

# IronArch Privacy Policy

Last updated March 2024

We are committed to treating the personal information we collect in accordance with the Australian Privacy Principles in the Privacy Act 1988 (Cth.) (*the Privacy Act*). This Privacy Policy sets out how we handle personal information.

In this Privacy Policy, 'IronArch', 'we', 'us' and 'our' refers to BKSS Holdings Pty Ltd ACN 667 896 657 and its controlled entities (including RefiNow Pty Ltd ACN 667 908 518, FinNow Pty Ltd ABN 66 675 214 016 BKSS Property Management Pty Ltd ACN 667 906 677, IronArch Invest Pty Ltd 675 569 310, IronArch Ventures Pty Ltd ACN 673 155 309).

We may need to update this Privacy Policy from time to time to reflect our current privacy practices or changes in the law, regulations and/or professional standards.

## 1. PERSONAL INFORMATION WE COLLECT

The types of personal information we collect depends on the nature of our relationship with you. Examples of personal information we may collect include:

- General identification information such as names, job title, occupation, date of birth and gender.
- Contact details such as address, email address, phone and mobile phone number and Internet Protocol (IP) address.
- Educational qualifications, employment history, salary and referee reports.
- Payment details including PAYG Payment Summaries, payslips, and other income earning information, for example payment summaries from your employer and super fund, statements from banks and financial institutions showing interest received, employment termination payment summaries, receipts for gifts, donations and work-related expenses.
- Information contained in identification documents such as passport or driver's licence.
- Financial information such as credit card and bank account details, shareholdings and details of investments (e.g. if you have shares, units, managed funds or other investments, details of dividend payments and distributions from managed funds, any investment gains or losses from the disposal of shares, units and rental properties, including associated income and expenditure).
- Details of superannuation

You might need to provide personal information about other individuals to us (e.g. about your spouse, dependants or other family members or employees). If so, we rely on you to have informed those individuals that you are giving their personal information to us, to have advised them about this Privacy Policy and how they can obtain a copy of it and that you have the necessary authority to provide that personal information to us.

## 2. COLLECTING PERSONAL INFORMATION

Generally we collect your personal information from you directly, for example, when we deal with you in person or over the phone, when you send us correspondence (including via email), when you complete a questionnaire, form or survey or when you subscribe to our publications.

Sometimes we will collect your personal information from outside sources. These can include marketing mailing lists and other public information (including public posts to social networking sites such as LinkedIn and Twitter) and commercially available personal, identity, geographic and demographic information. Outside sources may also include information gained from a third party. For example, we may collect your personal information from:

- your employer or previous employer
- your referees
- your personal representatives
- a financial advisor, and/or
- where you have authorised disclosure to us, from banks, or
- where you have applied for a job, from other persons, such as law enforcement agencies, the Department of Home Affairs, education or other institutions or professional organisations.

We may also collect personal information about you from your use of our websites and social media and information you provide to us through contact mailboxes.

## 3. HOLDING PERSONAL INFORMATION

We hold personal information in both hard copy and electronic formats. In some cases, we engage third parties to host electronic data (including data in relation to the services we provide) on our behalf. We take security measures to protect the personal information we hold which includes physical controls (for example, security passes to enter our offices and storage of physical records in lockable cabinets) as well as technological controls (for example, restriction of access, firewalls, the use of encryption, passwords and digital certificates).

Personal information may be retained for varying time periods in order to comply with legal and regulatory obligations and for other legitimate business reasons.

#### 4. PURPOSE FOR COLLECTING, HOLDING, USING AND DISCLOSING PERSONAL INFORMATION

We will only use your information if we have a lawful reason to do so such as when it's our legal duty, if we have your consent and when it's in our legitimate interest to do so. Reasons include:

- To provide our services to you or to our client.
- To maintain contact with our clients and other contacts (including alumni), and keep them informed of our services, industry developments, seminars and other events.
- For administrative purposes, including:
  - processing payment transactions,
  - charging and billing,
  - detecting or preventing fraud, and
- For governance and compliance purposes including:
  - managing any quality, conduct or risk management issues including conflict of interest or independence (including auditor independence) obligations or situations,
  - meeting regulatory obligations, and
  - where we are required to or authorised by legislation or industry code, direction or standard to do so.

We may also use your personal information for the purpose of marketing its services to you.

#### 5. SHARING PERSONAL INFORMATION

We may share your personal information with other parties including:

- Your authorised representatives, advisors and referees,
- Our professional advisors or third party contractors
- Third party banks and financiers as part of a transaction or service with you or our client
- Other parties when you ask us to do so or when you consent to that disclosure.

#### 9. ACCESS TO PERSONAL INFORMATION

It's important that you make sure the personal information we hold about you is accurate, up to date and complete. If any of your details change or if you believe that any personal information we have collected about you is inaccurate you can contact us and we will take reasonable steps to correct it in accordance with the requirements of the *Privacy Act*. We may charge reasonable costs for providing you access to your personal information.

#### 10. COMPLAINTS

You can notify us of any complaint you may have about our handling of your personal information. Following your initial contact, you will be asked to set out the details of your complaint in writing in a form provided.

We will endeavour to reply to you within 30 days of receipt of the completed complaint form and, where appropriate, will advise you of the general reasons for the outcome of the complaint.

While we hope that we will be able to resolve any complaints you may have without needing to involve third parties, if you are not satisfied with the outcome of your complaint, you can refer your complaint to the Office of the Australian Information Commissioner.

#### 11. HOW TO CONTACT US

If you have any questions in relation to this Privacy Policy or our management of your personal information you can contact our National Privacy Liaison by email or at:

National Privacy Officer  
IronArch Group  
Level 1, 44 Martin Place  
Sydney NSW 2000