

QONECO

# Privacy Policy

JANUARY 2022

QONECO PTY LTD

Suite 11, Level 5, 23-35 Buckingham Street, Surry Hills NSW 2010 • ACN: 626 108 745

<https://www.qoneco.com>

## Table of Contents

1. APPLICATION OF THIS PRIVACY POLICY .....	2
2. COLLECTION AND USE OF PERSONAL INFORMATION.....	3
3. DISCLOSURE OF PERSONAL INFORMATION .....	5
4. ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION.....	7
5. USE OF YOUR PERSONAL INFORMATION TO CONTACT YOU .....	7
6. HOW WE HOLD AND PROTECT YOUR PERSONAL INFORMATION .....	7
7. ACCURACY OF PERSONAL INFORMATION .....	8
8. NOTIFIABLE DATA BREACHES SCHEME .....	8
9. CREDIT CARD INFORMATION .....	8
10. MAKING A COMPLAINT.....	9
11. PRIVACY AND CHANGE OF CONTROL .....	9
12. ANONYMITY OF DEALINGS .....	9
13. CONSENT AND MODIFICATION.....	9
14. LINKED SITES.....	10

This Privacy Policy is for customers of QONECO Pty Ltd (**QONECO**).

Protecting your privacy and the confidentiality of your personal information is extremely important to us. 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 is bound by the *Privacy Act 1988* (Cth) (**Privacy Act**), including the Australian Privacy Principles (**APPs**) and any relevant privacy code registered under the Privacy Act.

QONECO ensures the protection of any personal information it receives, as required by the Privacy Act and the APPs.

'Personal information' is defined in the Privacy Act as:

*"information or an opinion about an identified individual, or a reasonably identifiable individual:*

- 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 will review this policy on an ongoing basis and may update it from time to time to reflect administrative or legal changes (please see Section 13).

## 2. COLLECTION AND USE OF PERSONAL INFORMATION

### 2.1. Why do 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, purchased gold bullion from QONECO;
- **because you work for us** or apply to us for a job or work experience;
- **because you wish to participate in a product or service offered by one of our related entities, or**
- when we collect personal information about you from publicly available sources, including but not limited to court judgments, directorship and bankruptcy searches, Australia Post, White Pages directory, and social media platforms (such as LinkedIn, Facebook, Twitter, Google, Instagram etc.).

### 2.2. How we collect information and what kinds of information is collected

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

#### 2.2.1. 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:

#### 2.2.2. 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.

### **2.2.3. Personal information that is optional.**

You may choose to provide personal information that is not required but directly related to QONECO's functions or activities. If you decide 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 metals. 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 can change 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 the personal information you have chosen to share with us when you register.

Our website uses cookies to identify site users and their interests and track the site's usage.

Cookies are small information files sent to your computer, mobile or other devices when you visit a website. They recognise 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 and 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.

Most Internet browsers automatically accept cookies. However, by editing its options, you can instruct your browser to stop accepting cookies or prompt you before accepting a cookie from the sites you visit.

We use third-party services such as Google AdWords and Analytics to merge this data with other users 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 to tailor each visit. We use these cookies to collect information about your browsing habits 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 voluntarily.

### **Information provided to QONECO**

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 you 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.

Should it be necessary for QONECO to forward personal information to third parties outside QONECO, we will make every effort to ensure that the confidentiality of the information is protected.

In many cases, QONECO imposes contractual restrictions on third parties equivalent to those imposed on QONECO under the Privacy Act regarding the 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 protecting personal information when entering into arrangements with third parties.

These third parties may be 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.

### 3.2. Direct marketing

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

You give your express, and informed consent to us using your personal information set out in Section 3 where that information relates to the provision of services to you or marketing activities to provide you with information and to tell you about our products, services or events or any other direct marketing activity (including third party products, services, and events) which we consider may be of interest to you, whether by post, email, SMS, messaging applications and telephone (**Direct Marketing Communications**).

If you have provided inferred or implied consent (e.g. not opting out where an opt-out opportunity has been provided to you) or if it is within your reasonable expectation that we send you Direct Marketing Communications given the transaction or communication you have had with us, then we may also use your personal information to send you Direct Marketing Communications which we consider may be of interest to you. If at any time you do not wish to receive any further Direct Marketing Communication, you may ask us not to send those to you or disclose your information to other organisations for that purpose by using the "unsubscribe" facility in Direct Marketing Communications.

Under no circumstances will QONECO sell or receive payment for licensing or disclosing your personal information.

#### **4. ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION**

Under the APPs, you have the right to request access to personal information that QONECO holds 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 get in touch with the Privacy Officer at QONECO as follows:

By email: [support@qoneco.com](mailto: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).

The APPs set out the circumstances where QONECO may refuse your request for access to all or part of the personal information that 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 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](http://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.



Only authorised QONECO personnel are provided access to personal information, and these employees are required to treat this information as confidential. We may need to maintain records for a significant period of time. However, when we consider that information is no longer needed, we will destroy or permanently de-identify these records.

QONECO will take all reasonable steps to protect against the loss, misuse and/or alteration of the information under its control and that the information it holds is accurate, complete and up to date, including through appropriate physical and electronic security strategies.

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

## **7. ACCURACY OF PERSONAL INFORMATION**

QONECO will take all reasonable steps to ensure that any personal information collected, used or disclosed is accurate, complete and up to date. As the accuracy of personal information largely depends on the information that you provide to us, we request that you advise us of any errors or updates required to your personal information. If you believe that the information, we hold about you is inaccurate or out of date, they may contact our Privacy Officer (refer to Section 10), and we will update the relevant information accordingly.

## **8. 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. If 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.

## **9. 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.

## 10. 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](mailto: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](http://www.oaic.gov.au) or writing to the Office of the Australian Information Commissioner, GPO Box 5218 Sydney NSW 2001.

## 11. 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.

## 12. ANONYMITY OF DEALINGS

We will not be able to provide any goods and services to you if you interact with us anonymously or use a pseudonym. 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 of whether you request to be identified or not.

## 13. CONSENT AND MODIFICATION

By using the QONECO website, engaging us to provide you with services, where you have been provided with a copy of our policy or had a copy of our policy reasonably available to you, you acknowledge and agree that you:

- give the consents given by you in this policy; and
- have been informed of all of the matters in this policy.

We reserve the right to modify this policy as our business needs require. We will take reasonable steps to notify you of such changes (whether by direct communication or by posting a notice on

our website). If you do not agree to our continued use of your personal information due to the changes in our policy, please cease providing us with your personal information and contact us via the details set out in Section 10 of this policy.

#### **14. LINKED SITES**

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