

PRIVACY POLICY - Australia

Rinstrum Pty Ltd understands how important the privacy of your personal information is to you and is committed to protecting your privacy. Rinstrum Pty Ltd is bound by and complies with the provisions of the *Privacy Act 1988 (Commonwealth)* and the National Privacy Principles contained in the *Privacy Amendment (Private Sector) Act 2000 (Commonwealth)*.

This statement discloses the practices by which Rinstrum Pty Ltd intends to protect the quality and integrity of your personal information and provides guidelines as to how we shall deal with your personal information.

Why do we collect information?

Rinstrum Pty Ltd will only collect personal information that is necessary for providing services to our customers and which is necessary for the operation of our business. We collect information to ensure the proper and efficient management of our business customers and/or our customer's account.

When personal information is sought, it will be treated in strict confidence and will not be disclosed.

How we collect information?

We collect necessary information from our customers from the Application form that is completed when you open an account with Rinstrum Pty Ltd or become one of our customers. Any additional information that we require will be collected through a direct request to you. In some circumstances we may be provided with this information by your advisors or agents.

We will only collect, maintain and use your personal information when necessary for us to ensure the proper and efficient management of your account or the running of our business.

How we might use your information?

We will not disclose or use your personal information for any other purpose other than:-

Where you have consented to the use; or

For the purpose for which it was provided. Should we use the information for secondary purposes your express consent will be first obtained unless the secondary purpose has been notified to you at the time of the collection or the secondary purpose is allowed under the National Privacy Principles; or

Where the National Privacy Principles authorise disclosure or where authorised under law; or

We may use your personal information for the purpose of providing you with information relating to our products. Should you not wish to receive additional information relating to our products there will be an option attached to the product message giving you the option to opt out from receiving this further additional information.

Who will we disclose your information to?

- Regulatory authorities as required under law and company auditors.
- Anyone else to whom you authorise us to disclose it.

Security of your personal information

Reasonable steps will be taken to ensure that personal information which is collected, used and disclosed is relevant, accurate, complete and up to date for the purpose for which it is to be used.

We will seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure. Furthermore, we will take reasonable steps to ensure all information that Rinstrum Pty Ltd no longer requires will be

destroyed or permanently de-identified to ensure continued protection of your personal information.

At all times your information is treated as confidential and any sensitive information is treated as highly confidential. We do not provide our data base to other sources or marketing agencies.

Should you wish to update or change any of your personal information would you please send your request to accounts@rinstrum.com

Should you wish to know what information we hold, for what purpose and how we collect, hold, use and disclose that information please send your request in writing, for security reasons to us. We note that there are occasions when access to the information may be denied under exemptions contained in the Privacy Act 1988.

Do we use Cookies?

Our website uses "Cookies". The use of Cookies is an industry standard and you will find that most major websites use them. A Cookie is a small text file that our website may place on your computer when you access our website. It leaves an identification code on your computer (just a random number) to recognise your computer and remember your entries as you move from page to page or even when you revisit the site from time to time using the same computer. All data provided remains securely on the server and only an identification code is stored on your computer. The information on the server is temporary and is deleted 20 minutes after the user leaves the website.

Cookies are designed improve your experience of our website. On there own Cookies do not usually collect personal information. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to deny or accept the Cookie feature or to warn you when Cookies are being used. Please note that if you disable Cookies, you may not be able to access certain areas of our website or take advantage of the improved website experience that Cookies offer. You should note that Cookies may be necessary to provide you with features such as merchandise transactions or registered services.

National Privacy Principles

You can obtain a copy of the National Privacy Principles at the Privacy Commissioners website at www.privacy.gov.au .

Privacy Legislation

You can obtain copies of the *Privacy Act 1988 (Commonwealth)* and the Privacy Amendment (Private Sector) Act 2000 at the Australian Legal Information Institute (AUSTLII) website at www.austlii.edu.au.

PRIVACY POLICY – EUROPE

Security and protection of your personal data

We consider it our primary responsibility to protect the confidentiality of the personal information you provide and to protect it from unauthorized access. That's why we use the utmost care and state-of-the-art security standards to ensure maximum protection of your personal information. As a private company, we are subject to the provisions of the European General Data Protection Regulation (GDPR). We have taken technical and organizational measures to ensure that the data protection rules are respected both by us and by our external service providers.

Definitions

Legislation requires that personal data be processed lawfully, in good faith and in a manner that is reasonable for the data subject ("lawfulness, fairness, transparency"). To ensure this, we inform you about the individual legal definitions that are also used in this privacy statement:

Personal data

"Personal data" means any information relating to an identified or identifiable natural person (hereinafter the "data subject"); a natural person is regarded as identifiable, which can be identified directly or indirectly, in particular by association with an identifier such as a name, an identification number, location data, an online identifier or one or more special features, the expression of the physical, physiological, genetic, mental, economic, cultural or social identity of this natural person.

Processing

"Processing" means anyone, with or without the help of automated procedures, performed procedures or any such series of operations related to personal data such as collection, collection, organization, ordering, storage, adaptation or modification, reading, querying, the use, disclosure by transmission, dissemination or any other form of provision, matching or linking, restriction, erasure or destruction.

Restriction of processing

"Restriction of processing" is the marking of personal data stored with the aim of limiting its future processing.

Profiling

"Profiling" means any kind of automated processing of personal data which consists in using that personal data to evaluate certain personal aspects relating to a natural person, in particular aspects relating to job performance, economic situation, health, to analyse or predict personal preferences, interests, reliability, behaviour, location or change of location of that natural person.

Pseudonymization

"Pseudonymisation" means the processing of personal data in such a way that the personal data can no longer be assigned to a specific data subject without additional information being provided, provided that such additional information is kept separate and subject to technical and organizational measures to ensure that the personal data cannot be assigned to an identified or identifiable natural person.

File system

"File system" means any structured collection of personal data accessible by specific criteria, whether that collection is centralized, decentralized or organized according to functional or geographical considerations.

Responsible Person

"Responsible person" means a natural or legal person, public authority, body or body that alone or jointly with others decides on the purposes and means of processing personal data; where the purposes and means of such processing are determined by Union law or the law of the Member States, the controller or the specific criteria for his appointment may be provided for under Union or national law.

Processors

"Processor" means a natural or legal person, public authority, body or body that processes personal data on behalf of the controller.

Receiver

"Recipient" means a natural or legal person, public authority, agency or other entity to whom personal data are disclosed, whether or not it is a third party. However, authorities which may receive personal data under Union or national law in connection with a particular mission are not considered to be recipients; the processing of such data by the said authorities shall be in accordance with the applicable data protection rules in accordance with the purposes of the processing.

Third

"Third party" means a natural or legal person, public authority, body or body other than the data subject, the controller, the processor and the persons authorized under the direct responsibility of the controller or processor to process the personal data.

Consent

A "consent" of the data subject is any expression of will voluntarily given in a specific, unequivocal and unambiguous manner in the form of a statement or other unambiguous confirmatory act that indicates to the data subject that they are involved in the processing of the data subject personal data.

Legality of processing

The processing of personal data is only lawful if there is a legal basis for processing. The legal basis for the processing may, in accordance with Art. 6 (1) sentence a-f GDPR in particular:

The data subject has given his consent to the processing of the personal data concerning him for one or more specific purposes;

- the processing is necessary for the performance of a contract to which the data subject is a party or for the performance of pre-contractual measures which are carried out at the request of the data subject;
- the processing is necessary to fulfill a legal obligation to which the controller is subject;
- the processing is necessary to protect the vital interests of the data subject or any other natural person;
- the processing is necessary for the performance of a task which is in the public interest or in the exercise of public authority delegated to the controller;
- processing is necessary to safeguard the legitimate interests of the controller or a third party, unless the interests or fundamental rights and freedoms of the data subject requiring personal data protection prevail, in particular where the data subject is a child.

Information about the collection of personal data

In the following we inform about the collection of personal data when using our website. Personal data is z. Name, address, e-mail addresses, user behaviour.

When contacting us by e-mail or using a contact form, the information you provide (your e-mail address, your name and your telephone number, if applicable) will be stored by us to answer your questions. We delete the data in this connection after the storage is no longer required, or the processing is restricted, if legal storage obligations exist.

Collection of personal data when visiting our website

In the case of merely informative use of the website, ie if you do not register or otherwise provide us with information, we only collect the personal data that your browser transmits to our server. If you wish to view our website, we collect the following data which is technically necessary for us to inform you about our website and to ensure its stability and security (legal basis is Art. 6 (1) sentence 1 lit. GDPR):

IP address

Date and time of the request

Time Zone Difference to Greenwich Mean Time (GMT)

Content of the requirement (concrete page)

Access Status / HTTP status code

each transmitted amount of data

Website from which the request comes

browser

Operating system and its interface

Language and version of the browser software

Use of cookies

(1) In addition to the above mentioned data, cookies are stored on your computer when using our website. Cookies are small text files that are stored on your hard drive, assigned to the browser you are using, and that provide certain information to the body that sets the cookie. Cookies cannot run programs or transmit viruses to your computer. They serve to make the Internet offer more user-friendly and effective overall.

(2) This website uses the following types of cookies, the scope and operation of which are explained below:

Transient cookies

Persistent cookies

Transient cookies are automatically deleted when you close the browser. These include in particular the session cookies. These store a so-called session ID, with which various requests from your browser can be assigned to the common session. This will allow your computer to be recognized when you return to our website. The session cookies are deleted when you log out or close the browser.

Persistent cookies are automatically deleted after a specified period, which may differ depending on the cookie. You can delete the cookies in the security settings of your browser at any time.

You can configure your browser setting according to your wishes and

z. B. decline the acceptance of third-party cookies or all cookies. Undertow. "Third Party Cookies" are cookies that have been set by a third party, and therefore not by the actual website on which you are currently located. Please note that disabling cookies may not enable you to use all features of this website.

We use cookies to identify you for follow-up visits if you have an account with us. Otherwise you would have to log in again for each visit.

The Flash cookies used are not detected by your browser but by your Flash plug-in. Furthermore, we use HTML5 storage objects, which are stored on your device. These objects store the required data regardless of your browser and do not have an automatic expiration date. If you do not want to process the Flash cookies, you must install a corresponding add-on, eg. Eg "Better Privacy" for Mozilla Firefox (<https://addons.mozilla.org/en/firefox/addon/betterprivacy/>) or the Adobe Flash killer cookie for Google Chrome. You can prevent the use of HTML5 storage objects by using private mode in your browser. In addition, we recommend that you regularly delete your cookies and the browser history manually.

More features and offers of our website

In addition to the purely informative use of our website, we offer various services that you can use if you are interested. To do this, you will generally need to provide other personal information that we use to provide the service and for which the above mentioned data processing principles apply.

In part, we use to process your data from external service providers. These have been carefully selected and commissioned by us, are bound by our instructions and are regularly inspected.

Furthermore, we can pass on your personal data to third parties, if action participations, competitions, contracts or similar services are offered by us together with partners. For more information, please refer to your personal data or below in the description of the offer.

Insofar as our service providers or partners are based in a country outside the European Economic Area (EEA), we inform you about the consequences of this circumstance in the description of the offer.

Children

Our offer is basically for adults. Persons under the age of 16 should not submit any personal data to us without the consent of their parents or guardians.

Rights of the person concerned

(1) Revocation of consent

If the processing of the personal data is based on a given consent, you have the right to revoke the consent at any time. The revocation of consent does not affect the legality of the processing carried out on the basis of the consent until the revocation.

For the exercise of the right of withdrawal, you can always contact us.

(2) Right to confirmation

You have the right to ask the person in charge to confirm that we are processing personal data concerning you. You can request confirmation at any time using the contact details above.

(3) Right to information

If personal data is processed, you can request information about this personal data and the following information at any time:

- the processing purposes;
- the categories of personal data being processed;
- the recipients or categories of recipients to whom the personal data have been disclosed or are still being disclosed, in particular to recipients in third countries or to international organizations;
- if possible, the planned duration for which the personal data are stored or, if this is not possible, the criteria for determining that duration;
- the existence of a right to rectification or erasure of the personal data concerning you or to a restriction of processing by the controller or a right to object to such processing;
- the existence of a right of appeal to a supervisory authority;
- if the personal data are not collected from the data subject, all available information on the source of the data;
- the existence of automated decision-making, including profiling, in accordance with Article 22 (1) and (4) GDPR and, at least in these cases, meaningful information about the logic involved and the scope and intended impact of such processing on the data subject.

If personal data are transmitted to a third country or to an international organization, you have the right to be informed of the appropriate safeguards under Article 46 of the GDPR in connection with the transfer. We provide a copy of the personal data that is the subject of the processing. For any additional copies you request of a person, we may charge a reasonable fee based on the administrative costs. If the application is submitted electronically, the information must be provided in a standard electronic format, unless otherwise stated. The right to receive a copy under paragraph 3 shall not affect the rights and freedoms of others.

(4) Right to rectification

You have the right to demand immediate correction of incorrect personal data concerning you. Taking into account the purposes of processing, you have the right to request the completion of incomplete personal data, including by means of a supplementary statement.

(5) Right to cancellation ("right to be forgotten")

You have the right to request that the person responsible for your personal data be deleted immediately and we are obliged to delete personal data immediately if one of the following applies:

- The personal data are no longer necessary for the purposes for which they were collected or otherwise processed.
- The data subject withdraws the consent on which the processing was based, in accordance with Article 6 (1) (a) or Article 9 (2) (a) GDPR, and lacks any other legal basis for the processing.
- In accordance with Article 21 (1) of the GDPR, the data subject objects to the processing and there are no legitimate grounds for processing, or the data subject objects to the processing in accordance with Article 21 (2) GDPR. The personal data were processed unlawfully.

The erasure of personal data is necessary to fulfill a legal obligation under Union or national law to which the controller is subject.

The personal data were collected in relation to information society services offered pursuant to Article 8 (1) of the GDPR.

If the controller has made the personal data publicly available and is required to erase it in accordance with paragraph 1, taking into account the technology available and the implementation costs, he shall take appropriate measures, including technical ones, to inform data controllers who process the personal data to inform that an affected person has requested that they delete all links to such personal data or copies or replications of such personal data.

The right to cancel ("right to be forgotten") does not exist if the processing is required:

- to exercise the right to freedom of expression and information;
- to fulfill a legal obligation required by the law of the Union or of the Member States to which the controller is subject, or to carry out a task of public interest or in the exercise of official authority conferred on the controller;
- for reasons of public interest in the field of public health pursuant to Article 9 (2) (h) and (i) and Article 9 (3) GDPR;
- for archival purposes of public interest, for scientific or historical research purposes or for statistical purposes pursuant to Article 89 (1) GDPR, to the extent that the law referred to in paragraph 1 is likely to render impossible or seriously prejudice the achievement of the objectives of that processing, or
- to assert, exercise or defend legal claims.

(6) Right to restriction of processing

You have the right to request that we restrict the processing of your personal data if any of the following conditions apply:

- the accuracy of the personal data is disputed by the data subject for a period allowing the controller to verify the accuracy of the personal data;
- the processing is unlawful and the data subject refuses to delete the personal data and instead requests the restriction of the use of the personal data;
- the controller no longer needs the personal data for the purposes of the processing, but the data subject requires them to assert, exercise or defend legal claims; or
- the person concerned has lodged an objection to the processing pursuant to Article 21 (1) of the GDPR, as long as it is not certain that the responsible reasons of the person responsible prevail over those of the person concerned.

If the processing has been restricted in accordance with the above-mentioned conditions, these personal data will only be stored with the consent of the data subject or for the purpose of

asserting, exercising or defending legal claims or protecting the rights of another natural or legal person or for reasons important public interest of the Union or of a Member State.

In order to exercise the right to limit processing, the data subject may contact us at any time using the contact details provided above.

(7) Right to data portability

You have the right to receive the Personal Data You provide to us in a structured, common and machine-readable format, and you have the right to transfer that information to another person without hindrance by the controller providing the Personal Information were to be transmitted, provided that:

- the processing is based on a consent in accordance with Article 6 (1) (a) or Article 9 (2) (a) or a contract pursuant to Article 6 (1) (b) GDPR; and the processing is done using automated procedures.

When exercising the right to data portability in accordance with paragraph 1, you have the right to obtain that the personal data are transmitted directly from one controller to another, as far as technically feasible. The exercise of the right to data portability is without prejudice to the right of cancellation (the right to be forgotten). This right does not apply to processing necessary for the performance of a task in the public interest or in the exercise of official authority delegated to the controller.

(8) Right to object

You have the right, for reasons of your own particular situation, to object at any time to the processing of personal data relating to you pursuant to Article 6 (1) (e) or (f) of the GDPR; this also applies to profiling based on these provisions. The controller no longer processes the personal data unless he can demonstrate compelling legitimate grounds for processing that outweigh the interests, rights and freedoms of the data subject, or the processing is for the purpose of enforcing, pursuing or defending legal claims.

If personal data is processed in order to operate direct mail, you have the right to object at any time to the processing of personal data concerning you for the purpose of such advertising; this also applies to profiling insofar as it is associated with such direct mail. If you object to the processing for direct marketing purposes, the personal data will no longer be processed for these purposes.

Regarding the use of information society services, regardless of Directive 2002/58 / EC, you can exercise your right to object through automated procedures that use technical specifications.

You have the right, for reasons of your own particular situation, to object to the processing of personal data concerning you for scientific or historical research purposes or for statistical purposes under Article 89 (1), except when: the processing is necessary to fulfill a public interest task.

The right of objection can be exercised at any time by contacting the respective person responsible.

(9) Automated decisions on a case-by-case basis, including profiling

You have the right not to be subjected to a decision based solely on automated processing - including profiling - that will have legal effect or similarly affect you in a similar manner. This does not apply if the decision:

necessary for the conclusion or performance of a contract between the data subject and the controller, is permitted by Union or Member State legislation to which the controller is subject, and where such legislation contains appropriate measures to safeguard the rights, freedoms and legitimate interests of the data subject, or with the express consent of the data subject.

The controller shall take reasonable steps to safeguard the rights and freedoms and legitimate interests of the data subject, including at least the right to obtain the intervention of a person by the controller, to express his or her own position and to challenge the decision.

This right can be exercised by the data subject at any time by addressing himself to the responsible person.

(10) Right to complain to a supervisory authority

Furthermore, without prejudice to any other administrative or judicial remedy, they shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of their residence, place of work or place of alleged infringement, if the data subject considers that the processing concerns their personal data breaches this Regulation.

(11) Right to effective judicial remedy

Without prejudice to an available administrative or extrajudicial remedy, including the right to complain to a supervisory authority under Article 77 of the GDPR, it shall have the right to an effective judicial remedy if it considers that the rights conferred on it by that Regulation are not satisfied by that Regulation concerning the processing of their personal data.

General Data Protection Regulation

You can obtain copies of the GDPR at the EU-website in several languages at <http://eur-lex.europa.eu/eli/reg/2016/679/oj>