

Privacy policy

1. Who are we?

Finder Wallet Pty Ltd (ABN 11 149 012 653) (**Finder Wallet**) owns and operates an online trading platform. Finder Wallet is part of the Finder group. Finder Wallet respects your privacy and shares your concern about the security of data you may submit to our platform. Finder Wallet is a cryptocurrency service provider where users can buy and sell cryptocurrency. We may outsource various services, including our customer service function, to an entity within the Finder group of companies.

2. What our privacy policy covers

Our privacy policy (the “Privacy Policy”), which forms part of our User Terms and Conditions, describes what personal information we collect, how we use personal information, the circumstances where we may disclose that personal information, how we secure and store personal information, and how to access, update and correct your personal information. We may not be able to provide our Services to you if you do not provide the information we request. By registering an account with us, or by using our website(s) or Services you agree to our Privacy Policy and our terms and conditions.

(a) *What is personal information ?*

Personal information means information or an opinion about an identified individual or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether the information or opinion is recorded in material form or not.

(b) *Changes to this Privacy Policy.*

This privacy policy is part of our User Terms and Conditions. We may make changes to our Privacy Policy from time to time by publishing the updates to this website, and those changes become effective 30 days from publication. We may provide separate notification of the updates by email or on our platform. By continuing to use our platform, you consent to the updates.

3. Collection of information

We try to only collect personal information which is reasonably necessary for, or directly related to, the particular function or activity we are carrying out. In addition to our requirements for business operation, we are required to collect personal information and verify the identity of user's of our services pursuant to the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006, and the Anti-Money Laundering and Counter-Terrorism Financing Rules.*

The main way we collect personal information about you is when you give it to us, usually by webform, email, and telephone.

(a) When you register an account:

Information including name, addresses, emails, telephone numbers, Finder member user details where relevant. We may collect other applicable information using a webform.

(b) Account verification:

We may collect information to enable us to process verification of your account information and so we can authenticate who you are.

(c) Using our services, or buying or selling:

Information you provide when you communicate with us, or information you provide including transaction information and payment information, which may include bank details. We also may collect information if you make a complaint, have dispute and if we investigate conduct related to use of our services.

(d) When you contact us:

This includes information gathered through webforms, email, or other means of communication between you and us, and where relevant between you and the other party to a transaction.

(e) Indirect information:

We may collect information from someone authorised by you, and you may authorise to collect information on your behalf from a third party, for example, a credit score or credit header file or similar collated information.

(f) Using your account:

This can include items you have purchased (as a buyer) or sold (as a seller), search history, communications, and other information which you may give us to help with identifying which products you may be interested in.

(g) Browsing our platform:

We may collect information from your browser, and device, including IP address, geographical location, search terms, device description, device operating system, browsing times and dates, user ID, location information, page view statistics, website traffic information, referral url, web log information.

(h) Direct Marketing:

We may use the personal information we collect for direct marketing. This includes receiving emails and sms messages from us. If you do not wish to receive direct marketing, please contact us in writing with your request. Please note that we may not be able to continue to provide our services to you if you opt

out of direct marketing.

(i) Cookies:

We may collect information using cookies and similar technologies, relevant to viewed pages, followed links, and other browsing behavior. You can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party Cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device. You can choose to delete Cookies on your computer or device at any time, however, you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings. It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

(j) Other sources:

We may get information from 3rd parties which are used to verify your identity, publicly available information, information from other users, information related to transactions and delivery of goods and services, credit related information and demographic information which is lawfully available to us.

(k) General:

We collect personal information which is reasonably necessary for the functions or activities of our business. We will only collect information by lawful and fair means and not in an unreasonably intrusive way.

4. Anonymity and pseudonymity

Where possible, and if you so choose, we will interact with you anonymously. However, if we do not have relevant personal information, we may not be able to provide our services to you.

5. Third Parties

Finder Wallet may contain hyperlinks to websites owned and operated by third parties, and advertisements by independent third party sellers. These third party sellers, and third party websites may have their own privacy policies and are also likely to use cookies, and we, therefore, urge you to review them. They will govern the use of personal information you submit when visiting these websites, which may also be collected by cookies. We do not accept any responsibility or liability for the privacy practices of such third party websites and your use of such websites is at your own risk.

6. What we use, retain and disclose

Our use of your personal information will always have a lawful basis, either because you have consented to our use of your personal information or because it is reasonably necessary to provide our services and undertake our activities.

(a) We use your personal information for the following purposes: we provide a personalised service, including using our services, using our platform interface; correspondence with you or as directed by you, or on your behalf; carrying out advertising, marketing and educative training or promotional activities; to facilitate marketing from third parties; to detect and investigate fraud and

other unlawful activities; to contact you; to improve our services; to provide technical and customer services; to provide feedback to you; to provide subscription services which you have consented to receiving including emails and newsletters; carrying out competitions; improving our services; helping you identify products or services which may be appropriate for you; referring you to product and service providers; in connection with a corporate transaction such as a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy; where we provide personalised services, we may analyse the information you supply, as well as your activity on our (and other) services, so that we can offer a more relevant, tailored experience and where appropriate we provide your personal information to third parties for purposes related to providing our services, including for regulatory requirements, processing transactions and identification.

(b) We may also use your information to provide you with offers, location based services, and to directly contact you using email, sms, telephone and postal mail for purposes including customer services related matters which includes technical issues, disputes, general assistance, collecting and refunding payments, and surveys. We may also use

personal information to enforce agreements.

(c) We may use information which we hold about you to show you relevant advertising on third-party sites (e.g. Facebook, Google). This could involve showing you an advertising message where we know you have a Finder Wallet account and have used Finder services. If you don't want to be shown targeted advertising messages from Finder Wallet, some third party sites allow you to request not to see messages from specific advertisers on that site in future.

(d) We store personal information for as long as we require it for our business purposes and legal compliance. We store personal information to stop criminal activity, to collect any overdue fees, to resolve disputes, to deal with technical problems, enforce our agreements, and for other purposes under Australian laws. We have security measures in place to protect your personal information.

(e) Your personal information may be shared with third parties and other companies in the Finder group in order to provide services to you, to identify you, to obtain your credit score if consented to, to enable us to undertake marketing and advertising related activities, for research purposes, to detect or investigate unlawful activities, to meet our legal

and compliance policy requirements, and for transaction processing.

(f) We may transfer your personal information to overseas recipients, including other businesses in our group, which may result in your personal data being transferred between, and stored on, servers in Europe, Australia and other countries.

(g) We may also access, hold and use aggregated information about the people that use our services. Aggregated information won't identify you or any other individual but simply provides us with non-personally identifiable data that we'll use to improve our services, understand our users' needs and develop tailored content. We may disclose this aggregate information to third parties for purposes including research and publishing statistics related to our business. Although you would have provided us with the information we aggregate for these purposes, it won't identify you or enable you to be personally identified.

(h) If we do not need your personal information for any or the purposes set out in this policy, or as required by law, we will take reasonable steps to de-identify or destroy the information.

(i) By using our services, you consent to us collecting, holding and using your personal information in this way.

7. Security

Your information is protected by security measures, including data encryption, access controls including physical controls and information access controls, firewalls. If you believe your account has been compromised, please contact customer services at support@finderwallet.com.

8. Accessing and correcting your personal information

(a) We aim to ensure personal information is accurate, up-to-date and complete. Please ensure that you provide us with accurate information.

(b) You have the right to ask for access to personal information that we hold about you, and ask that we correct that personal information and we must respond within 30 days. Following your access request, we must give you access to your personal information and we must take steps to correct it if we consider it is incorrect, unless we are prevented from doing so under a relevant law.

(c) We will require you to verify your identity before we give you access to your information or correct it. If we refuse to give you access, or correct it, we must notify you in writing of the reasons. If we have disclosed your information to a third party, and it has since been corrected, you can request us to tell them about the correction. If we refuse to correct the information, you can request that we associate it with a statement that you believe the information is incorrect and why.

9. How to make a complaint

(a) If you decide to make a complaint to us about how your personal information has been handled, you should write to us by email or post setting out the circumstances of your complaint, and how you wish for it to be resolved.

(b) Following receipt of your complaint, we will consider your complaint, and decide what action to take. If we decide that the complaint should be investigated, it will be handled by a more senior person than the person who the complaint is about. We will respond to you within 30 days.

(c) If you need additional information about the Australian Privacy Principles, the Privacy Law or our obligations you can also access the website of The Office of the Australian Information Commissioner (<http://www.oaic.gov.au/>).

10. How to contact us

If you want to arrange access to your information or have questions about privacy or the use of this site, please email privacy@finderwallet.com or write to us at:

Privacy Team

Finder Wallet,

Level 10, 99 York St,

Sydney, NSW, Australia 2000