

The type of personal information we collect will depend on the type of products and services you have asked us to provide. We aim only to collect the personal information necessary for us to provide these products and services.

Sensitive information is a sub-set of personal information that is given a higher level of protection under the APPs. Sensitive information means information relating to your racial and ethnic origin, political opinions, religion, trade union or other professional associations or memberships, philosophical beliefs, sexual orientation or practices, criminal records, health information or biometric information.

We only collect sensitive information if you consent to the collection of that information, and it is reasonably necessary for one or more of our functions or activities or collection of the sensitive information is required or authorised by law.



At the time personal information is collected or as soon as practicable thereafter, we will advise you of:

- our details and how to contact us.
- the purpose for which the information is collected.
- details of how to access any information held about you.
- the type of people and organisations to which we may disclose that information; and
- the legal and other consequences of you not providing the information, unless obvious in the circumstances or detailed on the collection form.

We may collect data relating to your activity on our website (including IP addresses) via tracking technologies such as cookies (see further below), or we may collect information from you in response to a survey. We generally use this information to report statistics, analyse trends, administer our services, diagnose problems, and target and improve the quality of our products and services. To the extent this information does not constitute personal information, the APPs do not apply, and we may use this information for any purpose and by any means whatsoever.

We generally advise that you do not publish or communicate personal information, or at least limit the personal information that you publish or communicate, to the public via our services, such as in our forums or blogs (**Non-Confidential Information**).

You acknowledge that we cannot control any third-party collection or use of your Non-Confidential Information.

You agree that we may use and disclose Non-Confidential Information for any purpose and by any means whatsoever.

## COOKIES

Our website uses 'cookies' to help personalise your online experience.

A cookie is a text file or a packet of information that is placed on your hard disk by a web page server to identify and interact more effectively with your computer.

There are two types of cookies that may be used at our website: a persistent cookie and a session cookie. A persistent cookie is entered by your web browser into the 'Cookies folder' on your computer and remains in that folder after you close your browser and may be used by your browser on subsequent visits to our website. A session cookie is held temporarily in your computer's memory and disappears after you close your browser or shut down your computer. Cookies cannot be used to run programs.

Cookies are uniquely assigned to you and can only be read by a web server in the domain that issued the cookie to you. In some cases, cookies may collect and store personal information about you. We extend the same privacy protection to your personal information, whether gathered via cookies or from other sources.

You can configure your internet browser to accept all cookies, reject all cookies or notify you when a cookie is sent. Please refer to your internet browser's instructions to learn more about these functions. Most web browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of our website.

### **Why we use cookies**

Our website uses cookies to:

- remember your preferences for using our website.
- show relevant notifications to you (e.g., notifications that are relevant only to users who have, or have not, subscribed to newsletters or email or other subscription services); and
- remember details of data that you choose to submit to us through online contact forms or by way of comments, forum posts, chat room messages, reviews, and ratings, etc.

Many of these cookies are removed or cleared when you log out, but some may remain so that your preferences are remembered for future sessions.

### **Third party cookies**

In some cases, third parties may place cookies through our website. For example:

- Google Analytics, one of the most widespread and trusted website analytics solutions, may use cookies for de-identified data about how long users spend on our website and the pages that they visit.
- Google AdSense, one of the most widespread and trusted website advertising solutions, may use cookies to serve more relevant advertisements across the web and limit the number of times that a particular advertisement is shown to you; and
- third party social media applications (e.g., Facebook, Twitter, LinkedIn, Pinterest, YouTube, Instagram, etc) may use cookies to facilitate various social media buttons and/or plugins in our website.





## Re-marketing

We may use the Google AdWords and/or Facebook re-marketing services to advertise on third party websites to previous visitors to this site based upon their activity on this site. This allows us to tailor our marketing to better suit your needs and to only display advertisements that are relevant to you.

Such advertising may be displayed on a Google search results page or a website in the Google Display Network or inside Facebook. Google and Facebook may use cookies and/or pixel tags to achieve this.

Any data so collected by Google and/or Facebook will be used in accordance with their own respective privacy policies. None of your personal Google and/or Facebook information is reported to us.

You can set preferences for how Google advertises to you using the Google Ads Settings page (<https://www.google.com/settings/ads>). Facebook has enabled an AdChoices link that enables you to opt out of targeted advertising.

## HOW WE COLLECT IT

We may collect and store personal information in paper, physical and electronic form provided by you in person or when you communicate with us by telephone, email, web-based form, letter, facsimile or other means. Where practicable, we will only collect information from you personally. However, we may collect your personal information through advertisers, mailing lists, recruitment agencies, contractors, and business partners. Where we receive (and retain) or use your personal information received from a third party, we will contact you and advise you that we hold this information.

We may collect your personal information when you request or acquire a product or service from us, register with us as an account holder, provide a product or service to us, complete a survey or questionnaire, enter a competition or event, contribute in a fundraising event, participate in our services (including our blogs and forums) or when you communicate with us by e-mail, telephone or in writing (e.g., if you contact our customer service team).

We may also collect information from your computer or mobile device automatically when you browse our website or use our App. This information may include the date and time of your visit, your domain, locality, operating system, the server your computer or mobile is using to access our website or App, your browser and version number, search terms you have entered to find our website or App, the pages of our website that you access, the device you use to access our App and your IP address. We may also record certain information about your use of our Website and the App such as which pages you visit and the time and date of your visit.



The device you use to access our Website and App may collect information about you including your location using longitude and latitude co-ordinates obtained through GPS, Wi-Fi, or cell site triangulation. For information about your ability to restrict the collection and use of such information, please use the settings available on your device.

We may use statistical analytics software tools such as Google Analytics and software (including cookies) which transmit data to third party servers located overseas including to Singapore, Japan, United States of America, Brazil, Germany, and Ireland. To our knowledge, Google Analytics does not identify individual users or associate your IP Address with any other data held by Google.

If, at any time, you provide personal or other information about someone other than yourself, you warrant that you have that person's consent to provide such information for the purpose specified.

## WHY WE COLLECT IT

The primary purpose for which we collect information about you is to provide you with products and services you have requested. We also collect information about you for the purposes outlined below.

We may state a more specific purpose at the point we collect your information.

If you do not provide us with the information that we request, we may not be able to provide you with our products or services. For example, if you do not register as a member of our website, you will not be able to access features or services that are reserved for members only.

## HOW WE USE IT

In addition to the primary purpose outlined above, we may use the personal information we collect, and you consent to us using your personal information:

- to communicate with you by phone, mail, email, or SMS, and if you use our App, via push notification, to inform you about existing and new products and services that may be of interest to you.
- to provide you with news and information about our products and services, and opportunities that we believe you may be interested in.
- to personalise and customise your experiences.
- to manage our relationship with you.
- to improve our service to you and your experience with us.
- to conduct competitions or promotions.
- to verify your identity and match your identification against an official record holder.



- to investigate any complaints about or made by you, or if we have reason to suspect that you are in breach of any of our terms and conditions or that you are or have been otherwise engaged in any unlawful activity; and/or
- as required or permitted by any law (including the Privacy Act).

We will ensure that any email that you are sent, by us as direct marketing, complies with the SPAM Act 2003 (Cth) and contains an 'unsubscribe' option, so that you can remove yourself from any further marketing communications. To opt-out of communications via SMS, reply with 'STOP'. You may also opt-out of receiving marketing materials from us, using the contact details set out below.

Please note that our direct marketing list may be operated by software and servers located overseas and your personal information may be sent overseas as part of our marketing.

We will also send communications that are required or necessary to be sent to users of our Website and App that contain information about important changes, or developments to, or the operation of, the Website or App, as well as other communications you request from us. You may not opt out of receiving these communications, though you may be able to adjust the media and format through which you receive these notices.

## HOW WE DISCLOSE IT

We may disclose personal information, and you consent to us disclosing your personal information, to related entities and employees (in which case, your personal information will be collected, used, disclosed, managed, and stored in accordance with this Policy).

We may also disclose personal information, and you consent to us disclosing your personal information, to third parties when it is necessary to provide you with our products and services, providing such third parties are:

- engaged by us to perform functions or provide products and services on our behalf, such as processing credit card information, mail outs, debt collection, marketing, research, and advertising.
- that are our agents, business partners or joint venture entities or partners.
- that sponsor or promote any competition that we conduct or promote via our services.
- authorised by you to receive information held by us.



- as part of any investigation into you or your activity, for example, if we have reason to suspect that you have committed a breach of any of our terms and conditions, or have otherwise been engaged in any unlawful activity, and we reasonably believe that disclosure is necessary to the Police, any relevant authority or enforcement body, or your Internet Service Provider or network administrator.
- as part of a sale (or proposed sale) of all or part of our business; and/or
- as required or permitted by any law (including the Privacy Act).

### Providing your personal information to overseas recipients

We may provide personal information we have collected about you (as described above) to third party overseas service providers or other recipients. You agree that we will not be required to take steps to ensure the overseas recipients do not breach the APPs or the Privacy Act 1988 (Cth).

However, we will not send your personal information outside of Australia unless:

- it is necessary to complete your transaction.
- it is to a third party that we use to assist us in providing our goods and/or services to you.
- you have provided your consent.
- we believed on reasonable grounds that the organisation involved would only deal with your personal information in a similar manner to the requirements under the APP's; or
- where otherwise allowed by the Privacy Act.

You agree that we will not be required to take steps to ensure the overseas recipients do not breach the APPs or the Privacy Act.

Any other use or disclosure we make of your personal information will only be as required by law or as permitted by the Privacy Act or by this Policy or otherwise with your consent.

### OPTING IN OR OUT

At the point we collect information from you, you may be asked to 'opt in' to consent to us using or disclosing your personal information, other than in accordance with this Policy or any applicable law. For example, you may be asked to opt-in to receive further information or communications from our advertisers and supporters.



You will generally be given the opportunity to 'opt out' from receiving communications from us or from third parties that send communications to you in accordance with this Policy. For example, you will be given the option to unsubscribe to e-newsletters sent by us.

If you receive communications purporting to relate to us or our services, that you believe have been sent to you, other than in accordance with this Policy, or in breach of any law, please write to us at the address set out below.

## MANAGEMENT AND SECURITY

We are committed to maintaining the confidentiality of the information that you provide us, and we will take all reasonable precautions to protect your personal information from unauthorised use or alteration. In our business, personal information may be stored both electronically (on our computer systems and with our website hosting provider) and in hard-copy form. Firewalls, anti-virus software and email filters, as well as passwords, protect all our electronic information. Likewise, we take all reasonable measures to ensure the security of hard-copy information.

Other than in relation to Non-Confidential Information, we will take all reasonable steps to protect the personal information that we hold from misuse, loss, or unauthorised access, including by means of firewalls, password access, secure servers and encryption of credit card transactions.

We use a number of mechanisms to protect the security and integrity of your personal information, including the appointment of a Privacy Officer to oversee the management of personal information in accordance with this Policy and the Privacy Act. Personal information is stored electronically.

We use secure methods to destroy or permanently de-identify your personal information when it is no longer needed. We will retain your personal information while it is required for any of our functions, or for any other lawful purpose.

Unfortunately, no data transmission over the Internet (or otherwise) can be guaranteed as completely secure. This means that we cannot guarantee that someone else will not read the information you choose to give us when you transmit or send it. Therefore, any information you send to us over the Internet or otherwise is transmitted or sent at your own risk.

You acknowledge that we are not responsible for the privacy or security practices of any third party (including third parties that we are permitted to disclose your personal information to, in accordance with this Policy or any applicable laws).



The collection and use of your information by such third party/ies may be subject to separate privacy and security policies.

If you suspect any misuse or loss of, or unauthorised access to, your personal information, please let us know immediately.

## **ACCESSING AND UPDATING YOUR INFORMATION AND HOW TO CONTACT US**

Subject to some exceptions in the Privacy Act, you have the right to seek access to and update the personal information we hold about you. We will handle requests for access to your personal information in accordance with the APPs. If you make an access request, we will ask you to verify your identity. We may charge a fee to cover the costs of meeting your request.

We will deal with all requests for access to personal information as quickly as possible. In some cases, consistent with the APPs, we may refuse to give you access to personal information we hold about you. This includes, without limitation, circumstances where giving you access:

- would be unlawful.
- would have an unreasonable impact on other people's privacy.
- would be likely to prejudice the taking of appropriate action in relation to suspected unlawful activity or misconduct of a serious nature, that relates to our functions or activities; or
- would be likely to prejudice enforcement related activities carried out by, or for, an enforcement body.

If we refuse to give you access, we will provide you with reasons for our refusal. Generally, if you request us to do so we will amend any personal information we hold about you which is inaccurate, incomplete, or out of date.

Members of our websites will generally be able to access and update their membership details online.

Whilst we will take all reasonable steps to ensure that the personal information you provide us is accurate and up to date, we request that you keep your information as current as possible so that we may continue to improve our service to you. You may ask us to correct or remove information which you think is inaccurate. If you would like to amend any of your details or the information you have provided to us, you can contact us using our contact details provided in this policy.



If you would like to seek access to personal information we hold about you, or if you have any questions or complaints about how we collect, use, disclose, manage, or store your personal information, you can contact the department that collected your personal information in the first instance, or write to:

**Privacy Officer**

Ziksu Capital Ltd

Phone: 1300 194 578

Email: [info@ziksu.com](mailto:info@ziksu.com)

Mail: Level 7, 200 Adelaide Terrace, East Perth, WA 6004

We will always endeavour to investigate your complaint and respond to you as soon as practicable after receipt, generally within 2 days. If you are not satisfied with our response, you may refer the matter to the Office of the Australian Information Commissioner.

**Office of the Australian Information Commissioner**

Complaints must be made in writing.

Phone: 1300 363 992

Mail: Office of the Australian Information Commissioner  
GPO Box 5218  
Sydney NSW 2001

Website: [www.oaic.gov.au](http://www.oaic.gov.au)

**GENERAL DATA PROTECTION REGULATION (GDPR)**

We welcome the GDPR of the European Union (EU) as an important step forward in streamlining data protection globally. Although we do not operate an establishment within the EU and do not target any offering of services towards clients in the EU specifically, we intend to comply with the data handling regime laid out in the GDPR in respect of any personal information of data subjects in the EU that we may obtain.

## GDPR rights

The requirements of the GDPR are broadly similar to those set out in the Privacy Act and include the following rights:

- you are entitled to request details of the information we hold about you and how we process it. For EU residents, we will provide this information for no fee.
- you may also have a right to:
  - have that information rectified or deleted.
  - restrict our processing of that information.
  - stop unauthorised transfers of your personal information to a third party.
  - in some circumstances, have that information transferred to another organisation; and
  - lodge a complaint in relation to our processing of your personal information with a local supervisory authority; and
- where we rely upon your consent as our legal basis for collecting and processing your data, you may withdraw that consent at any time.

If you object to the processing of your personal information, or if you have provided your consent to processing and you later choose to withdraw it, we will respect that choice in accordance with our legal obligations. However, please be aware that:

- such objection or withdrawal of consent could mean that we are unable to provide our services to you, and could unduly prevent us from legitimately providing our services to other clients subject to appropriate confidentiality protections; and
- even after you have chosen to withdraw your consent, we may be able to continue to keep and process your personal information to the extent required or otherwise permitted by law, in particular:
  - to pursue our legitimate interests in a way that might reasonably be expected as part of running our business, and which does not materially impact on your rights, freedoms, or interests; and
  - in exercising and defending our legal rights and meeting our legal and regulatory obligations.





### **Storage and processing by third parties**

Data that we collect about you may be stored or otherwise processed by third party services with data centres based outside the EU, such as Google Analytics, Microsoft Azure, Amazon Web Services, Apple, etc and online relationship management tools. We consider that the collection and such processing of this information is necessary to pursue our legitimate interests in a way that might reasonably be expected (e.g., to analyse how our clients use our services, develop our services, and grow our business) and which does not materially impact your rights, freedoms, or interests.

We require all third parties that act as 'data processors' for us provide sufficient guarantees and implement appropriate technical and organisational measures to secure your data, only process personal data for specified purposes and have committed themselves to confidentiality.

### **Duration of retention of your data**

We will only keep your data for as long as is necessary for the purpose for which it was collected, subject to satisfying any legal, accounting or reporting requirements. At the end of any retention period, your data will either be deleted completely or anonymised (for example, by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning). In some circumstances, you can ask us to delete your data.

### **Keeping your information up to date**

To ensure that your personal information is accurate and up to date, please promptly advise us of any changes to your information by contacting our privacy officer at [info@ziksu.com](mailto:info@ziksu.com) or by post.

### **CHANGES TO THIS PRIVACY POLICY**

From time to time, it may be necessary for us to revise this Privacy Policy. Any changes will be made in accordance with any applicable requirements under the Privacy Act and the Australian Privacy Principles. We may notify you about changes to this Privacy Policy by posting an updated version on our website. We recommend you check our website regularly to ensure you are aware of our current Privacy Policy.