

QONECO

Privacy Policy

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QONECO PTY LTD

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<https://www.qoneco.com>

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Protecting your privacy and the confidentiality of your personal information is extremely important to us. This Privacy Policy is for customers of QONECO Pty Ltd (QONECO). QONECO is committed to protecting your privacy when you purchase our products and services and when you use our website.

The purpose of this Privacy Policy is to explain:

- the application of this Privacy Policy
- the kind of information QONECO may collect about you, how we collect it, and how we use it
- how we disclose that information
- the purposes for which QONECO collects, holds, uses and discloses that information
- how you can access the information we hold about you
- when we use your information to contact you
- the protection of your personal information.
- how you can make a complaint.

1. APPLICATION OF THIS PRIVACY POLICY

QONECO ensures the protection of any personal information it receives, as required by the Privacy Act 1988 (Cth) ('Privacy Act'). 'Personal information' is defined in the Privacy Act as:

“information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- a) whether the information or opinion is true or not; and
- b) whether the information or opinion is recorded in a material form or not.”

QONECO's Privacy Policy applies to personal information collected by QONECO, whether we have asked for the information or not. QONECO is governed by the Australian Privacy Principles (APPs) under the Privacy Act).

QONECO will review this policy on an ongoing basis and may update it from time to time to reflect administrative or legal changes. If we make changes, we will post those changes on the privacy page of QONECO's website. You are encouraged to check our website for any updates on a regular basis.

2. COLLECTION AND USE OF PERSONAL INFORMATION

2.1. Why we collect personal information

QONECO collects personal information about you:

- **because we need it to provide a product or service that you have requested**, for example, if you have requested information from the QONECO website, or purchased gold bullion from QONECO;
- **because you work for us**, or apply to us for a job or work experience

2.2. How we collect information and what kinds of information are collected

Broadly, there are three types of personal information or data we collect directly or indirectly from you:

Information that you specifically give us

For example, you may provide information about yourself when you are filling out an online form. This type of information may include your home address, business address, telephone number, business telephone number, email address and date of birth. The information that you give us may be:

- **Personal information that is required.** In some instances, you must provide personal information if you wish to use a particular service, purchase or sell precious metal to or from us or participate in an activity. This includes information such as the know-your-customer information required for anti-money laundering and counter-terrorism financing purposes as well as personal information required to open an account under your name.
- **Personal information that is optional.** You may choose to provide some personal information which is not required but is directly related to QONECO's functions or activities. If you choose not to provide this optional information, we would still be able to offer you the service, but perhaps with fewer options than if you had provided the optional information. For example, if you tell us you are interested in using your precious metals as payment for goods and services, we may be able to provide you with referrals to merchants who accept precious metal. If you provide us with unsolicited information that we do not require or which is not directly related to QONECO's functions or activities, QONECO may be required to destroy or de-identify that information, provided it is lawful and reasonable to do so.
- **Permissions.** Sometimes you will be asked to confirm that you agree to a particular activity. For example, you need to expressly confirm that you agree to the terms and conditions of a competition.

You are able to make changes to the information you provided us (for example, if you change your email address) or withdraw the permission you gave us for a particular service. Please refer to clause 4 below for more information.

Data we collect that tracks your activity

The data on your use of the QONECO and associated sites may be linked to personal information you have chosen to share with us when you register. Most Internet browsers automatically accept cookies. However, you can instruct your browser, by editing its options, to stop accepting cookies or prompt you before accepting a cookie from the sites you visit.

A cookie is a small information file sent to your computer, mobile or other device when you visit a website. It recognises your device on future visits. These types of files help us remember your visits to the QONECO website, assisting us in improving your site experience as well as ensuring that you see relevant online adverts or offers. Apart from the cookies that help us remember your

browsing preferences, language, or search parameters, another type of performance cookies collects anonymous information on how people use the site. We use third party services such as Google AdWords and Analytics to merge this data with other users to enable us to improve how the QONECO site operates. This stored data does not save any personal details that might identify you. This process helps us provide you with an online browsing experience that is more suited to your selections in order to make each visit more tailored. We use these cookies to collect information about your browsing habits in order to make advertising relevant to you and your interests.

Our website does not collect personally identifiable information about individuals except when such individuals specifically provide such information on a voluntary basis.

Information given to us

In some instances, you may be linked to our website by a merchant who accepts precious metals as payment. Where such a merchant has already conducted know-your-customer checks on you, we will request that information from them to satisfy ourselves that you also meet our anti-money laundering and counter terrorism financing customer onboarding standards. We may request further information from yourself or the merchant where required.

3. DISCLOSURE OF PERSONAL INFORMATION

3.1. Disclosure of personal information to third parties

QONECO may exchange your personal information with merchant account holders approved by QONECO so that QONECO can provide an integrated service to its customers. These merchants may use this information for their own compliance with the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) before providing you with a designated service or they may use your personal information to create an account for you to transact with them.

QONECO may disclose your personal information to third parties for the following purposes:

- to provide the service you wish to use;
- to allow you to transact with merchants in precious metals;
- to provide technical support to you to use QONECO's services;
- if permitted or required by law, for example, the Anti-Money Laundering and Counter Terrorism Financing Act 2006 (Cth), the Corporations Act 2001 (Cth) and Australian taxation laws (and also including where the disclosure meets an exception in the APPs); or
- otherwise with your consent.

In many cases, QONECO imposes contractual restrictions equivalent to those imposed on QONECO under the Privacy Act in respect of collection and use of personal information by those third parties. In some cases, QONECO's ability to impose contractual restrictions is limited. In those circumstances, QONECO will carefully consider the risks to the protection of personal information when entering into arrangements with third parties.

These third parties are located in Australia or overseas. We take reasonable steps to ensure that to the maximum extent reasonably possible any information sent to third party recipients overseas has the same level of privacy protection as we provide here in Australia.

We may share your email address and home address with third parties to deliver brochures, videos, information about promotions, news and other information about our website, products, services or special promotions on our behalf.

QONECO may also disclose your personal information (excluding sensitive information about you) to third parties for the purposes of direct marketing QONECO's services including brochures, videos, information about promotions, news and other information about our website, products, services or special promotions.

You will be able to opt-out of direct marketing at any time if you so choose. Under no circumstances will QONECO sell or receive payment for licensing or disclosing your personal information.

4. ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION

You have the right to request access to personal information that is held by QONECO about you.

You also have the right to request the correction of any of your personal information that QONECO holds. QONECO will take reasonable steps to make appropriate corrections to personal information so that it is accurate, complete and up-to-date. To seek access to, or correction of, your personal information please contact the Privacy Officer at QONECO as follows:

By email: support@qoneco.com

By telephone: 1300 328 029

By mail: QONECO PO BOX 336 Strawberry Hills, NSW 2012

We may charge a fee for processing your request.

We will seek to provide such information within 14 days, and in the manner so requested (where reasonable to do so).

QONECO may not always be able to give you access to all the personal information we hold about you. If this is the case, we will provide a written explanation of the reasons for our refusal, together with details of our complaints process for if you wish to challenge the decision.

5. USE OF YOUR PERSONAL INFORMATION TO CONTACT YOU

We will never knowingly send you unsolicited commercial electronic messages. More information on the Spam Act 2003 is available from the regulator's website: www.acma.gov.au/spam

We may use information that we know about your likes and interests to tell you about other QONECO programs, products and services. We may know about your likes and interests because you have provided that information.

6. HOW WE HOLD AND PROTECT YOUR PERSONAL INFORMATION

QONECO has implemented appropriate physical, electronic and managerial security procedures in order to hold and protect personal information from loss, misuse, interference, unauthorised access, alteration or destruction. QONECO regularly reviews security and encryption technologies and will strive to protect information to the fullest extent possible.

We encourage you to be vigilant about the protection of your own personal information when using third party digital services

7. NOTIFIABLE DATA BREACHES SCHEME

QONECO recognises and aims to remain fully compliant with its obligations under the Notifiable Data Breaches Scheme within the Privacy Act. In the event that personal information held by QONECO is subject to unauthorised use, access or disclosure, and such an event is likely to cause serious harm, QONECO will take all steps necessary to notify affected individuals and the Australian Information Commissioner.

8. CREDIT CARD INFORMATION

Crucially, your credit card details are only stored and transmitted in encrypted form. Unencrypted credit card information is NOT stored on our internet servers. Online credit card payments are currently processed using a third party payment gateway service run by payment processors which we may change from time to time.

If you use your credit card and the transaction is manual rather than electronic, the imprinted record will be stored by QONECO for the period that financial records are required to be retained.

9. MAKING A COMPLAINT

If you have a complaint about the way we handle your personal information or believe that we have breached the APPs, you should first contact our Privacy Officer at first instance as follows:

By email: support@qoneco.com

By telephone: 1300 328 029

By mail: QONECO PO BOX 336 Strawberry Hills, NSW 2012

We aim to respond to your concerns within 30 days.

If you are still dissatisfied with the response we have given you, you can contact the Office of the Australian Information Commissioner by calling them at 1300 363 992, making a complaint online at www.oaic.gov.au or writing to the Office of the Australian Information Commissioner, GPO Box 5218 Sydney NSW 2001.

10. PRIVACY AND CHANGE OF CONTROL

In the event QONECO goes through a business transition, such as a merger, being acquired by another company, or selling a portion of its assets, users' personal information will, in most instances, be part of the assets transferred.

11. ANONYMITY OF DEALINGS

We will not be able to provide any goods and services to you if you interact with us anonymously or pseudonymously. You may request not to be identified when asking about signing up an account or asking general questions about our products however you must be identified before you will be able to make any purchases. We also have obligations to report suspicious conduct to the relevant government authorities, regardless whether you request to be identified or not.

12. LINKED SITES

Our website may contain links to other sites. We are not responsible for the privacy practices or the content of such web sites. We encourage you to read the privacy statements of any linked sites as their privacy policy may differ from ours.