

## Privacy Policy

### 1. Introduction

- 1.1 Peletier Investments Pty Ltd (ABN 53 199 430 973) ATF the Peletier Family Trust trading as Seed Financial (**we, us, our**) recognises the importance of protecting the privacy and the rights of individuals in relation to their personal information.
- 1.2 This privacy policy sets out our commitment to protecting the privacy of your personal information and how it is collected whether through our website (**Site**), directly from you or otherwise.
- 1.3 We respect your rights to privacy under the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles, and we manage the collection and disclosure of your personal information in accordance with these requirements.
- 1.4 We also uphold your rights to privacy if you are based in the European Union, in accordance with the *General Data Protection Regulation* (EU) (**GDPR**). Your rights under the GDPR are listed in clause 12.
- 1.5 If you do not wish to provide personal information to us, then you do not have to do so. However, this may affect your use of this Site or any products and services offered on it.

### 2. What is your personal information?

- 2.1 When used in this privacy policy, the term “personal information” has the meaning given to it under the *Privacy Act* and GDPR.
- 2.2 In general terms, it is any information that can be used to personally identify you. This may include your name, address, telephone number, email address and profession or occupation.
- 2.3 If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.
- 2.4 We may also collect some information that is not personal information because it does not identify you or anyone else. For example, we may collect anonymous answers to surveys or aggregated information about how users operate on our website.
- 2.5 Your personal information will not be shared, sold, rented or disclosed other than as described in this privacy policy.

### 3. What information we may collect from you

- 3.1 We may collect the following personal information from you:
  - a. names;
  - b. date of birth;
  - c. various forms of identification;
  - d. email address;
  - e. telephone number;

- f. business management information;
- g. profession or occupation
- h. billing, mailing and/or residential address;
- i. banking, credit card, or other online payment details to process purchases.

3.2 We collect personal information about you so that we can perform our business activities and functions and to provide best possible quality of customer service. We collect, hold, use and disclose your personal information for the following purposes:

- a. to provide our services to you;
- b. to conduct internal record keeping;
- c. to identify and understand user needs;
- d. to send communications requested by you;
- e. to answer enquiries and provide information or advice about existing and new services;
- f. to conduct market research, business development and marketing activities (including direct marketing);
- g. to send you promotional information about third parties that we think you may find interesting; and
- h. to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in cooperation with any governmental authority.

#### **4. How do we collect your personal information?**

4.1 We collect your personal information directly from you unless it is unreasonable or impracticable to do so. When collecting personal information from you, we may collect in ways including:

- a. when you make an enquiry about our services;
- b. when you fill in any of our online forms, including when downloading free publications or making online bookings;
- c. through your access and use of our website, including when you register as a member;
- d. during conversations between you and our representatives or through any other means or platforms, including social media;
- e. when you ask to be placed on one of our subscription/ mailing lists;
- f. when you become a client or customer of ours or otherwise use our products or services; when you visit any links shared via our social media posts, emails or other landing pages; or
- g. when you voluntarily provide us with feedback and customer information collected in the process of conducting customer surveys for market research purposes (**Surveys**);

#### **5. What happens if we can't collect your personal information?**

5.1 If you do not provide us with the personal information described above, some or all of the following may happen:

- a. we may not be able to provide our products or services to you, either to the same standard or at all;

- b. we may not be able to provide you with information about services that you may want, including information about special promotions; or
- c. we may be unable to tailor the content of our website to your preferences and your experience of our website may not be as enjoyable or useful.

## 6. Our website

### Site User Tracking Experience

- 6.1 We may use tracking software to review and improve your experience of our Site, Surveys and landing pages. In particular, we may use Facebook Pixel, Infusionsoft, Active Campaign, Click Funnels and Google Analytics, YouTube, etc.
- 6.2 Advertising products: Remarketing with Facebook, Google Analytics and Google Analytics Demographics and Interest Reporting. Google Analytics collects data about our Site traffic via Google Advertising cookies and anonymous identifiers.
- 6.3 Data collected via these Google products is not linked with any personally identifiable information you submit while on our Site. If you wish to opt out of the Google Analytics data collection, you may do so on Google's Site at [tools.google.com/dlpage/gaoptout](https://tools.google.com/dlpage/gaoptout).

### Cookies

- 6.4 When you access our Site, we may send a “cookie” (which is a small summary file containing a unique ID number) to your computer. This enables us to recognise your computer and greet you each time you visit our website without bothering you with a request to register. It also enables us to keep track of services you view so that, if you consent, we can send you news about those services.
- 6.5 We also use cookies to measure traffic patterns, to determine which areas of our website have been visited and to measure transaction patterns in the aggregate.
- 6.6 We use this to research our users’ habits so that we can improve our online services. Our cookies do not collect personal information. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them. We may log IP addresses (that is, the electronic addresses of computers connected to the Internet) to analyse trends, administer the website, track users’ movements, and gather broad demographic information.
- 6.7 The website may contain content and sharing tools embedded from various social networks, such as Facebook. These suppliers may use and place cookies on your device. We do not have access to, and cannot control, these cookies or the personal data and information that they may collect. You therefore need to check the websites of these suppliers to get further information on how they manage cookies and what information their cookies collect.

### Security

- 6.8 As our website is linked to the Internet, and the Internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you

communicate to us online.

- 6.9 We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the Internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

#### **Links**

- 6.10 We provide links to websites outside of our website, as well as to third party websites. These linked sites are not under our control, and we cannot accept responsibility for the conduct of any companies, businesses, affiliates, advertisers and sponsors, linked to our website.

- 6.11 Before disclosing your personal information on any other website or to any third party, we advise you to examine the terms and conditions of using that websites and its privacy policy. Third party websites are responsible for informing you about their own privacy practices.

### **7. Groups and forums**

- 7.1 If you participate in a discussion forum, chat room or webinar (whether hosted by us or not), you should be aware that the information you provide there will be made broadly available to others, potentially inside or outside us, who have access to that discussion forum or chat room. Also, please recognise that individual forums and chat rooms may have additional rules and conditions. Each participant's opinion on a forum or chat room is his or her own and should not be considered as reflecting the opinion of us.
- 7.2 Please be advised that for any forums or Webinars you attend, recordings can be enabled by a meeting or webinar host. By signing up for any of these, or any other host authorised by our webinar services or otherwise using them in any way, including without limitation by attending any our meetings or webinars, you expressly acknowledge that we may make and store Recordings for meetings, live calls or webinars, and may make such recordings available to hosts and other Attendees at the direction of us. If you do not want to be recorded, you can choose to leave the meeting, live call or webinar.

### **8. Who do we disclose your information to?**

- 8.1 We may disclose your personal information to:
- a. our directors, employees, agents, contractors or service providers for the purposes of operating our website or our business, fulfilling requests by you, and to otherwise provide services to you including, without limitation, web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants;
  - b. suppliers and other third parties with whom we have commercial relationships, for business, marketing, and related purposes, which may include overseas parties;
  - c. credit reporting agencies, banks, courts, tribunals, regulatory authorities where customers fail to pay for goods or services provided by us to them, and other law enforcement officers as required by Law; and

d. any other organisation for any authorised purpose with your express consent.

8.2 We only disclose this information if the third party has agreed to comply with the standards in our privacy policy.

8.3 If there is any change or potential change to the control of our business pursuant to the sale, assignment or transfer of the business, or business assets, its assets and/or liabilities, we reserve the right to sell, assign and/or transfer our user databases, together with any personal information and non-personal information contained in those databases to the extent permitted by law. In that event, your personal information may be disclosed to a potential purchaser, assignee or transferee, however any disclosures will only be made in good faith and where confidentiality is maintained.

## **9. Direct marketing materials**

9.1 We may send you direct marketing communications and information about our services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS and email, in accordance with applicable marketing laws, such as the *Spam Act 2003* (Cth).

9.2 If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so.

9.3 In addition, at any time you may opt-out of receiving marketing communications from us by contacting us (see the details below) or by using opt-out facilities provided in the marketing communications and we will then ensure that your name is removed from our subscription/ mailing list.

9.4 We do not provide your personal information to other organisations for the purposes of direct marketing.

## **10. Security and data quality**

10.1 We take reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorised access, modification or disclosure.

10.2 We strive to ensure the security, integrity and privacy of personal information that you submit to us through our website. Unfortunately, no data transmission over the Internet can be guaranteed to be totally secure.

10.3 We endeavour to take all reasonable steps to protect the personal information you may transmit to us or from our online products and services. Once we do receive your transmission, we will also make our best efforts to ensure its security on our systems.

10.4 In addition, our employees and the contractors who provide services related to our information systems are obliged to respect the confidentiality of any personal information held by us.

10.5 We may hold your information in either electronic or hard copy form. Personal information is destroyed or de-identified when no longer needed or when we are no longer required by Law to retain it (whichever is the latter).

## **11. How long do we retain your personal data?**

11.1 We will only keep your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

11.2 To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

11.3 By Law, we must keep basic information about our customers (including contact, identity, financial and transaction data) for five years for Australian tax law purposes.

11.4 In some circumstances, you can ask us to delete your data; see your legal rights below for further information.

11.5 In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **12. If I am based in the EU, what are my legal rights under the GDPR?**

12.1 If the General Data Protection Regulation applies to you because you are in the European Union, you have rights under data protection laws in relation to your personal data:

- a. The right to be informed – that’s an obligation on us to inform you how we use your personal data;
- b. The right of access – that’s a right to make what’s known as a ‘data subject access request’ for copy of the personal data we hold about you;
- c. The right to rectification – that’s a right to make us correct personal data about you that may be incomplete or inaccurate;
- d. The right to erasure – that’s also known as the ‘right to be forgotten’ where in certain circumstances you can ask us to delete the personal data we have about you (unless there’s an overriding legal reason we need to keep it);
- e. The right to restrict processing – that’s a right for you in certain circumstances to ask us to suspend processing personal data;
- f. The right to data portability – that’s a right for you to ask us for a copy of your personal data in a common format (for example, a .csv file);

- g. The right to object – that’s a right for you to object to us processing your personal data (for example, if you object to us processing your data for direct marketing); and
- h. Rights in relation to automated decision making and profiling – that’s a right you have for us to be transparent about any profiling we do, or any automated decision making.

12.2 These rights are subject to certain rules around when you can exercise them.

12.3 If you wish to exercise any of the rights set out above, please contact us at [admin@seedfinancial.com.au](mailto:admin@seedfinancial.com.au).

### **13. How can you access and correct your personal information?**

13.1 You may request access to any personal information we hold about you at any time by contacting us (see the details below).

13.2 Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you).

13.3 We may charge you a reasonable fee to cover our administrative and other reasonable costs in providing the information to you.

13.4 We will not charge for simply making the request and will not charge for making any corrections to your personal information.

13.5 There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

13.6 If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. We will consider if the information requires correction. If we do not agree that there are grounds for correction, then we will add a note to the personal information stating that you disagree with it.

### **14. How can you withdraw your consent to this privacy policy?**

14.1 You may withdraw your consent to this privacy policy at any point. If you wish to withdraw your consent to our collection and retention of your data, please contact our Data Protection Officer at [admin@seedfinancial.com.au](mailto:admin@seedfinancial.com.au) and we can arrange for your data to be deleted to the extent we are allowed to by law. However, this may affect your use of this Site or any products and services offered on it.

14.2 You may choose to restrict the collection or use of your personal information. If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by contacting us at the email address listed in this privacy policy.

14.3 To unsubscribe from our e-mail database, or opt out of any communications, please contact us at the email address listed at the start of the privacy policy, with “Unsubscribe” in the subject line of the e-mail.

**15. What is the process for complaining about a breach of privacy?**

15.1 If you believe that your privacy has been breached, please contact us using the contact information below and provide details of the incident so that we can investigate it.

15.2 We will treat your complaint confidentially, investigate your complaint and aim to ensure that we contact you and your complaint is resolved within a reasonable time (and in any event within the time required by the *Privacy Act* and/or the GDPR, if applicable).

**16. Contacting us**

16.1 If you have any questions about this privacy policy, any concerns or a complaint regarding the treatment of your privacy or a possible breach of your privacy, please contact us at [admin@seedfinancial.com.au](mailto:admin@seedfinancial.com.au).

16.2 We will treat your requests or complaints confidentially.

16.3 Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved.

16.4 We will aim to ensure that your complaint is resolved in timely and appropriate manner.

**17. Changes to our privacy policy**

17.1 We may change this privacy policy from time to time, however we will notify you of any changes to our privacy policy as and when they are made.

17.2 Any updated versions of this privacy policy will be posted on our website and will be effective from the date of posting. © Progressive Legal Pty Ltd (ACN 607 068 708) trading as Progressive Legal (2020). All Rights Reserved. This privacy policy was last updated 4 February 2020.