

## Privacy Policy

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### 1. WHAT IS "PERSONAL INFORMATION"?

- 1.1. The *Privacy Act* 1988 (Cth) ("Act") currently defines "Personal Information" as meaning information or an opinion about an identified individual or an individual who is reasonably identifiable: (i) whether the information or opinion is true or not; and (ii) whether the information or opinion is recorded in a material form or not.
- 1.2. If information does not disclose your identity or enable your identity to be ascertained, it will in most cases not be classified as Personal Information and will not be subject to this Privacy Policy.
- 1.3. Throughout this Privacy Policy, "you" or "your" refers to the individual visiting the Website, purchasing the goods or using the services.
- 1.4. Throughout this Privacy Policy "we" or "us" refers to GeoCommodities ("GC").

### 2. KINDS OF INFORMATION WE COLLECT AND HOLD

- 2.1. The Personal Information which we collect and hold about you may include: (i) full name, (ii) residential address, (iii) postal address, (iv) email address, (v) mobile numbers, (vi) landline numbers, (vii) fax numbers, (viii) online platform login details, (ix) bank account details, (x) other confidential information.
- 2.2. Email addresses may be used for marketing purposes, which you have the ability to opt out of at any time.
- 2.3. "Sensitive Information" is defined in the Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information. We do not seek to collect or hold any sensitive information.

### 3. HOW WE COLLECT AND HOLD YOUR PERSONAL INFORMATION

- 3.1. Personal Information is obtained in many ways directly from You including by contact forms, interviews, correspondence, by telephone, by email, via our Website, from media and publications, from other publicly available sources, from cookies and from third parties.
- 3.2. Where reasonable and practicable to do so, we will collect your Personal Information from you only. However, in some circumstances we may be provided with information by third parties. In such a case, we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.
- 3.3. Your Personal Information may be stored digitally and/or physically in a manner that reasonably protects it from misuse and loss and from unauthorised access, modification or disclosure. This includes your Personal Information being stored in the cloud via our online platforms.
- 3.4. Some Personal Information collected may be stored in client files which will be kept by GC for a minimum of 7 years.
- 3.5. When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information.
- 3.6. We also collect cookies from your computer which enable us to tell when you use the Website and also to help customise your Website experience.

#### **4. PURPOSE OF COLLECTING, HOLDING AND DISCLOSING**

- 4.1. We collect and hold your Personal Information for the primary purpose of providing our services to you and for marketing purposes. We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure.
- 4.2. In the event that we were to receive any "Sensitive Information", as defined in the Act, it will be used by us only: (i) for the primary purpose for which it was obtained; (ii) for a secondary purpose that is directly related to the primary purpose; (iii) with your consent; or (iv) where required or authorised by law.
- 4.3. Your Personal Information may be disclosed in a number of circumstances including the following: (i) third parties where you consent to the use or disclosure; (ii) where required or authorised by law; and (iii) as referred to in clause 4.2 for the purposes of delivering our service.
- 4.4. We customarily disclose Personal Information only to our service providers who assist us in operating the Website. Your personal information may also be exposed from time to time to maintenance and support personnel acting in the normal course of their duties.

#### **5. ACCESS AND CORRECTION**

- 5.1. Australian Privacy Principles permits you to obtain access to your Personal Information in certain circumstances and allows you to correct inaccurate Personal Information subject to certain exceptions. If you would like to obtain such access, please contact us by email as set out below.
- 5.2. We will not charge any fee for your access request, but may charge an administrative fee for providing a copy of your Personal Information.
- 5.3. In order to protect your Personal Information we may require identification from you before releasing the requested information.

#### **6. MAINTAINING THE QUALITY OF YOUR PERSONAL INFORMATION**

- 6.1. It is important to GC that your Personal Information is up to date. GC will take reasonable steps to make sure that your Personal Information is accurate, complete and up-to-date.
- 6.2. If you find that the information GC have is not up to date or is inaccurate, please advise us as soon as practicable by contacting us at our contact provided at clause 10 of this Privacy Policy so we can update our records and ensure we can continue to provide quality services to you.
- 6.3. We may decline your request to access or correct your Personal Information in certain circumstances in accordance with the Australian Privacy Principles. If we do refuse your request, we will provide you with a reason for our decision and, in the case of a request for correction, we will include a statement with your Personal Information about the requested correction.

#### **7. COMPLAINT PROCEDURE**

- 7.1. If you have a complaint concerning the manner in which GC maintain the privacy of your Personal Information, please contact GC by email as set out in clause 10.
- 7.2. In most cases, we will investigate and respond to a complaint within 30 days of receipt of the complaint. If the matter is more complex or our investigation may take longer, you will be informed.
- 7.3. If you are not satisfied with our response to your complaint, or you consider that GC may have breached the Australian Privacy Principles or the Privacy Act, a complaint may be made to the Office of the Australian Information Commissioner. The Office of the Australian Information Commissioner can be contacted by telephone on 1300 363 992 or by using the contact details on the website [www.oaic.gov.au](http://www.oaic.gov.au).

#### **8. LIKELY OVERSEAS DISCLOSURE**

- 8.1. Your Personal Information will likely be disclosed by GC to overseas recipients in United States of America and Bangladesh for the purposes of providing GC's services to you.

- 8.2. Other than as set out in clause 8.1, your Personal Information will not be disclosed to recipients outside Australia unless you request us to do so.
- 8.3. Upon the transfer of your Personal Information to an overseas recipient, the overseas recipient will not be required to comply with the Australian Privacy Principles and we will not be liable for any mishandling of your information in such circumstances.

## **9. POLICY UPDATES**

This Privacy Policy may change from time to time and remains available on the Website. You are responsible for ensuring you are familiar with the most current version of this Privacy Policy.

## **10. HOW CAN YOU CONTACT GC**

- 10.1. The contact details for GC are:  
GC privacy officer: Brad Knight  
17 Darlot Street Horsham VIC 3400  
admin@geocommodities.com.au  
03 5381 1125

This Privacy Policy was last updated 22<sup>nd</sup> August 2023