

PRIVACY POLICY

1 Introduction

- 1.1 Zed Finance Group Pty Ltd (**Zed, we, us, our**) operates an online platform and related services, including the Zed Vault fund-holding and payment release service (together, the **Platform**).
- 1.2 We are committed to protecting your privacy and handling your personal information in accordance with the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**).
- 1.3 This Privacy Policy explains how we collect, use, disclose and protect your personal information when you use the Platform, our website, social media, or otherwise interact with us.
- 1.4 By using the Platform or otherwise providing personal information to us, you acknowledge this Privacy Policy and consent to your personal information being handled in accordance with it.

2 What is personal information?

- 2.1 In this Privacy Policy, personal information has the meaning given in the Privacy Act. It is information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not and whether recorded in a material form or not.
- 2.2 Some personal information is sensitive information (for example, information about your health, biometric information, or criminal history). We will only collect, use and disclose sensitive information where permitted by law, including with your consent or where required or authorised by law.

3 Whose personal information do we collect?

We may collect personal information about:

- (a) current and potential clients and contractors using the Platform (including sole traders);
- (b) individuals associated with clients or contractors (such as directors, beneficial owners, employees, guarantors, authorised representatives);
- (c) visitors to our website and users of our social media pages; and
- (d) other persons who interact with us in the ordinary course of business.

4 What personal information do we collect?

- 4.1 The types of personal information we collect will depend on how you use the Platform and our services. It may include:
 - (a) Identity and contact details – name, email address, phone number, residential or business address, date of birth.
 - (b) Government identifiers and KYC information – driver licence, passport, Medicare card, other identity documents, and information we reasonably require to satisfy our KYC and AML/CTF obligations.

- (c) Business details – ABN/ACN, company or trading name, role/position, licences and insurances, professional qualifications.
 - (d) Project and Platform information – information about Projects, Quotes, disputes, communications through the Platform and related documentation (photos, videos, invoices, logs).
 - (e) Financial and transaction information – bank account details, limited payment card details (where processed through a payment gateway), transaction history, amounts and timing of payments to and from the Zed Vault trust account.
 - (f) Technical and usage information – IP address, device identifiers, browser type, operating system, pages viewed, cookies and similar tracking technologies, access dates and times, referrer URLs.
 - (g) Marketing and communication preferences - your preferences regarding marketing communications, survey responses and feedback.
- 4.2 We will generally not collect information about your health or other sensitive information unless it is reasonably necessary for our functions (for example, where you tell us about serious illness in the context of an extension request) and you consent, or we are otherwise permitted or required by law.

5 How do we collect personal information?

- 5.1 We may collect personal information in a number of ways, including:
- (a) Directly from you, for example, when you:
 - (i) create an Account or otherwise use the Platform;
 - (ii) submit or accept a Quote or use Zed Vault for fund-holding and payment release;
 - (iii) upload project information, photos, videos or other documentation;
 - (iv) contact us by email, phone or through the Platform; or
 - (v) subscribe to our marketing lists or participate in promotions or surveys
 - (b) Through your use of our website and Platform, including via cookies and similar technologies (see section 9);
 - (c) From third parties, such as:
 - (i) identity and KYC service providers;
 - (ii) payment service providers and banks;
 - (iii) trade or business partners, referrers and professional advisers; and
 - (iv) publicly available sources (for example, ASIC or ABN registers).

- 5.2 We will only collect personal information by lawful and fair means and where it is reasonably necessary for our functions or activities (including operating Zed Vault and complying with legal obligations such as AML/CTF Laws).

6 Why do we collect, use and disclose personal information?

- 6.1 We may collect, use and disclose your personal information for purposes including:
- (a) Operating the Platform and Zed Vault, including:
 - (i) verifying your identity and Account;
 - (ii) establishing and administering your Account;
 - (iii) facilitating Quotes, variations, payments and disputes between clients and contractors;
 - (iv) holding, releasing and reconciling funds and disputes in the Zed Vault trust account; and
 - (v) maintaining records of Projects, payments and communications;
 - (b) Compliance and risk management, including:
 - (i) complying with AML/CTF Laws, Sanctions laws and other regulatory obligations;
 - (ii) preventing, detecting and investigating fraud, misuse and unlawful activity;
 - (iii) responding to lawful requests from regulators, law enforcement and courts; and
 - (iv) managing our legal and regulatory risk;
 - (c) Business operations, including:
 - (i) developing, testing, supporting and improving the Platform and our services;
 - (ii) training staff and monitoring quality;
 - (iii) performing data analytics, reporting and product development (on de-identified or aggregated data where possible);
 - (d) Marketing and communications, including:
 - (i) sending you service-related communications (for example, updates about your Account or changes to our Terms);
 - (ii) sending you marketing communications about Zed, Zed Vault or related services, where permitted by law; and
 - (iii) managing your marketing preferences and opt-outs.

- 6.2 If you do not provide certain personal information, we may not be able to open or maintain your Account, allow you to use the Platform or Zed Vault, or provide certain services to you.
- 6.3 You may opt out of receiving marketing emails at any time by using the unsubscribe link in our messages or by contacting us (see section 15). Service and transactional communications will still be sent where required.

7 To whom do we disclose personal information?

- 7.1 We may disclose your personal information to:
- (a) Other Platform users – to the extent reasonably necessary to facilitate a Project, Quote, variation, dispute or payment between a client and contractor.
 - (b) Our service providers, including:
 - (i) identity and KYC/AML service providers;
 - (ii) payment processors, banks and other financial institutions;
 - (iii) cloud hosting, IT, cybersecurity and data storage providers;
 - (iv) professional advisers (lawyers, accountants, auditors, insurers); and
 - (v) customer support and analytics providers.
 - (c) Regulators, government agencies and law enforcement bodies, where required or authorised by law (for example, under AML/CTF Laws).
 - (d) Dispute resolution bodies, including mediators, arbitral institutions and courts/tribunals in connection with dispute resolution under our Terms & Conditions.
 - (e) Entities involved in a business transaction with us, such as a potential purchaser of all or part of our business (subject to appropriate confidentiality protections).
- 7.2 We require third-party service providers to handle personal information in a manner consistent with this Privacy Policy and applicable privacy laws.

8 Do we disclose personal information overseas?

- 8.1 Some of our service providers (for example, cloud hosting, email, analytics or KYC vendors) may be located outside Australia or may store data on servers located overseas.
- 8.2 The countries in which such recipients may be located are likely to include (but are not limited to) New Zealand, Singapore, the United States, member states of the European Union and other jurisdictions where our cloud or technology providers host their services.
- 8.3 Where we disclose personal information overseas, we will take reasonable steps to ensure that the overseas recipient does not breach the APPs in relation to your personal information, or that another exception applies under the Privacy Act.

9 Cookies, analytics and online tracking

- 9.1 When you visit our website or use the Platform, we may use cookies and similar technologies to:
- (a) recognise your browser or device;

- (b) remember your preferences;
 - (c) monitor and improve our website and Platform performance; and
 - (d) perform analytics on how users interact with our services.
- 9.2 We may use third-party analytics tools (for example, Google Analytics) which collect information such as IP address, browser type, pages visited and time spent on the site. This information is usually aggregated and does not personally identify you.
- 9.3 Most browsers allow you to refuse or delete cookies. If you disable cookies, some features of our website or Platform may not function properly.

10 Storage and security of personal information

- 10.1 We take reasonable steps to protect the personal information we hold from misuse, interference and loss, and from unauthorised access, modification or disclosure. These steps include:
- (a) physical security measures (such as restricted access to offices and secure storage);
 - (b) technical measures (such as firewalls, encryption in transit where appropriate, access controls and logging); and
 - (c) organisational measures (such as staff training, role-based access and policies on data handling and retention).
- 10.2 Personal information may be stored in electronic form on secure servers (including cloud-based services) and in limited cases in hard copy. Where we use third-party data centres or cloud providers, we require them to implement appropriate security standards.
- 10.3 We retain personal information for as long as reasonably necessary for the purposes described in this Privacy Policy or as required by law (for example, financial record-keeping and AML/CTF record retention obligations). When it is no longer required and it is lawful to do so, we will take reasonable steps to de-identify or securely destroy it.

11 Access to and correction of personal information

- 11.1 You may request access to the personal information we hold about you, or ask us to correct information that you believe is inaccurate, out-of-date, incomplete, irrelevant or misleading.
- 11.2 To make such a request, please contact us using the details in section 15. We may need to verify your identity before we provide access or make corrections.
- 11.3 We will respond to your request within a reasonable period (usually within 30 days). We may refuse access, or refuse to correct information, in circumstances permitted by the Privacy Act. If we refuse, we will tell you why in writing and explain how you can complain.
- 11.4 If we correct information about you and we have previously disclosed that information to others, you may ask us to notify those recipients of the correction, where it is reasonable and lawful for us to do so.

12 Links to third-party sites and services

Our website and Platform may contain links to websites or services operated by third parties. Those websites and services are not controlled by us and may have their own privacy policies.

We are not responsible for the privacy practices of third parties and encourage you to review their policies before providing them with your personal information.

13 Direct marketing

- 13.1 We may use your contact details to send you marketing communications about Zed, Zed Vault and related services, where permitted by law.
- 13.2 You may opt out of receiving marketing communications at any time by using the unsubscribe link in our emails or by contacting us (see section 15). Even if you opt out, we may still send you non-marketing communications, such as service messages and important updates about your Account or the Platform.

14 Changes to this Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in law or our information handling practices. The updated policy will be made available on our website and will apply from the date it is posted. We recommend that you check our website periodically to ensure you are aware of our current Privacy Policy.

15 Questions, concerns and complaints

- 15.1 If you have any questions about this Privacy Policy or how we handle your personal information, or if you wish to access or correct your personal information, please contact us at: enquiries@zedfinancegroup.com
- 15.2 If you wish to make a privacy complaint, please contact us in writing and provide details of your concerns. We will investigate the complaint and respond to you within a reasonable period (usually within 30 days).
- 15.3 If you are not satisfied with our response, you may lodge a complaint with the Office of the Australian Information Commissioner (OAIC):

Website: <http://www.oaic.gov.au/privacy/privacy-complaints>

Phone: 1300 363 992

Email: enquiries@oaic.gov.au

Mail: GPO Box 5288, Sydney NSW 2001