



ACN 642 576 350

Privacy Policy

ZIKSU CAPITAL LTD

Last updated: November 2024

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 to Ziksu Capital Ltd (Ziksu) (ACN 642 576 350) and its related bodies corporate (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 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 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 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, 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 any of the above is obvious in the circumstances or detailed on a collection form.

We may collect data relating to your activity on our website (including IP addresses) via tracking technologies such as cookies (see our Cookies Policy), 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 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.

Third party cookies

Third-party cookies may be placed on our website in certain instances. For instance:

- Google Analytics, a widely used and trusted website analytics solution, may utilise cookies to collect de-identified data on user behaviour, such as session duration and page visits.
- Google AdSense, a prominent website advertising solution, may employ cookies to deliver targeted advertisements across the internet and manage ad frequency.
- Third-party social media applications (e.g., Facebook, Twitter, LinkedIn, Pinterest, YouTube, Instagram, etc.) may utilise cookies to facilitate social media buttons and plugins embedded on our website.

Re-marketing

We utilise Google AdWords and Facebook remarketing services to advertise on third-party websites to visitors who have previously interacted with our site. This allows us to customise our marketing efforts to better meet your preferences and display relevant advertisements only. Such ads may appear on Google search result pages, websites within the Google Display Network, or on Facebook. Google and Facebook may employ cookies and/or pixel tags for these purposes. Any data collected by Google and/or Facebook will adhere to their respective privacy policies. We do not receive any personal information from Google or Facebook.

You can manage your Google ad preferences through the Google Ads Settings page (<https://www.google.com/settings/ads>). Facebook offers an Ad Choices link that allows 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 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 (for example if you contact customer service to make a complaint or provide feedback).

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.
- for purposes necessary or incidental to the provision of goods and services to you such as administration and other operations including accounting.
- 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 contain 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 send to users of our Website and App that contain information about important changes or developments to or the operation of the Website or App or 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 where it is necessary to provide you with the products and services, such as third parties:

- engaged by us to perform functions or provide products and services on our behalf, such as processing credit card information,¹ 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 be connected with 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 of 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.

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 or by post.

Accessing and updating your information

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.

How to contact us

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

Level 7, 200 Adelaide Terrace

East Perth WA 6004

Email: info@ziksu.com

Phone: 1300 194 578

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. Complaints must be made in writing.

Office of the Australian Information Commissioner

GPO Box 5218

Sydney NSW 2001

www.oaic.gov.au

Phone: 1300 363 992

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.