# **Privacy Policies**

# **Table of Content**

Table of Content	2
Terms used in this policy	3
Purpose of this policy	3
Information we collect	3
Use of your personal information	4
Security and Retention	5
Loss of personal information	5
Complaints	5
Office of Australian Information Commissioner (OAIC)	6
Changes	6
Contact Us	6

#### 1. Terms used in this policy:

Term	Meaning
We, our, us	FR Global Pty Ltd
You, Your	FR Global Pty Ltd Customers

#### 2. Purpose of this policy

This privacy policy aims to provide information about the personal information we collect, how that information will be handled, and how we provide access to personal information per the Privacy Act 1988 and other applicable laws and codes.

We comply with the Privacy Act 1988, which contains provisions designed to safeguard personal information about their customers. The Privacy Act 1988 requires us to comply with privacy principles set out in that Act. Personal information is any information that we use to identify a living person. This may include names, addresses, dates of birth, gender, phone numbers, or employment details.

Collecting your information is essential to service the relationship and the business operations. Without Personal Information, we could not provide you with the products and services, enter into contracts or undertake transactions with you.

#### 3. Information we collect

- 1. We collect and store all information electronically on Australian-based secured storage per our company's Information security policy<sup>[1]</sup> and take all reasonable steps to protect information from unauthorised access. Still, we cannot accept liability for unauthorised access or use of your personal information.
- Information that you provide us in the course of using the Services and Products
  provided by us. We may also collect sensitive information from you, including
  your bank account number, credit or debit card number, and date of birth;
- 3. To facilitate our Service or Product, we request certain third-party Personal Information from you, such as your Beneficiary or Recipient's full name, mailing address, email address, telephone number, date of birth, nationality, etc. We may also collect from you the sensitive financial information of a Beneficiary or a Recipient, including bank account numbers;
- We lawfully obtain information from third parties, such as Service Companies, Document verification service providers, electronic database services, and credit reporting agencies;
- 5. We may collect the following types of personal information from you:
  - i. Full Name and Alias
  - ii. Address
  - iii. Date of Birth
  - iv. Occupation

- v. Contact details (mobile number, email)
- vi. Financial Information such as bank account name and number
- 6. Any other information we may collect with your approval, as permitted or required by law and in compliance with Australian Privacy Laws. If you are an entity, then, by applying for any Services or products provided by us, you agree and consent to the following matters. If you supply us with Personal Information about an individual, you agree to inform that person:
  - i. We hold information about that person, who can contact us at any of our offices.
  - ii. Personal Information collected about that person will be used for the primary purpose of accessing your application for the requested service and, if your application is approved, for the initial establishment of the service and then for the subsequent administration and eventual finalisation of your service and that without that Personal Information, this purpose cannot be fulfilled.
  - iii. Personal Information collected about that person will usually be disclosed to our business partners and us.
  - iv. That person has the right to access and correct Personal Information.
- 7. We are committed to protecting the personal information of our Customers. We will never request you to disclose your personal information via unauthorised emails or SMS.

#### 4. Use of your personal information

Your Personal information is not used for any third-party marketing purposes or sold to any other entity. We collect, use, hold, and disclose your personal information for the following purposes:

- 1. To process and complete your service request/s, our service staff, business partners, and agents.
- 2. To identify you and verify your identity from third parties, such as Service Companies, Document verification service providers, electronic database services, and credit reporting agencies:
- 3. Check your eligibility to use the services and products offered by us;
- 4. To collect payment for your use of the Service;
- 5. To reconcile the service payments
- 6. To troubleshoot problems with the service;
- 7. To allow our partners to fulfil their promotional obligations to you;
- 8. To monitor, review and improve our services;
- 9. To monitor compliance and comply with AML CTF Act 2006 and AML CTF Rules;
- 10. To Prevent money laundering, terrorism financing, fraud, and other illegal uses of the service.
- 11. We might use your personal information to
  - Train our staff in risk management and record keeping;
  - Maintain a good relationship with our customers; and

Comply with other legal regulations or as permitted by any laws.

#### 5. Security and retention

We apply technical, physical, and administrative data security measures to protect your personal information from loss, misuse, unauthorised access, modification, alteration or disclosure. Once our dealing with you is completed, we will take reasonable steps to delete or permanently erase the personal information if not required further. We take all necessary steps to ensure we keep your information secure, for example, by:

- 1. Encrypting our services via a secure 256-bit SSL encryption and digital archiving;
- 2. Adequately trained staff on privacy matters and data protection;
- 3. The database server is only accessible to applications over a secure private network.
- 4. We maintain the servers at secure locations regularly tested by internal and external technical experts.
- 5. We are obliged to comply with the AML/CFT Act and the Privacy Laws; personal identity information is retained for seven years. We will destroy, erase, or make your personal information anonymous when it is no longer required per the Law.

#### 6. Loss of personal information

We maintain adequate data security measures to protect information against unauthorised access and disclosure; despite our efforts, the chances of a security breach cannot be completely ruled out. In the event of loss of personal information, We will:

- 1. Identify and prevent further breaches at the earliest instance possible.
- 2. Assess the nature and severity of the breach, including the type of personal information involved and the risk of harm to affected individuals.
- 3. Alert the affected individuals if required.
- 4. Engage appropriate authorities if criminal activity is suspected
- 5. Notify the Privacy Commissioner (at the OAIC) if the breach is significant

## 6. Complaints

If you have a complaint about our handling of personal information, we request you to contact us first. We will follow it with our Internal Dispute Resolution team and respond within 30 days, wherever possible. If the matter proves to be complex, we may advise you to put the complaint in writing.

To complain, please contact us via our email:

We do our best to resolve the matter in a timely fashion. You will be advised in writing if we cannot resolve the matter promptly due to its complexity.

## 7. Office of Australian Information Commissioner (OAIC)

The Office of the Australian Information Commissioner (OAIC) can investigate privacy complaints from individuals about Australian and private sector organisations covered by the Privacy Act 1988 (Privacy Act). Before you can complain to the OAIC, you will generally need to complain directly to the agency or organisation you are complaining about and allow 30 days for it to respond. If you do not receive a response (after 30 days) or are dissatisfied with the answer, you may complain to the OAIC.

You can contact OAIC by visiting www.oaic.gov.au; emailing to enquiries@oaic.gov.au; or calling 1300 363 992, If calling from outside Australia call: + 61 2 9284 9749, or writing to OAIC, GPO Box 5218, Sydney, NSW – 2001 Or / OAIC, GPO Box 2999, Canberra, ACT- 2601

## 8. Changes

Please be aware that we may change this Privacy Policy in the future. The revised versions will be uploaded onto our website, so please check back occasionally.

#### 9. Contact Us

Please contact us by email if you have any questions or concerns about our privacy practices.

You can find email on our Contact Us page.