

## iDeed Pty Ltd – Privacy Policy

We are iDeed Pty Ltd. Operators of the ARCGx platform which holds records of bank guarantees (“**Platform**”). The Platform is used to establish and create records, and communicate with other users of the Platform, in relation to bank guarantees that issuers, beneficiaries and applicants participating in the Platform have an interest in. This policy explains how we manage personal information when you use the Platform and within our organisation.

### Kinds of personal information we collect

The kinds of personal information that we collect and hold about you may include:

- identifying information, such as your first name and last name;
- contact information, such as your email address and telephone number;
- usernames, passwords and access codes that you create when registering to use the Platform; and
- records of our communications with you, including any messages you send us.

Without this information we may not be able to provide you with access to the Platform (or with all of the features and functionality offered by the Platform) or to respond to any queries or requests that you submit to us.

### How we collect personal information

We collect personal information about you in the following ways:

- directly from you (for example, when you log onto the Platform or submit a query or request to us);
- from your employer or another person who has authorised your use of the Platform;
- from third parties; and
- from publicly available sources.

### Purposes for which we use personal information

We use personal information that we collect about you for the following purposes to:

- operate the Platform, including to conduct testing and for related purposes;
- facilitate your use of the Platform (including answering your queries and requests);
- assess, maintain, upgrade and improve the Platform;
- comply with our legal and regulatory obligations;
- compile statistics and reports to improve the Platform and our services; and
- manage and resolve any legal or commercial complaints or issues.

We may also use and disclose your information for other purposes as authorised by you, or in accordance with your requests or instructions, or as required by law.

### People to whom we disclose personal information

We may share personal information about you with:

- other users of the Platform as required to facilitate your use of the Platform;
- your employer or any other person who has authorised you to interact with us on its behalf, and any representative or advisor of such a person;
- your representatives, advisers and others you have authorised to interact with us on your behalf;
- our staff who need the information to discharge their duties;
- our business partners, agents and service providers (including our technology providers);
- professional advisers who are engaged to provide advice relating to our business and/or the Platform (including, but not limited to, auditors); and
- government authorities who ask us to disclose that information, or to other people as required by law.

We will not disclose your personal information to anyone outside Australia.

### Storage and security of personal information

We take reasonable steps to ensure that any of your personal information which we hold is accurate, complete and up to date. These steps include promptly updating personal information when we are advised that the information has changed.

We store personal information for as long as it is needed for the purpose for which it was collected or as required by law. We generally store the personal information that we collect in electronic databases, some of which may be held on our behalf by third party data storage providers. We use a range of physical and technical security processes and procedures to protect the confidentiality and security of the information that we hold, and we update these from time to time to address new and emerging security threats.

### Access and correction

If you want to access any of the personal information that we hold about you or to correct some aspect of it (e.g. because you think it is incomplete or incorrect), please contact us using the contact details set out below. To protect the integrity and security of the information we hold, we may ask that you follow a defined access procedure, which may include steps to verify your identity. There may be cases where we are unable to provide the information you request, such as where it would interfere with the privacy of others or result in a breach of confidentiality. In these cases, we will let you know why we cannot comply with your request.

### Complaints

We try to meet the highest standards in order to protect your privacy. However, if you are concerned about the way in which we are managing your personal information please contact us using the contact details set out below. Complaints must be lodged in writing. We will deal with the matter within a reasonable time and will keep you informed of the progress of our investigation.

### Changes to this policy

We may make changes to this policy from time to time, to take into account changes to our standard practices and procedures or where necessary to comply with new laws and regulations. The latest version of this policy will always be available at our website [www.arcgx.com](http://www.arcgx.com)