



## **Ettle Privacy Statement**

### **Protecting Your Privacy**

Ettle Pty Ltd trading as Ettle ('Ettle', 'we', 'our' and 'us') is committed to providing you with the highest levels of customer service and to protecting your privacy. We are bound by the *Privacy Act 1988* (Cth) ('Privacy Act'), which sets out a number of principles known as the Australian Privacy Principles ('APP') concerning the protection of your personal information.

This privacy statement sets out the type of information we collect, how we use it and who we may share it with. It may be amended from time to time and the latest version will be updated on our website.

### **Who is Ettle?**

Ettle is launching a cash-backed Australian Dollar stablecoin that is fully banked, held in trust and redeemable with a multitude of use cases and will be independently audited to always ensure a cash backing for each and every stablecoin on issue.

### **What personal information do we collect?**

The personal information we collect and store may include your name, birth date, current and previous addresses, phone numbers, email addresses, profile information, preferences for using our websites, driver's license details, web log, computer, device and connection information, and (depending on the service) banking and credit card details.

### **How do we collect personal information?**

We collect personal information in a number of ways, including:

- directly from you through our websites;
- from other parties (such as your representatives, credit reporting agencies, social media sites, our related companies, our syndication partners);
- from publicly available sources;
- from organisations identified under "When do we disclose your personal information" (see below);
- from our own records of when you visit us online or where we have an online presence (such as LinkedIn, Twitter, Telegram, Facebook or Instagram);
- when we are required by law; and
- when you are online, we collect information regarding the pages within our network that you have visited and what you click on.

This is not an exhaustive list of information we may collect or store as it may depend on the service or product being offered. If you don't provide us with this information, unfortunately we may not be able to provide you with the service you require.

We usually collect personal information directly from you although sometimes we may use agents or service providers to do this for us. We may also get lists and business information that include personal information from other sources, both from other companies and from other public documents.

### **How do we use your personal information?**

Your personal information may be used to:

- verify your identity;

If you do not want Ettle to contact you to promote and market our products, services and special offers to you, please email [contact@ettle.com](mailto:contact@ettle.com) or opt out using the opt out option on the email you have received.

If you have subscribed to receive specific emails or SMS/MMS from us, you will continue receiving them unless you unsubscribe by following the instructions in these messages to cancel your subscription.

### **When do we disclose your personal information?**

We may disclose your personal information to other organisations, but we will only do this in relation to us providing our services to you or as otherwise set out in this policy. We take all reasonable steps to maintain the security of your personal information and to protect it from unauthorised disclosures.

Ettle has processes in place that require organisations to adhere to confidentiality obligations to protect your personal information.

**These organisations may be based locally or overseas. They may carry out functions for us such as:**

- customer enquiries;
- support functionality;
- billing and debt-recovery functions;
- information technology services;
- data verification services;
- marketing, telemarketing and sales services;
- market research; and
- website usage analysis.

In addition, we may disclose your personal information to:

- your authorised representatives or advisers (when requested by you to do so);
- credit-reporting and fraud-prevention organisations;
- credit providers (for credit related purposes);
- our related companies;
- our professional advisers;
- government, regulatory authorities and other organisations, as required by law;
- organisations who manage our business and corporate strategies, including those involved in a transfer/sale of all or part of our assets or business and those involved in managing our corporate risk and funding functions; and
- our directories and syndication partners.

When we share your information with a third party, we will require that the third party only use, store and disclose your information in a way that is consistent with this policy.

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

We take active steps to ensure that any overseas located organisation we disclose your personal information to complies with the APP or is subjected to laws which are substantially similar to the APP.

### **About our websites, IP addresses and cookies**

When you visit our sites, our web servers record anonymous information such as the time, date and URL of the request. This information assists us to improve the structure of our websites and monitor their performance. Sometimes we also use third parties to analyse this information.

We may use 'cookies' or an equivalent on various websites and applications. A cookie is a small text file that our websites and applications use to store information on your browser or device. Usually, cookies are used so our websites and applications can remember your preferences and improve your online experience. We also use cookies for profiling purposes to tailor advertising to users' interests.

Sometimes cookies may collect and store personal information about you. We treat this information in the same way as any other personal information you provide. You can adjust your internet browser to disable cookies or to warn you when cookies are being used. However, if you disable cookies, you may not be able to access certain areas or experience the added features offered with the enablement of cookies.

We also collect and manage Internet Protocol ('IP') addresses – the unique identifier on your computer or device. It's used for the purpose of providing internet session management and to detect any misuse or fraudulent activities involving our websites.

Ettele may use third parties to analyse usage data and statistics. Such analysis is performed using data collected from our websites. The technology is not intended to collect personally identifiable information, however in limited circumstances some personally identifiable information is collected, for example, an email address incorporated into a URL string.

Personally identifiable information collected in this way is not used by the third party or Ettle for any purpose.

### **Third party sites**

You may click-through to third party sites from our sites, in which case we recommend that you refer to the privacy statement of the sites you visit. Ettle's privacy statement applies to the Ettle websites and Ettle assumes no responsibility for information and content of third party sites.

### **How accurate is your information?**

We take all reasonable precautions to ensure that the personal information we collect, use and disclose is accurate, complete and up to date. However, the accuracy of that information largely depends on the details you give us. Please let us know if there are any errors and keep us up to date with any changes.

### **Access to your personal information and privacy complaints**

We take the protection of our customer's privacy very seriously. If you have any privacy concerns or believe that your personal information is inaccurate or has been collected, used or disclosed in a manner contrary to privacy law we encourage you to raise any concerns you have with us by emailing [contact@ettle.com](mailto:contact@ettle.com) so that we can take steps to address them.

In most cases we will ask that you put your request in writing to us. We will investigate your complaint and will use reasonable endeavours to respond to you in writing within 30 days of receiving the written complaint. If we fail to respond to your complaint within 30 days of receiving it in writing or if you are dissatisfied with the response that you receive from us, you may have the right, depending on the jurisdiction, to make a complaint to the applicable regulator.

### **Further information**

Further information on privacy is available at the website of the Office of the Australian Information Commissioner <http://www.oaic.gov.au/>.