

Gratifii Limited

Privacy Policy

Privacy Policy

Gratific Limited (**us, we, our**) is committed to protecting your privacy and maintains a policy of strict confidence concerning your personal information (**Privacy Policy**).

This Privacy Policy details how we deal with your personal information and has been developed in accordance with the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth) (**Privacy Act**).

By providing your personal information directly or indirectly you accept the terms of this Privacy Policy. Providing your personal information indirectly includes via one of our service providers or a person authorised by you to provide your personal information.

1. Why do we collect your personal information?

The information you provide to us is collected for the purpose of establishing, providing and enhancing the provision of our services to you. The gathering and combining of personal information allows us to produce a more integrated view of investors, which in turn gives us the ability to provide better products and services to our investors.

The primary purpose for which the information is collected is to enable our security holders' holdings to be maintained and administered efficiently, to keep our security holders informed about our business and its performance, and to enable us to comply with our legal and regulatory obligations.

We may also collect your personal information for marketing and promotional purposes.

2. What information do we collect?

We may ask for a range of personal information to assist us in providing you with our services. Information we may request includes personal information such as your name, address, date of birth, contact details, financial information, age and employment status. We may also ask you to provide your tax file number (TFN) and details of security holdings.

Information such as your bank account details and TFN may also, or instead, be collected by the share registry (Boardroom Pty Limited). Please refer to their privacy policy for further details: <http://www.boardroomlimited.com.au/Privacy.html>.

3. How do we collect your personal information?

We collect personal information about you directly from you. We may collect information from you when you:

- apply to invest in us;
- request information from us or from our service providers;
- telephone, email or write to us or our service providers;
- access our website;
- attend our presentations to investors, potential investors and financial planners; or
- subscribe to receive information through our website.

We may also collect your personal information from third parties including public sources, your adviser(s), agents, referrers, brokers and service providers. However, we will only collect information from third parties where it is not reasonable and practical to collect the information from you directly.

If someone other than you provides us with personal information about you that we did not ask for, or you provide us with unsolicited personal information, we will only hold, use or disclose this information if we determine that we could have collected this information from you had we asked for it. In this circumstance we will take all reasonable steps to notify you of the collection of that information. If we could not have collected this personal information, we will lawfully de-identify or destroy that personal information.

4. Use and disclosure of information

We will only use personal information for the purposes for which it was given to us, or for purposes which are directly related to the provision of our services.

In certain circumstances, it may be necessary for us to disclose your personal information to third parties in order to assist us in providing our services, or where disclosure is required by us to meet our legal and regulatory obligations. Third parties may include:

- the share registry, Boardroom Pty Limited;
- technology support services;
- auditors and insurers; and
- government and law enforcement agencies and regulators; and

We may also disclose your personal information to anyone authorised by you, or to whom you have provided your consent (either expressly or impliedly) or where another permitted general situation applies (as defined in Section 16A of the *Privacy Act 1988* (Cth)).

5. Disclosure to overseas recipients

We do not send or store personal information with overseas organisations, nor do we disclose personal information about an individual to an overseas organisation.

6. Storage and security

We keep physical and electronic records of the personal information we gather at our premises and the premises of our services providers, which may include storage on the cloud.

The security of your personal information is paramount to us and we use all reasonable endeavours to keep your information in a secure environment and to protect your personal information from misuse, interference, loss, unauthorised access, modification or disclosure. If you reasonably believe that there has been unauthorised use or disclosure of your personal information please contact us (see below).

If we no longer need your personal information, unless we are required under Australian law or a court or tribunal order to retain it, we will take reasonable steps to destroy, securely delete, or de-identify your personal information as appropriate.

7. Direct marketing

We may use your personal information to keep you informed of the range of products and services offered by us. This includes sending you information about new products and services by post, telephone or any form of electronic communication. We may use an email address or other contact information you provide to us at any time for this purpose.

You can opt out of receiving direct marketing material information from us at any time. You agree and acknowledge that even if you opt out of receiving marketing material, we will still send you essential information that we are required to send you relating to the services we provide.

8. Accuracy of your information

We take reasonable steps to ensure that the personal information held by us is accurate, complete and up to date. If you believe that any of your personal information is inaccurate, please contact us and we will take reasonable steps to correct it.

9. Third Parties and your information

This Site may link directly to websites operated by third parties (**Linked Sites**). You acknowledge that Linked Sites are not operated by us. We encourage you to always read the applicable privacy policy of any Linked Site. We are not responsible for the content or practices of the Linked Sites or their privacy policies regarding the collection, storage, use and dissemination of your personal information.

10. Variation and consent to variation

We may vary the terms of this Privacy Policy at any time. You should check this Privacy Policy regularly so that you are aware of any variations made to this Privacy Policy.

11. Access to your information and making a complaint

You may request access to the personal information we hold about you. If you do so we will respond to your request within a reasonable period of time and, where reasonable and practicable, give access to the information in the manner you request. This will be subject to any exemptions allowed under the Privacy Act. You may request this information by writing to our Privacy Officer.

Where it is practical to do so, when contacting us, you have the option to either not identify yourself or to use a pseudonym. However, this will not apply if we are required or authorised under Australian law (or a court or tribunal order) to only deal with individuals who have identified themselves.

If you wish to make a complaint about a breach of the Privacy Act by us, you may do so by providing your complaint in writing to the contact details listed above. You may also make a complaint verbally. We will seek to respond to any complaint within a reasonable period of time. We may seek further information from you in order to provide a comprehensive and complete response.

You may also make a complaint to the Office of the Australian Information Commissioner (OAIC). You may contact the Australian Information Commissioner via telephone on 1300 363 992, by

submitting a complaint or inquiry online at www.oaic.gov.au or by writing to the OAIC at GPO Box 5218 Sydney NSW 2001.