## **Privacy Policy and Complaints**



#### **Armchair Advisors Privacy Policy**

ArmchairAdvisors.com.au (and all affiliated websites, blogs, social media pages and information services owned and operated under the Armchair Advisor brand banner, all of which shall in this article be henceforth collectively referred to as ArmchairAdvisors.com.au, together with "we" or "us" or "our"), acknowledges how important it is to protect the rights and privacy of all individuals when it comes to their Personal Information. This policy as is detailed herein will explain the methods of how and when we collate and manage your Personal Information.

Your rights to Privacy, as well as what is required in terms of the collecting of, management of and disclosure of anything considered to be your Personal Information is detailed in full within the Privacy Act 1988 (Cth) ("Act"). You are welcome to visit <a href="www.oaic.gov.au">www.oaic.gov.au</a> for more information.

#### **Your Personal Information**

The phrase, "Personal Information" (as used throughout this policy) carries with it the meaning attributed to it under the relevant Act as listed above. It will include any and all information that could be potentially used to identify you personally. Information of this nature may include your name, contact details including telephone number, email address or social media profile information, or physical information relating to your occupation and/or address. Information will be considered Personal Information if the information that we have collected can identify you personally, or if you are able to be reasonably identified from it.

#### Different types of Personal Information we collect

Types of Personal Information we may collect can include your:

- 1. name, residential, employment, contact information including telephone, mailing and email addresses;
- 2. date of birth, gender, age, hobbies/interests, income, purchase history, occupation;
- 3. details of products and services you have either enquired about or purchased from us, any further information given in order to respond to your enquiries or deliver the relevant services and/or products;
- 4. information of any other nature that relates to you and is provided by you either directly or indirectly to us or our representatives from time to time.

### Other information that may be collected

We collect anonymous information on the activity of our website(s). This data is used by us in the evaluation of our websites and digital media pages' performance, and to improve the

quality and relevance of the content you see from us. To evaluate the effectiveness of our website(s), the services of third parties may be utilised by us strictly for the purposes of collating and collecting statistical data. When these occasions occur, no Personal Information of yours is collected. IP addresses (which are the digital address of any computer or internet capable device that is connected to the internet) may also be gathered with the goals of analysing trends, better improving our website(s), tracking users' movements, and gathering wide-ranging demographic information.

Our website(s) uses Google AdWords, Google AdSense, Google Analytics, and the Google Display Network in conjunction in order to present ads to you on other websites than ours, after you have visited our website(s). This is defined as remarketing and is a legal tool that is offered by Google to businesses such as ours. If you would prefer to not receive advertising like this from Google, you can alter these settings by visiting the <a href="Google Ads Preferences">Google Ads Preferences</a> Manager.

### The collection of your Personal Information

Your Personal Information is obtained directly from you unless doing so is not reasonable or is impracticable. We may collect Personal information through methods including (but not limited to) to:

- your accessing and use of our website on desktop and mobile platforms;
- conversations had between our representatives and you;
- online purchases (made by you both directly with ArmchairAdvisors.com.au and/or its' affiliated partners);
- enquiries made by you for further information on services and/or products, or by the registering of your details on our website(s);
- your participation in our surveys and other similar research methods;
- your entering into of promotions, sweepstakes, or contests as hosted by us;
- your subscription to any of our mailing lists; or
- your providing of information to us via any of our social media pages (including Facebook, Instagram or Twitter).

Information collected from Third Parties such as law enforcement agencies, financial services and credit reporting agencies, and other relevant government agencies may also be gathered.

#### **Cookies**

Our website also utilises cookies (a webpage tracking technology) to identify your unique internet browser each time it visits our site(s), and to track which pages your device visits whilst on our web pages. This information is used to optimise web performance and to improve the UX (user experience) for our customers. Information from cookies is usually transferred from a website to a computer's hard disk for the purpose of record keeping. Web browsers are ordinarily set up to accept standard tracking technologies such as cookies. These aforementioned tracking technologies do not personally profile specific site

visitors, but do identify specific browsers. If you wish to opt out of receiving cookies, you can alter your browser to refuse them.

## In instances where we cannot collect your Personal Information

If for whatever reason that you do not provide us with the Personal Information as described in the above sections, the following occurrences may happen:

- we may be unable to provide to you, at any standard or even at all, the requested products or services;
- we may be unable to furnish you with information regarding our specific services and/or products; or
- we may find ourselves unable to personally tailor the content of our website(s) to you in a manner that you would prefer, thereby rendering our website(s) less useful to you.

## Reasons why we collect, store, use and disclose your Personal Information

Your information is collected, stored and disclosed in order to understand your consumer needs better and also to provide you with an improved service. Your Personal Information may be shared with Related Bodies Corporate as outlined in the Corporations Act 2001 (Cth). Your Personal Information may also be collected, held and disclosed by us:

- in order to complete a transaction online through our website(s) and/or social media pages, and in order to successfully deliver services and/or products to you;
- in order to address your customer service issues and queries using the various communication methods at our disposal.
- so as to implement business activities including the provision of Personal Information to our Related Bodies Corporate, as well as any contractors, service providers or other third parties that are relevant;
- whenever we are directly responding to social media communications;
- in order to keep you informed about our services and/or products, as well as
  particular events and/or promotions we believe may be of interest to you, the
  consumer. You can choose to remove yourself from the scope of our marketing
  activities at any time;
- so that we may improve your UX with us and in order to assist us with finalising your transactions in the most timely fashion possible;
- in order to to facilitate to you access to particular areas of our website(s); and
- when we are conducting future planning, marketing and/or research purposes.

Your Personal Information will not be shared, sold, rented or disclosed other than as is expressly described in this Privacy Policy.

#### The disclosure of your Personal Information

Your Personal Information may be disclosed by us:

- to our Related Bodies Corporate, our employees and registered associates, our
  affiliated contractors and/or to service providers for the specific purposes of
  maintaining and operating our business, website(s) and social media pages, when we
  are fulfilling requests of a communication, information and/or financial nature as
  made by you, and to also provide services and/or products to you that will by
  necessity include, with no limitations, IT systems administrators, web hosting
  providers, payment processors, data entry service providers, mailing houses,
  electronic network administrators and professional advisors (such as accountants,
  lawyers, and business advisors);
- to other applicable third parties and/or suppliers with whom we have commercial relationships for the purposes of business, marketing etc., etc.;
- to any organisation for any authorised purpose with your express consent; and
- so as to comply with any and all relevant laws and legislation.

Personal Information may potentially be transmitted to our Related Bodies Corporate, third party suppliers and service providers who may potentially dwell overseas for some, or all of the purposes as has been listed above. We guarantee that all reasonable steps are taken by us to make certain that any and all overseas recipients of your Personal Information do not and will not commit any breaches of the privacy obligations that directly relate to your Personal Information.

#### **Marketing materials**

Occasionally, you may receive marketing communications and/or information concerning our services and/or products that we believe may be of interest to you. These communications from us may be sent to you via mail, email, SMS, social media, and/or facsimile and in accordance with all relevant and applicable laws, such as the Spam Act 2003 (Cth). We will do our best to implement your preferred methods of communication where you have indicated as such, and whenever it is practical for us to do so.

You can opt out of our marketing communications by contacting us at <a href="mailto:contact@armchairadvisors.com.au">contact@armchairadvisors.com.au</a>, and expressly detailing your request to opt out of our marketing communications.

We do not and will not provide your Personal Information to other organisations for the purposes of their direct marketing to you.

# The access to and the correction of your Personal Information

Requests for you to access any Personal Information of yours held by us can be made by contacting our Privacy Officer via the contact details below. In the instances that you are

entitled to access your information held by us, we will work to furnish you with all relevant information in a format deemed suitable (email or mail, for example). A fee of not more than \$20.00 AUD may also be charged to you, by us, for the purposes of covering our reasonable costs that are incurred when providing this information to you. There will be not be any charge incurred by you whenever you make a simple request to us, or when you are making any appropriate corrections to your Personal Information as held by us.

There may occur particular instances in which access to the Personal Information of yours that is held by us may not be granted to you. In these instances, please understand that we must refuse to you access, if the act of granting access would create a potential interference with the privacy of the information collected from other users/consumers, or if it were to create a breach of confidentiality. We will clearly detail to you the reasons for such a refusal, should one occur.

If you have reason to believe that we are in possession of Personal Information about you that is incorrect, inaccurate or incomplete, then you may ask us to amend it. If after due consideration, we ascertain that the information in question requires us to amend it, we will do so. However, in the event that there is a disagreement as to the presence of reasonable grounds for the amendment of your Personal Information, then we will add a note to the aforementioned Personal Information that clearly highlights your disagreement with it.

#### **Breaches of privacy**

In any event that you hold a belief that your privacy and/or Personal Information has been breached, please feel free to get in touch with the Privacy Officer (contact details listed below) and provide to us specific details of the incident in question so that we may investigate it in a timely fashion. Such an investigation of privacy breaches may include: initial assessment; the undertaking of quick and direct action so as to contain the breach; the coordination of a response by duly designated person(s); analysis of the Personal Information involved; the determination of whether the context of this Personal Information is important; the determination of the factors that resulted in the breach and the extent to which it has occurred; the identification of any risk of harm (if any exists); the undertaking of a thorough risk analysis (if required) and failure analysis (if required) and the determination as to whether notification is required on our behalf.

### Usage of third party websites

Links to any and all third party websites located on our website(s) are located there purely as a convenience to you the consumer. The act of following these links results in you leaving the particular ArmchairAdvisors site you were on prior. Should you do so, we hold no responsibility for the actions of any third party websites, the content contained therein or their usage of your Personal Information.

#### Security

We promise to take every reasonable precaution to secure the security of your Personal Information and to protect this information from potential loss, alteration and/or misuse.

#### **Changes to Privacy Policy**

ArmchairAdvisors.com.au may make changes to this Privacy Policy from time to time for any reason. Any changes made by us will be published on our website. This policy was last updated on 22/02/2020.

### **Contacting us / Privacy Officer**

If you have any questions relating to this Policy, or if you have any concerns or complaints that relate to your Personal information, or that pertain to a possible breach thereof, please contact our Privacy Officer using the details listed below. All requests or complaints will be treated in confidentiality, and you will be contacted by one of our representatives within a reasonable time after we have received your request or complaint, so as to discuss your concerns and options for resolution. We will work to resolve any and all complaints in a timely and appropriate fashion.

#### ArmchairAdvisors.com.au Privacy Officer contact details:

Email: contact@armchairadvisors.com.au

This is not a bookmaking and wagering site, no bets are received. We only provide a tipping service, all information contained within not being defined as 'financial advice,' in any way, shape or form. By becoming and/or acting upon the tipping/betting information communicated by ArmchairAdvisors.com.au, you acknowledge and agree that you will only place bets with licensed betting service providers. For help call 1800 858 858 or your local State gambling helpline, Gamblers Help, Mission Australia or visit www.gamblinghelponline.org.au

