

## **ArcTree Advisory – Privacy Policy**

This Privacy Policy sets out our commitment to protecting the privacy of personal information provided to us, or otherwise collected by us offline or online.

In this Privacy Policy we, us or our means ArcTree Advisory.

### **PERSONAL INFORMATION**

Personal information: The types of personal information we may collect about you include:

- your name;
- your contact details, including email address, mailing address, street address and mobile phone number/or telephone number;
- your credit card or payment details (through our third-party payment processor);
- your preferences and/or opinions;
- information you provide to us through customer surveys;
- your browser session and geo-location data, device and network information, statistics on page views and sessions, acquisition sources, search queries and/or browsing behaviour;
- information about your access and use of our Platform, including through the use of Internet cookies, your communications with our Platform, the type of browser you are using, the type of operating system you are using and the domain name of your Internet service provider;
- additional personal information that you provide to us, directly or indirectly, through your use of our Platform, associated applications, associated social media platforms and/or accounts from which you permit us to collect information; and
- any other personal information requested by us and/or provided by you or a third party.
- We may collect these types of personal information directly from you or from third parties, such as social media platforms.

### **COLLECTION AND USE OF PERSONAL INFORMATION**

We may collect, hold, use and disclose personal information for the following purposes:

- verifying your identity;
- to contact and communicate with you;
- for internal record keeping and administrative, invoicing and billing purposes;
- for analytics, market research and business development, including to operate and improve our business
- for advertising and marketing, including to send you promotional information about our products via email and SMS.
- services and information about third parties that we consider may be of interest to you;
- to comply with our legal obligations and resolve any disputes that we may have; and
- if you have applied for employment with us; to consider your employment application.

We will only process your personal information for our legitimate interest if we receive any requests, or we must perform a service in relation to, for example, any of our products or services. We use your personal information to fulfil your request or perform or provide you with our product or service. Where we need to fulfil your order, or manage your account, we will

use your personal information under the legal obligation to fulfil your order or manage your account. We will ask for your consent if we need to process any of your personal information for specific purposes which are not listed in this Privacy Policy.

## **DISCLOSURE OF PERSONAL INFORMATION TO THIRD PARTIES**

We may disclose personal information to:

- third party service providers for the purpose of enabling them to provide their services, including (without limitation) IT service providers, data storage, web-hosting and server providers, debt collectors, maintenance or problem-solving providers, marketing or advertising providers, professional advisors and payment systems operators;
- our employees, contractors and/or related entities;
- our existing or potential agents or business partners;
- anyone to whom our business or assets (or any part of them) are, or may (in good faith) be, transferred;
- credit reporting agencies, courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services we have provided to you;
- courts, tribunals, regulatory authorities and law enforcement officers, as required by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights;
- third parties, including agents or sub-contractors, who assist us in providing information, products, services or direct marketing to you. This may include parties located, or that store data, outside of Australia; and
- third parties to collect and process data, such as Google Analytics or other relevant businesses. This may include parties that store data outside of Australia.

Where the disclosure of your personal information is solely subject to Australian privacy laws, you acknowledge that some third parties may not be regulated by the Privacy Act and the Australian Privacy Principles in the Privacy Act and if any such third party engages in any act or practice that contravenes the Australian Privacy Principles, it would not be accountable under the Privacy Act and you will not be able to seek redress under the Privacy Act.

## **OUR COMMITMENT TO YOU**

Your personal information will:

- be processed lawfully, fairly and in a transparent manner by us;
- only be collected for the specific purposes we have identified in the 'collection and use of personal information' clause above and personal information will not be further processed in a manner that is incompatible with the purposes we have identified;
- be collected in a way that is adequate, relevant and limited to what is necessary in relation to the purpose for which the personal information is processed;
- be kept up to date, where it is possible and within our control to do so (please let us know if you would like us to correct any of your personal information);
- be kept in a form which permits us to identify you, but only for so long as necessary for the purposes for which the personal information was collected;
- be processed securely and in a way that protects against unauthorised or unlawful processing and against accidental loss, destruction or damage.

## **STORAGE AND SECURITY**

We are committed to ensuring that the personal information we collect is secure.

We cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk. Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that the personal information we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

## **LINKS TO OTHER WEBSITES**

Our Platform may contain links to other websites. We do not have any control over those websites and we are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Privacy Policy.

## **Cookies**

We may use cookies on our Platform from time to time. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally identifiable information. However, they do allow third parties, such as Google and Facebook, to cause our advertisements to appear on your social media and online media feeds as part of our retargeting campaigns. If and when you choose to provide our Platform with personal information, this information may be linked to the data stored in the cookie.

We may use web beacons on our Platform from time to time. Web beacons (also known as Clear GIFs) are small pieces of code placed on a web page to monitor the visitor's behaviour and collect data about the visitor's viewing of a web page. For example, web beacons can be used to count the users who visit a web page or to deliver a cookie to the browser of a visitor viewing that page.

We may use Google Analytics to collect and process data. To find out how Google uses data when you use third party websites or applications, please see [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/) or any other URL Google may use from time to time.

## **Amendments**

We may, at any time and at our discretion, vary this Privacy Policy. We will notify you if we amend this Privacy Policy, by contacting you through the contact details you have provided to us. Any amended Privacy Policy is effective once we notify you of the change.

For any questions or notices, please contact us at: [admin@arctree.com.au](mailto:admin@arctree.com.au)