

# Privacy Policy

This Privacy Policy applies to Monochrome Corporation Pty Ltd ACN 649 856 664 and its related bodies corporate ("Monochrome"); however companies within the Monochrome group of companies may have a company-specific privacy policy.

At Monochrome, we are committed to providing professional services and respecting the privacy of your personal information. We are bound by the Australian Privacy Principles under the Privacy Act 2001.

This Privacy Policy explains how we will collect, store, verify, use and disclose the information we hold about you and the conditions under which your information may be accessed.

## **Changes to our Privacy Policy**

If at any time our Privacy Policy changes, the updated details will be available on our website (<https://www.monochrome.co>). Any information we hold about you will be governed by the most current version of the Privacy Policy. Your continued use of our site, products and services indicates your acceptance of any changes.

## **Collection of personal information**

Monochrome collects and maintains personal information that is necessary to enable us to deliver our services or products for our primary business activities.

In the normal course of our business, we only collect information about you when you provide it to us or it is provided to us under your authority.

We will collect personal information directly from you when you apply for a product or a service which we are obliged to do by law prior to providing you with a product or service. We may collect personal information from you via telephone, email, in person or via our website. We take reasonable steps to always be transparent when, how and why we collect your personal information.

On occasion we may collect personal information about you from third parties, for example credit reporting agencies, share registries or regulatory authorities. Information that we collect will be limited to that required to provide you with our services.

## **What type of information do we hold?**

We may collect personal information about you in order to facilitate your use of our website and to provide you with our services. Personal information means information which identifies you personally, or by which your identity can reasonably be ascertained.

We are the Data Controller for data collected through our website.

If you are in the EU or the UK, the lawful basis when we process your personal information for the provision of our services is pursuant to a contract.

If you are in the EU or the UK, the lawful basis when we process your personal information for marketing is consent.

The personal information we hold about you may include:

- Contact information, including your name, address, email address, telephone number and other contact details;
- Your photographic identification, including (but not limited to) your driver's licence or passport and the details found on such documents, including (but not limited to) the document number, the document expiry date, and your date of birth;
- Your banking details, including any account numbers and other details relevant to processing deposits and withdrawals;
- Your TFN details;
- Information about your transactions;
- Your device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from the sites, ad data, IP address and standard web log information;
- For corporate clients, we may collect your Australian Business Number (ABN), registration records, information about shareholders, directors and secretaries, trust deeds, and any other documentation that we require to complete enterprise KYC in accordance with regulations;
- Details of the products and services we have provided to you or that you have enquired about, including any additional information necessary to deliver those products and services and respond to your enquiries;
- Any additional information relating to you that you provide to us through your use of our website, in person, from telephone conversations (which may be recorded), or through other websites or accounts from which you permit us to collect information;
- Information you provide to us through customer surveys; or
- Any other relevant information that you provide to us to enable us to provide you with a product or service.

We will only collect, maintain and use your personal information to adequately provide the products or services you have requested.

In most circumstances, the information that we hold about you has been provided to us by you or under your authority. If we have received information that is not required in order to provide services to you, we will either advise you that we hold this information or destroy it. Other purposes for which we may need to collect and use your personal information may include:

- To comply with legislative and regulatory requirements (including the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (AML/CTF Act));
- To enable us to perform administrative operations such as accounting, record keeping and archival retrieval; and
- To enable us to contact you when conducting marketing.

You may choose not to provide us with your personal information. In this case we may not be able to deal with you including providing you with a financial product or service. Under the AML/CTF Act, we must be able to identify our clients and verify their identity prior to the provision of services.

### **How we use your information**

Where required, we collect, use and exchange your information so that we can:

- Establish your identity, assess your eligibility and suitability for our products and services, and respond to your queries;
- Make improvements and set the price and design for our products, services and marketing;
- Administer our products and services;
- Manage our relationship with you and keep you updated on important information, products and services that might interest you;
- Manage our risks and prevent or investigate any actual or suspected fraud, unlawful activity or misconduct;
- Comply with our legal obligations; and
- We may also collect, use and exchange your information in other ways where permitted by law.

### **Direct marketing**

Unless you direct us otherwise, we may use your personal information for direct marketing, and may share it with third party provider companies for the sole purpose of facilitating direct marketing. If you do not want to receive direct marketing, please tell us by emailing [info@monochrome.co](mailto:info@monochrome.co) or unsubscribe from our mailing list by clicking the 'Unsubscribe' button at the bottom of all our emails and following the prompts.

## Sharing your information

Staff members at Monochrome will be able to access the information you share with us only when they need the information to provide you with a product or service.

We never share your personally identifiable information with advertisers without your express permission. If you choose to use the goods and services advertised, disclose your personal information directly to those companies or grant them permission to collect information about you, then their use of your information is governed by their privacy policies.

There are circumstances under which we may disclose your personal information, such as:

- When the disclosure is required by law (for example, to comply with various regulations, we may need to disclose certain information to the Australian Taxation Office, AUSTRAC or Centrelink);
- Authorised by law (such as where disclosure is necessary in the public interest or to protect our interests);
- In the event that we propose to sell our business, we may disclose your personal information to potential purchasers for the purpose of them conducting due diligence investigations. In the event that a sale of our business occurs, we may transfer your personal details to the purchaser of the business. As a client, you will be advised of such a transfer; and
- Responding to subpoenas, court orders and other legal processes.
- In some cases, it may be necessary to share information about you with and between our affiliates and organisations that provide services to us. You agree that we may provide your personal information to these service providers to use in connection with the supply of services to you and that they may provide us with your personal information to enable us to provide services to you.

We may disclose personal information outside of the jurisdiction of Australia including the United States of America, European countries and Asian countries. The most common reason will be when we use service providers to perform some functions on our behalf.

The privacy laws of those countries may not provide the same level of protection as the privacy laws of Australia. However, this does not change our commitment and obligation to safeguard your privacy and we will comply with all applicable laws relating to cross-border data disclosure.

## Using our Website and Cookies

We may collect personal information about you when you use and access our website. While we do not use browsing information to identify you personally, we may record certain information about your use of our website, such as which pages you visit, the time and date of your visit and the internet protocol address assigned to your computer or device.

We or our service providers may also use 'cookies' or other similar tracking technologies on our website that help us track your website usage and remember your preferences. Cookies are small files that store information on your computer, TV, mobile phone or other device. They enable the entity that put the cookie on your device to recognise you across different websites, services, devices and/or browsing sessions. Most browsers allow you to disable cookies, though our website may not work as intended for you if you do so.

We may also use cookies to enable us to collect data that may include personal information. For example, where a cookie is linked to your account, it will be considered personal information. We will handle any personal information collected by cookies in the same way that we handle all other personal information as described in this Privacy Policy.

### **Third-party analytics**

We use Google Analytics, a website analysis service provided by Google, Inc ("Google"), to analyse website statistics. Google Analytics places cookies on your computer's browser, those cookies generate information about your use of our website and that information is then transmitted to Google. The information is used to analyse the number of visits to our website and its pages, the average time spent on the site and the pages viewed. We will not (and will not allow any third party to) use Google Analytics to track or to collect any personal data of visitors to our website. We will not associate any data gathered via use of cookies with any personal data from any source as part of our use of Google Analytics.

You may choose to opt-out of Google Analytics using the Google Analytics Opt-out Browser Add-on, which you may access [here](#). To opt out of Google Analytics for display advertising or customise Google display network ads, you can visit the [Google Ads Settings page](#).

### **Website links**

Our website may contain links to third-party websites to which we have no affiliation. Unless you give us permission, we will not share your personal information with third-party websites. These websites have different privacy policies, and we recommend you read them before utilising the websites and third-party services.

### **Keeping your information secure**

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place physical, electronic and managerial procedures to safeguard and secure the information we collect online.

We may store your personal information in hardcopy documents or electronically. Both methods have locks, security systems and network security, and our staff policies require our staff to respect the confidentiality of any personal information held by us.

Our electronic storage is on our own server and secure cloud-based servers of third-party companies, which may mean in practice that personal information is stored outside the country in which it was collected. We will ensure any overseas third parties have appropriate data handling and security arrangements in place.

While we do everything we can to protect your information, we cannot assure you that personally identifiable information will never be disclosed in a manner that is inconsistent with this Privacy Policy. By using our services and products, you acknowledge that we are not responsible for any intercepted information sent via the Internet, and you hereby release us from any and all claims arising out of or related to the use of intercepted information in any unauthorised manner.

In the event there is a significant privacy breach, at law we are required to notify you and also report the breach to the Privacy Commissioner. If there is an actionable breach of your personal information, we will notify you within 72 hours.

In the event you cease to be our client, any personal information which we hold about you will be maintained in a secure manner for a period of seven years in order to comply with legislative and professional requirements, following which the information will be destroyed.

## **Children**

Our website is not targeted to children under 15 years of age and we do not knowingly collect personal information from children under the age of 15.

If we discover that the personal information of a child under 15 years of age is in the system, we will promptly delete such personal information from our systems.

## **Your rights**

You have a right to the following:

The right to access – You have the right to request us for copies of your personal information. We may charge you a small fee for this service if your request is complex.

The right to rectification – You have the right to request that we correct any information you believe is inaccurate. You also have the right to request us to complete the information you believe is incomplete.

The right to erasure – You have the right to request that we erase your personal information, under certain conditions.

The right to restrict processing – You have the right to request that we restrict the processing of your personal information, under certain conditions.

The right to object to processing – You have the right to object to our processing of your personal information, under certain conditions.

The right to personal information portability – You have the right to request that we transfer the personal information that we have collected to another organisation, or directly to you, under certain conditions.

If you make a request, we may take up to a month to respond to you. If you would like to exercise any of these rights, please contact us at our email: [info@monochrome.co](mailto:info@monochrome.co).

In certain circumstances we are allowed to deny your request or limit the access we provide. For example, we might not provide you access to commercially sensitive information or information that may unreasonably impact upon another person's right to privacy. Whatever the outcome, we will write to you explaining our decision. We may also need to confirm your identity to fulfil your request.

We will also try to answer you in the same manner that your request was submitted. For example, if you email us, we will, if practicable, provide you with that information via return email.

Sometimes we will ask that you put your request in writing, for example, where you request copies of material or access to older information or files which are not current or where it is necessary for us to retain a record of your request.

### **Closing your account**

Please note that when we close your account, we may retain and use your information as necessary to comply with our legal obligations, resolve disputes and enforce our agreements. There may be latency in deleting information from our servers and back-up versions might exist after deletion.

### **Contact us**

If you have a question or concern about your privacy, or if you would like to exercise any of your rights, please email us at: [info@monochrome.co](mailto:info@monochrome.co).

We will do our best to resolve your complaint as quickly as possible and will respond to you within one month. To the maximum extent possible, we will keep you updated on the progress of your request as we work to resolve the issue.

If we are unable to provide a final response within one month, we will contact you to explain why and discuss a timeframe to resolve the complaint.

If you raised the matter with us and it has not been resolved to your satisfaction, you can refer your complaint to your local data protection authority. We suggest you do this only once you have followed our internal complaint processes set out above.

If you are in Australia, you can contact the Office of the Australian Information Commissioner [here](#).

If you are in the EU, you can find your Data Protection Authority [here](#).

If you are in the UK, you can contact the Information Commissioner's Office [here](#).