

# PRIVACY POLICY

The "iFactFind" online software platform (the "Platform Website"), and the iFactFind general website located at <https://ifactfind.com.au> (the "Website") (the Website and Platform Website together, the "Platform"), is controlled and operated by PULSS Pty Ltd T/A iFactFind ("iFactFind").

## IMPORTANT WARNING

Users who do not consent to us collecting, handling, or using their Personal Information in accordance with this Privacy Policy, should not use this Platform. Users must obtain consent prior to inputting Third Party Personal Information into the Platform. If the relevant Third Party does not consent or otherwise agree with the terms of this Privacy Policy, Users should not collect and input the relevant Third-Party Personal Information into the Platform. We recommend that a User's own privacy policy is updated so as to obtain consent from any such Third Parties to our handling, collecting and using their Personal Information in accordance with this Privacy Policy.

We can be contacted via [support@ifactfind.com.au](mailto:support@ifactfind.com.au) with any questions about the application and scope of this Privacy Policy.

## DEFINITIONS

- Below are some key definitions used throughout this privacy policy (the "Privacy Policy");
- When we say "we", "our", or "us", we mean PULSS Pty Ltd T/A iFactFind (ABN 70 135 773 090), and our officers, employees, contractors, agents, licensees and other representatives;

- When we say "you" or "User", we mean any person who accesses, browses or uses the Website (whether or not that person has registered a user account via the Platform);
- When we say a "Third Party Personal Information", we refer to Personal Information supplied by a User that relates to an individual who is not that User.
- When we say "Third Party", we mean the individual who is identified or identifiable by the Third Party Personal Information;
- When we say "Output Data", we mean data and information which is generated by the Platform containing the Personal Information;
- When we say the "Privacy Act", we mean the Privacy Act 1988 (Cth) as amended by the Privacy Amendment Act 2000 (Cth) and the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth);
- When we say "Personal Information", we mean that term to include any information or opinion, whether true or not, about a person who is identified or whose identity can reasonably be established, not limited to information in a material form, and includes Sensitive Information (as defined in clause 3 below) and Third Party Personal Information (as defined above);

## SUMMARY

In order for us to operate the Platform, we need to handle Personal Information. We take privacy of Personal Information seriously. We comply with the Privacy Act as a matter of best practice.

This Privacy Policy sets out how we collect, handle and use Personal Information in connection with our operation of the Platform. The Privacy Policy should be read in conjunction with the Terms of Use for the Platform available at Terms of Use.

## 1. Application and Consent

This Privacy Policy applies to the way we handle, collect and use Personal Information in connection with the Platform.

If a User wishes to collect and input Third Party Personal Information into the Platform, the User must firstly obtain consent from the relevant Third Party and supply them with a copy of this Privacy Policy.

By using the Platform, you consent to our collection, use and disclosure of their Personal Information which is governed by the terms of this Privacy Policy and you warrant that you have obtained all relevant consents and permissions to provide us with any Third Party Personal Information you input into the Platform.

It is important that:

- Users who do not agree to the terms of this Privacy Policy should immediately stop using the Platform;
- Any Third Parties who do not agree to the terms of this Privacy Policy should not allow Users to input their Personal Information into the Platform;
- If a Third Party does not provide a User with consent or does not agree to us handling, collecting and using their Third Party Personal Information in accordance with this Privacy Policy, the User must not supply us with the Third Party Personal Information via the Platform;

## 2. Supply of Personal Information

Before supplying any Personal Information via the Platform, Users should ensure that there are no restrictions on them doing so.

We are not responsible for any mistake or negligence or other conduct on a User's part where they supply Personal Information which they are not entitled to supply, but we will take reasonable steps to destroy or de-identify any such wrongfully supplied Personal Information within a reasonable timeframe after they have given us notice.

### 3. What kinds of information do we collect on the Platform?

The kinds of Personal Information we may collect about Users and Third Parties include their name, address, e-mail address, telephone number, occupation, gender, age, date of birth, income, savings, insurance policies, bank accounts and financial information.

We may also ask a User to provide the following information:

- Information or an opinion about their health, including an illness, disability or injury, or a health service that has been or will be provided to them;
- Information about their racial or ethnic origin; and/or ("Sensitive Information");

We may also ask a User to provide the following information:

### 4. How do we collect Personal Information from Users?

We may collect Personal Information about Users from themselves or another User. We collect Personal Information where reasonably necessary for the proper function of the Platform.

The ways in which we may collect Personal Information include:

- When Users access the Platform Website using the internet;
- When Users register an account for use of the Platform;
- From third party payment services when details of a User's transactions on the Platform are provided to us;
- From Users as part of using the functionality of the Platform, such as by storing a Third Party's Personal Information in connection with operating a financial services business;
- When we receive enquiries or correspondence via the Platform or by e-mail;
- When Users sign up to the mailing list provided on our Website; and
- From Users through any use we may make of browser 'cookies' or trackers on the Website.

This Privacy Policy does not exhaustively list the ways in which we may collect Personal Information or the kinds of Personal Information we may collect.

## 5. How do we use Users' Personal Information once we have collected it?

Users agree that we may use or disclose Personal Information we collect for the following purposes:

- To understand usage trends and patterns and improve Users' overall experience of the Platform;
- To fix problems and respond to feedback and complaints;
- To enforce any agreements between a User and us, such as the Terms of Use;
- To allow us to run the Platform and perform administrative and operational tasks;
- To provide Users with Output Data and other relevant information;
- To provide personally unidentifiable data for academic research purposes;

Users agree that we will be entitled to disclose Output Data generated by the Platform (which may embody their Personal Information and Third Party Personal Information) to relevant Users and those Users shall have rights to distribute, copy and otherwise use the Output Data in accordance with the Platform T&Cs.

We will not sell or license any Personal Information to any third parties, however we may share and license non-personal statistical data to third parties, including analytics and research entities. We endeavour to aggregate this data in such a way as will de-identify individual Users.

In addition, the Privacy Act caters for particular situations called "Permitted General Situations" where Personal Information may be disclosed outside of the purposes listed above, such as to lessen or prevent a serious threat to public health or safety, or to assist in locating missing people. Other laws, or a court, might also legally compel us to disclose Personal Information.

## 6. How do we store Personal Information?

We may store Personal Information in a variety of ways including in the cloud or other types of networked or electronic storage.

We may store and make back-up copies of Personal Information to ensure that we are able to recover information if our systems experience a fault or outage.

## 7. Are we going to contact you with direct marketing?

We may use Personal Information to offer Users new products and services, notify Users of new developments to the Platform, or for other commercial communications from us. By continuing to use the Platform, Users hereby consent to receiving such marketing communications. In delivering such communications, we may contact Users via e-mail. If a User does not wish to receive direct marketing communications from us, that you may opt-out by contacting [support@ifactfind.com.au](mailto:support@ifactfind.com.au). We will always give Users an opportunity to opt-out of receiving future marketing communications.

We will not contact any Third Party for any of the purposes identified in this clause above unless we have the prior written consent of the Third Party.

## 8. Are we responsible for the way Users handle Third Party Personal Information?

We are not liable nor responsible for the way that Users collect, handle or use Third Party Personal Information. This is entirely the responsibility of the relevant User.

We cannot guarantee that Users (or any organisation of which they are associated) will treat Third Party Personal Information confidentially (whether it is incorporated into Output Data or not), as this is beyond our control.

## **9. How will our payment provider handle Personal Information?**

Any handling of Users' Personal information disclosed to any payment provider we may use via the Platform is out of our control and is entirely the responsibility of that payment provider. We will not be liable nor responsible for the payment provider's handling of Users' Personal Information.

We recommend that Users make enquiries as to how our payment provider will handle their Personal Information to be provided by that User (by, for example, requesting a copy of the payment provider's privacy policy).

## **10. Are we responsible for the privacy practices of other third parties, where we provide links to those third parties, or redirect Users to those third parties?**

This Privacy Policy applies solely to information collected by us with regard to the Platform. We take no responsibility for the privacy practices of any third parties that we may link to on the Platform.

## **11. Can Users and Third Parties access their Personal Information, and correct it if it is wrong?**

Individuals can ask us to provide them with a copy of the Personal Information we hold about them. They do not need a reason for asking, but we may charge them for our reasonable expenses for preparing and sending them a copy of the requested Personal Information. We will try to respond to any such request within a reasonable timeframe. If the request would have an unreasonable impact on the privacy of others, the information is commercially sensitive, giving access would be unlawful or the request is frivolous or vexatious, we may not give a User the Personal Information requested.

We will take reasonable steps to see that the Personal Information we collect and store about Users is accurate, up-to-date and complete. To assist us, Users and Third Parties

should provide correct details where requested for upload to the Platform, and let us know if they believe the information we have about them is inaccurate, incomplete, out-of-date or misleading. If Users or Third Parties believe the Personal Information collected or used by us or a third party is false or inaccurate, they have a right to have this information corrected and we will endeavour to do so within a reasonable timeframe, at no expense to the relevant individual.

## **12. How do we keep Personal Information secure?**

We take the security and safety of Users' Personal Information seriously. We will take all reasonable steps to protect Personal Information from misuse, interference and loss, and unauthorised access, modification or disclosure. Unfortunately, no data transmission over the internet can be guaranteed to be completely secure and we cannot guarantee that Users' Personal Information will only be viewed by persons who they wish to view their Personal Information. We also cannot guarantee that the Platform will be completely free from viruses, surveillance or interception.

We will take reasonable steps to destroy or de-identify Personal Information when we do not need it. However, it is each Users' responsibility to ensure that they do not provide us with any Personal Information that we did not request from them. We may retain and use de-identified information.

## **13. Do we use cookies, trackers and analytics?**

We may use "cookies" to store data on a User's device when they access the Platform. The information stored in the cookie would be used to identify a User's browser or device. We use this information in order to enable us to operate an efficient service, to track the patterns of behaviour of Users of the Platform and to collect statistical information about visitors to the Platform, including but not limited to IP addresses, geographical location, how Users' arrived at the Platform and information about the device being used to access the Platform such as the browser, operating system and/or



mobile device type. We would collect this information in order to improve our Platform, direct the most appropriate content to Users and remember a User's preferences for next time they access the Platform.

Please note that Users are able to opt out of cookie technology through changing the settings on their browser, but this may affect the way Users experience our Platform.

#### **14. Will we transfer Personal Information to anybody?**

If we change our business structure (for example by incorporating, or by bringing on board new partners), then, in our sole discretion, we may transfer, sell, license or assign Personal Information collected to one or more relevant third parties. This may make Users' Personal Information subject to a different privacy policy and if that is the case, we will post notice of this on the Platform.

#### **15. Who can I contact with questions and complaints regarding this Privacy Policy?**

If you have any questions or if you think something is not quite right, please contact us at any time by emailing [support@ifactfind.com.au](mailto:support@ifactfind.com.au)

#### **16. Further information**

For further information on online privacy rights, please contact the Office of the Australian Information Commissioner:

Online: [www.oaic.gov.au/privacy](http://www.oaic.gov.au/privacy)

Phone: 1300 363 992

Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

## HOW TO CONTACT US

If you have any questions in relation to Privacy Policy, you can contact us in the following ways:

Email: [support@ifactfind.com.au](mailto:support@ifactfind.com.au)

Phone: 1300 0 PULSS (1300 0 78577)

Postal Address: PO Box 560, Carlton North, Victoria Australia 3054

These Terms were last modified on 01 July 2022 and are effective from that date.