



# Wealth99 AU – VERSION [2024.09]

## Privacy Policy

### 1. Introduction

---

The Wealth99 Exchange is operated by Dacxi Pty Ltd (“Wealth99”, “we”, “us”, “our”).

Wealth99 collects personal information in the course of doing business in Australia.

Wealth99 will value your privacy and strive to protect your personal information. In broad terms, “personal information” refers to any information or opinion from which a person’s identity could be reasonably ascertained. Information is not personal information where the information cannot be linked to an identifiable individual.

We are committed to complying with the *Privacy Act 1988* (Cth) (**Privacy Act**) in relation to all personal information we collect. Our commitment is demonstrated in this policy. The Privacy Act incorporates the Australian Privacy Principles (**APPs**). The APPs set out the way in which personal information must be treated.

This policy applies to any person for whom we currently hold, or may in the future collect, personal information.

We will only collect and use your personal information in accordance with this policy and our Terms and Conditions. If you need further information, please contact [hello@wealth99.com](mailto:hello@wealth99.com).

By visiting, accessing, or using the Wealth99 Exchange, you confirm that you are 18 years old or older, have the legal capacity to consent to this policy, and consent to us collecting, holding, using and disclosing your personal information in accordance with this policy.

### 2. The personal information we collect

---

The personal information we may collect differs, depending on the nature of our interaction with you.

If you are a user or prospective user of our services, we may collect, hold, use, disclose and store the following information:

- contact information;
- financial information;
- date and place of birth;
- your history of transactions and use of our products and services;
- details of enquiries or complaints that you make;
- banking details;
- employment history;
- government related identifiers, such as passport numbers and driver licence numbers;
- and
- any other personal information required to provide our products and services.



If you are a current or prospective contractor or agent or a prospective employee, we may collect and hold personal information about you, which may include:

- contact information;
- date of birth;
- employment history;
- tax file number information;
- insurance information and claims history;
- licence details;
- education details;
- driving history;
- banking details;
- government related identifiers such as passport numbers and driver licence numbers;
- any other personal information required to engage you as our contractor, agent or employee; and
- records of contact and details of enquiries, conversations or correspondence made or received with you.

If you are a user of our website, we may also collect information (that may include personal information) about how you access, use and interact with our website. This information may include:

- the location from which you have come to the site and the pages you have visited;
- technical data, which may include IP address, the types of devices you are using to access the website, device attributes, browser type, language and operating system; and
- page clicks, time spent and other automatically collected meta-data.

### **3. How we collect your personal information**

---

Wealth99 may obtain your personal information in various ways, including:

- when you register an account with Wealth99 through our website;
- when you respond to marketing initiatives from Wealth99 or our independent marketing partners;
- when you use our products or services;
- when you take part in customer surveys, competitions and promotions;
- by analysing your transactions and the payments that are made to and from your account;
- by monitoring calls, emails and letters when you call our helpdesk or send queries;
- through referrals from individuals and other entities;
- from third parties like banks, financial institutions and other creditors, credit reference agencies, government departments, or regulatory and enforcement agencies;
- from your representatives and advisers and current and previous employers,
- through our employees, contractors and agents;
- through marketing and business development events;
- from other sources to which you have given consent to disclose information relating to you; and

- from sources where your personal information is publicly available.

#### **4. How we hold your personal information**

---

Our usual approach to holding personal information includes:

- electronically:
  - on secure online servers;
  - on a private cloud;
  - by a third party data storage provider; and
  - on our website.

Wealth99 places the greatest importance on providing strict security measures to protect your personal information and our employees are trained to handle your personal information securely and with the utmost respect. We review and implement up to date technical and organisational security measures when processing your personal information to prevent misuse, interference or loss, and from unauthorised access, modification or disclosure.

Some of these processes and systems include:

- using secure servers to store personal information;
- using unique usernames, passwords and other protections on systems that can access personal information;
- arranging for our employees to complete training about information security;
- holding certain sensitive documents securely; and
- monitoring and reviewing our policies.

#### **5. Why we collect, hold, use and disclose your personal information**

---

We take reasonable steps to hold, use and disclose personal information for the primary purpose for which we collect it. The primary purpose for which we collect information varies depending on the individual that we are collecting the information from, but is generally as follows:

- in the case of customers and prospective customers:
  - to provide our products and services;
  - to verify your account in accordance with Know Your Customer (**KYC**) and Anti-Money Laundering (**AML**) regulations;
  - to assess your application for our products and services;
  - to manage and maintain your account with us;
  - to manage and perform any contract entered into with you;
  - to better manage our business and your relationship with us;
  - to enable your referrer to understand your information;
  - to improve our products and services and to develop new products and services;
  - to notify you about benefits and changes to the features of products and services;
  - to administer offers, competitions, events and promotions;
  - to provide personalised marketing to you;
  - to respond to your enquiries and complaints and to generally resolve disputes;
  - to update, consolidate and improve the accuracy of our records;

- to produce data, reports and statistics, which have been anonymised or aggregated in a manner that does not identify you as an individual;
- to conduct research for analytical purposes, including but not limited to, data mining and analysis of your transactions with us;
- to meet the disclosure requirements of any law binding on us;
- to ensure compliance with legislative and regulatory requirements;
- for audit, compliance and risk management purposes;
- to assess financial and insurance risks;
- to conduct AML checks, for crime detection, prevention and prosecution;
- for any other purpose that is required or permitted by any law, or relevant regulatory authorities.
- in the case of a current contractor or agent, to assist us in providing our products and services;
- in the case of a prospective contractor, agent or employee, to assess your suitability for employment or engagement; and
- in the case of other persons that contact us (including users of our website), to assist us to respond to your enquiries or complaints.

Personal information may also be collected, held, used or disclosed by us for secondary purposes that are within your reasonable expectations and that are related to the primary purpose of collection.

Please be assured that we will ask for your consent before using your personal information for purposes other than those set out in this policy and the Terms and Conditions.

## **6. Disclosure of your personal information**

---

We may disclose information about you or your account details to:

- banks, payment service providers and KYC partners;
- our contractors, agents, employees and related entities;
- our professional advisers, external auditors, brokers and insurance providers;
- employers of individuals;
- your advisers;
- organisations and companies that assist us in processing or otherwise fulfilling transactions that have been requested;
- law enforcement;
- regulatory and government agencies and departments;
- our affiliates who may or may not have introduced you to Wealth99; and
- third parties considering a potential transaction involving our assets, business or securities.

We will only disclose your personal information if:

- we have received express consent to the disclosure, or consent may be reasonably inferred from the circumstances;
- we are required or permitted to do so by law;



- we are required or authorised by any order of a court or tribunal with jurisdiction over Wealth99;
- we are required to do so to meet our obligations to any relevant regulatory authority; or
- we are otherwise permitted to disclose the information under the Privacy Act.

## **7. Disclosure of your personal information outside Australia**

---

Dacxi Pty Ltd is registered and operates in Australia, but we use the services of a number of third parties that are based outside Australia. Accordingly, your personal information may be stored, transferred, and processed in countries outside of the country of your residence. For example, we disclose information to:

- Intercom, which uses data centres located in the United States of America;
- Zendesk, which uses data centres located in the United States of America, Ireland, Germany and Japan; and
- Google, Facebook, LinkedIn and Instagram, which use data centres located outside of Australia; and
- Hubspot, which uses data centres located in the United States of America and Germany.

We take the utmost care when we're transferring your personal information.

Where we disclose your personal information to parties located overseas (or which have data centres located in other countries), we take reasonable steps to ensure that those parties will handle the personal information in accordance with the APPs. We are not required to take such steps if we believe that the overseas recipient is already subject to a law that has the effect of protecting personal information in a substantially similar way to the relevant law in Australia, or with your consent.

## **8. The retention of your personal information**

---

Wealth99 will retain information in compliance with this policy and the Terms and Conditions for the duration of your relationship with us, and afterwards for such period as may be necessary to protect the interests of Wealth99 and its customers, and as required by Wealth99's relevant policies and the law.

## **9. How you can access and update your personal information**

---

You have a right to access and correct your personal information. Please contact Wealth99 customer support to do this. Wealth99 will take steps to verify your identity before fulfilling the request.

In the case of changes to your personal information or where it has not been updated, you will need to contact Wealth99 support to update your personal information. Wealth99 may use its discretion in allowing the corrections requested and may require further documentary evidence of the new information to avoid fraud and inaccuracy.

We may deny access to personal information if:

- the request is unreasonable;
- providing access would have an unreasonable impact on the privacy of another person;
- providing access would pose a serious and imminent threat to the life or health of any person; or
- there are other legal grounds to deny the request.

We may charge a fee for reasonable costs incurred in responding to an access request. The fee (if any) will be disclosed prior to it being levied.

If the personal information we hold is not accurate, complete and up-to-date, we will take reasonable steps to correct it where it is appropriate to do so.

## 10. Chatbot Integration

---

Our website/app includes a chatbot feature powered by Hubspot, designed to provide assistance, answer questions, and improve your experience with our services. This section outlines how we handle your information when you interact with our chatbot.

### Information Collection

When you interact with our chatbot, we may collect the following types of information:

- **Personal Information:** Your name and email address. More sensitive information will be collected through an external link handled by our Customer Support (CS) team.
- **Chat Data:** Messages, questions, responses, and any other interactions with the chatbot.
- **Usage Data:** Information about your use of the chatbot, such as session duration, frequency of use, and navigation patterns.

If cookies are not accepted and you do not consent to data collection, any data collected during your interaction will be lost upon refreshing the page.

### Purpose of Data Collection

The information collected through the chatbot is used to:

- Provide and improve the chatbot service.
- Speed up service and automate part of our customer service processes through the Customer Support team.
- Respond to your inquiries and provide customer support.
- Analyse chatbot performance and enhance our services.
- Detects and prevents any fraudulent or malicious activity.

### Data Sharing and Disclosure

We will not share your chatbot interactions with third parties except in the following circumstances:

- With service providers, including Hubspot, who assist us in operating the chatbot, under strict confidentiality agreements.

- If required by law or to comply with legal processes.
- To protect the rights, property, or safety of Wealth99, our users, or others.

### **Data Retention**

Chatbot interaction data is retained for as long as necessary to fulfil the purposes outlined in this policy or as required by law. You may request deletion of your personal data at any time by contacting us at [hello@wealth99.com](mailto:hello@wealth99.com). We are capable of deleting or amending any information collected by the chatbot; for example, when finalising tickets, we can delete customer data, but it is important to preserve the history for future assistance.

### **User Rights**

You have the right to:

- Access and receive a copy of your personal data collected through the chatbot.
- Request correction of any inaccurate or incomplete information.
- Request deletion of your data or restrict its processing.
- Withdraw your consent for data processing at any time.

## **11. How you can make a complaint**

---

If you would like to complain about an interference with your privacy, then you must follow the following process:

- The complaint must first be made to us in writing, using the contact details contained in this policy. We will have a reasonable time to respond to the complaint.
- If the privacy issue cannot be resolved, you may take your complaint to the Office of the Australian Information Commissioner.

## **12. Changes to this policy**

---

This policy may be revised, updated, modified or removed from time to time without prior notice.

## **13. Contacting us about your information or this Privacy Policy**

---

If you have any questions, complaints or requests in relation to this policy or how Wealth99 handles your personal information, please contact us at [hello@wealth99.com](mailto:hello@wealth99.com) and state "Data Protection" in the subject line.