

ARGENTEX GROUP PLC

Privacy Policy

Argentex Pty Ltd

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1 Introduction

1.1 Purpose

This Privacy Policy explains how we use personal information of our customers. This policy may change from time to time, we shall take reasonable steps to inform you in such a case, by publication on our website.'

1.2 Regulatory settings

The Policy is designed to be fit-for-purpose and to meet the requirements of the Privacy Act 1988, specifically Australian Privacy Principle (**APP**) 1.3 and 1.4.

1.3 Definitions

Definitions that apply specifically to this policy are set out in the table below.

Term	Meaning
Personal information	<p>Information or an opinion about an identified individual, or an individual who is reasonably identifiable:</p> <ul style="list-style-type: none"> • whether the information or opinion is true or not; and • whether the information or opinion is recorded in a material form or not. <p>Examples of personal information generally include a person’s name, signature, home address, email address, telephone number, date of birth, medical records, bank account details and employment details.</p>

1.4 Principles

Our privacy management practices align to the following principles:

- **Accountability:** We are responsible for the protection of personal information entrusted to us.
- **Transparency and Control:** We inform customers when we collect their personal information and we acknowledge their preferences for contact.
- **Privacy by Design:** We apply privacy requirements when designing our products, services and when implementing new technologies.
- **Security:** We implement technical, organisational, and physical security measures to ensure an appropriate level of security of the personal information we control and process.
- **Third Parties processing information:** We choose trustworthy vendors and suppliers to process your personal information and we require them to commit to adequate privacy and data security standards. We also require our partners to commit to privacy policies and standards that we consider adequate.
- **Integrity and specific purpose:** We collect personal information to provide our services based on the contract you are entering with us. Your information will also be used to meet our legal obligations under appropriate legislation. We collect what we need to provide you with the best service, keeping it safe and accurate, while retaining it as needed for its intended purpose.

2 Your information

2.1 Information that we collect and hold

When you interact with Argentex such as through telephone, email or by visiting our website or bespoke client portal, we will collect information on you. For instance, to request information,

request online product demonstrations, register for a service and enrol in customer support, we collect and we ask you to provide information about yourself essentially 'your information' that includes:

Type of information	Details / examples
Contact details	Including your name, company name, business address, individual shareholders details, business e-mail address, phone number, the company you work for, your job title or business role, your area of responsibility, your country or region.
Government identifiers	These may include your: <ul style="list-style-type: none"> • Tax File Number (or foreign equivalent) and country of tax residency • Medicare card, Australian passport, driver licence, or pension card details • Securityholder Reference Number (SRN) or Holder Identification Number (HIN) • citizenship, birth, death, and marriage certificates (for example, to verify your identity). • foreign passport and driver licence (for example, to verify your identity at the time you request a product or service).
Account History	Including a history of transactions made under your account.
Contact History	A history of when you contacted us, the method used and what was discussed.
Call history	A recording and transcript of any calls made to us for quality assurance, complaints handling and in order to comply with our regulatory obligations.
User ID and password	If you establish an account with us and request access to our client portal.
Information about your computer or device	Including browser type and settings.
Log data	Including information such as your computer's IP address, the webpage you were visiting before you came to our website, pages you visit on our website, time spent on those pages, information you search for on our website, access times and dates, and other statistics.
History of interaction with our webpages	And traffic data relating to your Internet connection.
Other information that does not specifically identify you	For example, actions taken on our website.
Beneficiary account details	This may include third party information you provide to us to process your transaction.
Criminal checks	As part of our on-boarding process as you become a client in order to meet our legal obligations.
Publicly available information	On occasion, we may collect and handle information that is in the public domain, such as from: <ul style="list-style-type: none"> • online forums, websites, Facebook, Twitter, YouTube or other social media (for example, if you use social media to make a complaint) • public registers (for example, those kept by the Australian Securities and Investments Commission or Land Registry Services).

Type of information	Details / examples
Socio-demographic information	This may include your marital status, age, gender, number of dependents, occupation, and nationality.

Providing your information or data is optional, but it may be necessary for certain services we provide, and other such processing activities e.g. to access content, or to qualify your suitability as a new customer. In such cases, if you do not provide your information, we may not be able to provide you with the requested services.

2.2 Your legal rights in relation to information that we collect and hold

Your Legal Rights: In accordance with the Privacy Act, and within the limits thereof, you have, in relation to your Personal Information, the following rights:

- **Right of access:** you can request a copy of any Personal Information that we store to support our services, by contacting us using the information at the end of this Policy. We may not be able to provide you with access to all your Personal Information, and where this is the case, will explain this in our correspondence with you. We may also need to verify your identity when requesting personal information.
- **Right to rectification:** if you believe that any of your Personal Information is incorrect or incomplete, we will, upon your request, take reasonable steps to review and correct any factual inaccuracies.

If you wish to exercise your rights set out, you can contact us using the details at the end of this Policy.

2.3 How we collect your personal information

We collect your personal information directly from you most of the time, however on occasion, we may also collect information about you from other people and organisations.

We collect personal information when you:

- enquire about, apply for, or use our products or services;
- contact us to make an enquiry or give us feedback;
- visit our website or use our digital services;
- participate in other activities we offer, such as competitions or surveys; and
- talk to us or do business with us.

Third parties may provide us with information about you from online and offline sources. We may combine such information with the information we already have about you, to provide you with a better experience, to determine your interest in our products, and to improve the quality of our offerings. For instance, we may use third party web analytics tools to pool together contact information collected through any of our forms or email campaign with contact information provided by you via opt-in on other website form or email – to identify you when you visit our website. We may also aggregate your information with information collected from other website visitors, to generate statistics, and analyse and understand how visitors use our site. Also, we will be using information from third parties to confirm suitability as a client and to meet our legal obligations.

2.4 Keeping your information secure

We are focussed on keeping your information safe and secure. We store your hard copy and electronic records in secure buildings and systems or using trusted third parties. We use a range of physical, electronic, and other security measures to protect the security, confidentiality, and integrity of the personal information we hold about you.

These measures include:

- Physical safeguards such as controlled access to our facilities and secure destruction of media containing your information;
- Technology safeguards such as anti-malware, encryption, monitoring of our systems, firewalls, and secure communication software; and
- Organisational safeguards such as training and awareness programs to ensure employees understand the importance of safeguarding customer information.

We aim to keep personal information only for as long as we need it – for example for business or legal reasons. When we no longer need information, we take reasonable steps to destroy or de-identify it.

2.5 How we use your information – general

We use your information mainly to interact with you; to provide you with support services, to make it easy to navigate our site, to improve our site and our products, and to offer you content and services that might interest you.

We use your information as follows, where the processing is necessary to establish or administer our agreement with you:

- With your request, create a single sign on for access to your Argentex online account;
- In the performance of the contracted service we provide to you in order to make payment transfers on your behalf;
- Verify your identity and entitlement to products or services, when you contact us or access our services;
- Communicate with you regarding support services and provide you with critical service updates;
- Provide you with technical and customer support, and enable the provisioning of services;
- Register you for marketing events;
- Determine your qualifications and suitability as a client, and make decisions to provide services to you; and
- Determine the entity you are connecting from.

We use your information as follows, where the processing is based on our legitimate business interests to communicate with you and improve users' experience, improve our products and services, protect our security, and defend our legal rights:

- Call you or e-mail you with updates and marketing as described in this statement;
- Research and implement product improvements and product updates;
- Evaluate and improve the quality of our products, services and site;
- Provide you with a customised experience when you visit our site;
- Secure our systems and applications;
- Enforce our legal rights and comply with legal requirements;

- Monitor, administer, and analyse use of the site; and
- Increase our site's functionality and user-friendliness.

We may also use your information where processing is necessary for us to comply with legal obligations, including responding to legal process or lawful requests.

2.6 How we use your information – marketing

We may from time to time choose to extend an invite to sporting events or may send you a small token of our thanks.

We may also use your information to contact you with marketing, promotional materials, and other information that may be of interest to you. This may include using demographic data or trend data provided by third parties, where permitted. We may contact you by various means, including by mail, telephone, email, SMS, or other electronic means, such as through social media or targeted advertising through our websites or through our client portal.

We may also send you direct marketing communications and information about our services, in accordance with the Spam Act and the Privacy Act.

At any time, if you no longer wish to receive communications from us, please submit your request to our Compliance Officer using the contact details provided in section 3 Contact details, or by using the opt-out facilities provided (Unsubscribe Link).

2.7 Cookies

We use cookies, including third party cookies, for different purposes, including presenting you with information based on your browsing preferences, such as language and geographical region; collecting statistics regarding your website usage; allowing automated login; providing us with business and market information; and, in some cases, enabling us to provide you with interest-based advertisements on sites other than our own.

However, we do not track your activities on other sites. If you click on our advertisements, we will know only the domain you came from.

Cookies are small text files that are placed on your computer or device by a website that you visit or HTML-formatted emails you open. You can choose to reject or turn off cookies through your browser settings and you can manage your preferences through our cookie consent manager. If you do not accept cookies, you may not be able to use all the functionalities of the site. You will not be tracked by cookies if you interact with us through email or telephone.

Refer to the Cookie Policy for further details.

2.8 Do-Not-Track

There are different ways you can prevent tracking of your online activity on our website. One of them is setting a preference in your browser that alerts websites you visit that you do not want them to collect certain information about you. This is referred to as a Do-Not-Track (**DNT**) signal. Please note that our website may not recognise or react in response to DNT signals from web browsers. At present, there is no universally accepted standard for what a company should do when a DNT signal is detected. In the event a final standard is established, we will assess how to appropriately respond to these signals.

2.9 How we share your information

We do not sell, lease, rent or give away your information.

We will only share your information as described below, with our service providers that process information on our behalf, and as required by law enforcement. In instances where we share your information, we require the companies to comply with appropriate privacy and confidentiality requirements, and security standard best practices.

Who	Why
Other members of the Argentex Group	We may share your information between members of the Argentex Group. This helps us offer you a high-quality customer experience.
Service providers processing data on our behalf	<p>We may employ third party companies and individuals to provide services associated with the website, to perform website-related services (e.g., without limitation, site feature improvement, maintenance services, database management and web analytics), to analyse use of our site or to conduct marketing activities on our behalf (e.g., email management firms and internet advertising platforms, etc.), to perform collection services, to deliver requested goods and services to you.</p> <p>We do not allow service providers to share your information with others without our authorisation, or to use it for their own purposes.</p> <p>We may share your personal data with:</p> <ul style="list-style-type: none"> • our service providers or third parties which process information on our behalf to fulfil our contracted services to you; • third parties where you have a relationship with that third party and you have consented to us sending information (for example social media sites or other third-party application providers); and • We may also share non-personal information (such as aggregated usage data and demographics, referring pages, platform types, click counts, etc.) with third parties to help us understand usage patterns for our services, etc.
Government and law enforcement	<p>We may only disclose personal information to any law enforcement agency or government body in response to:</p> <p>We may share your personal data with:</p> <ul style="list-style-type: none"> • A warrant or other process issued by a court of competent jurisdiction; • A legal process having the same consequence as a court-issued request for information, in that by refusing to provide such information, we would be in breach of local law, and we or our, executives or employees would be subject to liability for failing to honour such legal process; • Where such disclosure is necessary for us to enforce our legal rights pursuant to the laws of the jurisdiction from which such information was gathered; or • Where such disclosure is necessary to prevent or lessen a serious and imminent threat of bodily harm to the data subject.

2.10 Sharing your personal information overseas

Sometimes, we may send your information overseas, including to:

- Argentex Group members that are located in the United Kingdom and the Netherlands;

- service providers or third parties who store data or operate outside Australia;
- complete international transactions, such as currency exchanges;
- organisations we partner with to provide products and services; and
- comply with laws and help government or law enforcement agencies.

If we do this, we make sure there are appropriate privacy, data handling and security arrangements in place to protect your information.

2.11 How can you access your personal information?

You can request access to the personal information that we hold about you. You can also ask for corrections to be made to it. To do so, please contact us using the contact details provided below.

There is no fee for requesting corrections to your personal information or for us to make those corrections. In some circumstances, we may charge you a reasonable amount for providing you access to your personal information to cover the costs of locating the information, copying it and supplying it to you.

We try to make your information available, or correct it, within 30 days of your request.

2.12 Making a privacy-related complaint

If you have a concern or complaint about how we have handled your personal information let us know and we'll try to fix it. We try to get things right the first time – but if we don't, we'll do our best to sort it out. If you're not satisfied with how we respond to your complaint about how we've handled your personal information you can also contact the Office of the Australian Information Commissioner if your complaint is about your privacy.

Office of the Australian Information Commissioner	
Visit:	oaic.gov.au
Email:	enquiries@oaic.gov.au
Phone:	1300 363 992
Mail:	GPO Box 5218, Sydney NSW 2001

3 Contact details

You can contact us in relation to this privacy policy by emailing our Compliance Officer at DPO@argentex.com.

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