

Privacy Policy

1. WE RESPECT YOUR PRIVACY

Hamelin Gold Limited and its Related Bodies Corporate (as defined by the provisions of the *Corporations Act 2001* (Cth)) (“**Hamelin Gold**”, **we**, **us** or **our**) respects your right to privacy and is committed to safeguarding the privacy of our customers and website visitors. This policy sets out how we collect and treat your personal information.

We adhere to the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth) (“Privacy Act”) and to the extent applicable. The Privacy Act defines “Personal information” to mean any information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- (a) whether the information or opinion is true or not; and
- (b) whether the information or opinion is recorded in a material form or not.

If you have any concerns or complaints about the manner in which your Personal Information has been collected, used or disclosed by us, please contact us via the information set out in **Section Error! Reference source not found.** and will resolve your concern or answer your question.

2. WHAT PERSONAL INFORMATION IS COLLECTED

We will only use or disclose your Personal Information for the primary purposes for which it was collected or as consented to by you. Hamelin Gold will receive and store personal information you submit to our website, provided to us directly or given to us in other forms when you visit our website, engage with our promotions or apply for our services.

We set out some common collection, use and disclosure instances in the table below.

We do not knowingly collect information from children under the age of 18.

In this case of sensitive information – such as information about your racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association or trade union, sexual preferences or practices, criminal record, health or genetic information – we will not collect, use or disclose any sensitive information about you unless we have your specific consent, and it is necessary to undertake one of the functions referred to below.

Collection event	Type of personal information collected	Manner of collection	Purposes for collection	Intended use of personal information collected	Consequences if personal information not collected
Online enquiries	<p><i>Contact Information such as your:</i> Name, email address, current postal and residential addresses, phone numbers, country of residence. Any other personal information you volunteer in the body of your enquiry</p>	Collected via website/email and from you directly in writing or via phone.	To investigate and address customer enquiries.	<p>Address customer enquiry. Sign up to mailing list. De-identified and/or aggregated use in internal analytics. Use in connection with any sale or any part of Hamelin Gold's business or a company within the Hamelin Gold group of entities, or any investment in or by Hamelin Gold. Use for quality assurance purposes.</p>	<p>May be unable to respond to, or investigate, your enquiry. We may be unable to sign you up to our mailing list.</p>
New shareholders	<p><i>Contact Information such as your:</i> Name, email address, current postal and residential addresses, phone numbers, country of residence. Your shareholder ID (HIN, etc)</p>	Collected via you directly or Automatic Group.	To facilitate your purchase of shares in our company.	<p>Administration of your shareholding in Hamelin Gold. Reporting to regulatory bodies, e.g. ASX. Organising and managing general meetings. Use in connection with any sale or any part of Hamelin Gold's business or a company within the Hamelin Gold group of entities, or any investment in or by Hamelin Gold.</p>	We will be unable to facilitate your acquisition of shares or some other interest in Hamelin Gold.

Collection event	Type of personal information collected	Manner of collection	Purposes for collection	Intended use of personal information collected	Consequences if personal information not collected
Credit application / new account	<p><i>Where you deal with us as a company applicant:</i> Director address, email address, name, title and gender Director driver's licence Director's date of birth</p> <p><i>Where you deal with us as an individual applicant:</i> Email address, name, title, gender and phone number Driver's licence and date of birth Business name and ABN Business address and contact details Basic trading information including turnover and monthly receipts Your bank account details Your credit rating, risk class, risk forecast, credit limit, legal form, share capital, domicile, places of business, calculated annual revenue, date of registration, board of directors, summary of annual accounts and key ratio, record of non-payment</p>	<p>From you or as you have nominated via direct input into our origination form.</p> <p>Our credit providers, credit reporting bodies, and third party service providers who assist us with running credit checks in respect of your financial standing, e.g. your nominated bank.</p> <p>Marketing companies from which we may acquire information so we may offer services to you.</p> <p>Business partners or third parties who have your consent to pass information relating to your creditworthiness on to us or who may be authorised by you to authenticate or identify you to us. This may include obtaining information about you from third party verification services and credit reference agencies.</p>	<p>To facilitate the extending of credit to you.</p>	<p>To make an assessment of your financial standing and creditworthiness.</p> <p>To facilitate your application to become a customer of Hamelin Gold and receive credit from us.</p> <p>To manage your account with us for the term of your credit.</p> <p>To ensure compliance with appropriate regulatory bodies applicable to our extension of credit to you.</p> <p>De-identified and/or aggregated use in internal analytics.</p> <p>Use in connection with any sale or any part of Hamelin Gold's business or a company within the Hamelin Gold group of entities, or any investment in or by Hamelin Gold.</p>	<p>We may be unable to assess your application and your application may be rejected.</p> <p>Where you are an existing customer with us and apply for a draw down or to extend your credit with us, if we are not able to ensure your credit information is up-to-date we will be unable to reconsider any adjusted or increased facility.</p>

Collection event	Type of personal information collected	Manner of collection	Purposes for collection	Intended use of personal information collected	Consequences if personal information not collected
	and debt with enforcement services			<p>Use for quality assurance purposes.</p> <p>To assist in the resolution of any dispute you have with us.</p> <p>To provide you with information about other products or services we currently offer, or may offer in the future or are offered by our commercial partners.</p> <p>To satisfy any obligation we may have under the law to collect personal information or make assessments.</p>	
Marketing activities	<p><i>Contact Information such as your:</i></p> <p>Name, email address, current postal and residential addresses, phone numbers, country of residence. Your browsing history with respect to use on our applications and websites, including: information on your location, weblogs and other communication, information on our Website and Application resources</p>	<p>Online forms you provide to us.</p> <p>Via our service providers who collect your browsing history.</p> <p>Marketing companies from which we may acquire information in order that we may offer services to you.</p>	To understand customer intention, stage of purchase journey and provide appropriate support.	<p>To support interested customers in applying for credit with Hamelin Gold.</p> <p>Use in de-identified and/or aggregated form for internal analytical purposes.</p> <p>To subscribe you to our mailing list.</p>	We will not be able to have your participation in our marketing activities.

Collection event	Type of personal information collected	Manner of collection	Purposes for collection	Intended use of personal information collected	Consequences if personal information not collected
	<p>accessed by you, your IP address or other unique identifiers for computers, mobile devices, technology or other devices used to access our Websites or Application, information on your browser type and operating system, and the date, time and duration of your Website or Application access.</p>				
<p>Human resources</p>	<p><i>Contact Information such as your:</i> Name, email address, current postal and residential addresses, phone numbers, country of residence. Bank details Your country of residence Your next of kin contact details Your past employee record information Identifying information, such as your photo, passport, driver's licence and date of birth Any personal information contained on your CV</p>	<p>New employee onboarding forms. Collection during pre-employment screening, such as interviews.</p>	<p>To process your application for employment or engagement by us. To enable ongoing employee management and enable payment.</p>	<p>To screen your eligibility for employment. Where appropriate, to conduct background checks, including via social media. Verification of your identity and age. Administration of our business, including industrial relations matters. Use in connection with any sale or any part of Hamelin Gold's business or a company within the Hamelin Gold group of entities, or any</p>	<p>We may be unable to process your application, or unable to pay you in the manner requested.</p>

Collection event	Type of personal information collected	Manner of collection	Purposes for collection	Intended use of personal information collected	Consequences if personal information not collected
	Tax, superannuation and payroll information Background check information Personal information collected from referees			investment in or by Hamelin Gold.	

3. HOW WE USE YOUR PERSONAL INFORMATION

Hamelin Gold will use personal information only for the purposes for which it was collected, or otherwise as consented by you or authorised by law. This may include to:

- provide our products and services to you, including verifying and authenticating your account and identity, processing your payments and payment system or card details in order to complete transactions made through the Website or Application with us or our business partners or obtaining further verification information about you from third party credit reference agencies and verification services and to perform credit checks against you;
- provide you with products and services during the usual course of our business activities;
- administer our business activities;
- manage, research and develop our products and services;
- provide you with information about our products and services;
- communicate with you by a variety of measures including, but not limited to, by telephone, email, sms or mail; and
- investigate any complaints.

If you withhold your personal information, it may not be possible for us to provide you with our products and services or for you to fully access our website.

We may disclose your personal information to comply with a legal requirement, such as a law, regulation, court order, subpoena, warrant, legal proceedings or in response to a law enforcement agency request.

If there is a change of control in our business or a sale or transfer of business assets, we may disclose or transfer to the extent permissible at law our user databases, together with any personal information and non-personal information contained in those databases.

4. EXCHANGE OF PERSONAL INFORMATION

In terms of sharing, disclosing or transferring your personal information to third parties (together, "Disclose" or "Disclosing"), we will only Disclose personal information for the purposes for which that personal information is collected, or otherwise as consented by you or authorised by law. In the ordinary course of our business where you interact with us as an actual or prospective customer, we may disclose your personal information to the following entities (and you consent to this disclosure):

- credit reporting bodies, ratings agencies and any business which provide information about the credit worthiness of persons with whom we have a commercial arrangement (more detail about this appears below);
- other credit providers;
- personal and/or business referees nominated by you, including your employer (in relation to your employment status and income);
- our professional advisers, contractors and other service providers (eg. IT consultants);
- your legal and financial advisers (if any) if permitted by you;

- Centrelink, Australian Taxation Office or other Government departments, agencies or bodies, to whom we may be required by law to disclose information supplied by you to us;
- our financiers;
- our contractors, agents and service providers (including debt collectors) in order that we may deal with you more efficiently or collect monies owing to us;
- our ASIC and OAIC approved external dispute resolution service;
- our insurers, insurance underwriters/providers in relation to our insurance policies;
- entities who may purchase (or who may be interested in purchasing) any interest in the obligations you may owe us under the credit contract, and
- entities (either credit licensees (credit providers or credit assistance providers) or lead providers) to whom we may sell your personal information for a fee. The credit licensees or lead providers may either provide a service to you themselves or on-sell your personal information to others on the same basis as your personal information is sold to them.

If you have been referred to us by a third party or partnering organisation, we may disclose your personal information to the third party or partner in order to fulfil our commercial obligations under the referral arrangement.

5. HOSTING AND INTERNATIONAL DATA TRANSFERS

Personal information that we collect may from time to time be stored, processed in or transferred between parties or sites located in countries outside of Australia.

The hosting facilities for our website are situated in Australia.

Our Suppliers and Contractors are situated in Australia.

You acknowledge that personal information that you submit for publication through our websites, Application or other services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal information by others.

6. ACCESS TO YOUR PERSONAL INFORMATION

You may request details of personal information that we hold about you in accordance with the provisions of the Privacy Act. If you would like a copy of the information which we hold about you, please contact us via the contact details provided at the end of this policy.

We will usually be able to provide this information to you within 30 days of the request. Should we require longer, we will write to you advising you a reason and seeking additional time. We may require you to pay our reasonable costs of providing this information to you. There are restrictions in relation to those costs contained in the Privacy Act.

If possible, we will provide you with the personal information in the form you request. However, in some circumstances it may be necessary for you to access that information in a method determined by us, but we will always make it as easy as possible for you to access that information.

There may be occasions where we cannot provide you with that information. In such a case we will write to you and give you our reasons.

7. COMPLAINTS ABOUT PRIVACY

We have put in place an effective mechanism and procedure to resolve privacy complaints. We will ensure that all complaints are dealt with in a reasonably appropriate timeframe so that any decision (if any decision is required to be made) is made expeditiously and in a manner that does not compromise the integrity or quality of any such decision.

If you have any concerns or complaints about the manner in which we have collected, used or disclosed and stored your Personal Information, please contact us:

Telephone: 08 9486 9455
Email: contact@hamelingold.com.au
Address: Suite 2, 1 Alvan Street, Subiaco, WA, 6008

In order to resolve a complaint, we:

- (a) will liaise with you to identify and define the nature and cause of the complaint;
- (b) may request that you provide the details of the complaint in writing;
- (c) will keep you informed of the likely time within which we will respond to your complaint; and
- (d) will inform you of the legislative basis (if any) of our decision in resolving such complaint.

If you are not satisfied with the resolution of the complaint, you have a right to refer the complaint to our external dispute resolution service at:

Office of the Australian information Commissioner (**OAIC**)

Phone: 1300 363 992

Address: GPO Box 5218, Sydney NSW 2001

Email: enquiries@oaic.gov.au

Website: www.oaic.gov.au

Complaint form available '[here](#)'

8. CORRECTION TO PERSONAL INFORMATION

You can request that any personal information we hold be corrected if it is inaccurate, incomplete or out of date. If you wish to make such a request you should contact us by any of the methods set out above.

If your request relates to information that we have received from a credit reporting body, we will contact the credit reporting body and advise them of your request.

If we agree with you that your information is inaccurate, incomplete or out of date we will make the appropriate changes and will write to you and tell you the changes we have made within seven days of making that change.

If we do not agree that the information is inaccurate, incomplete or out of date, we will write to you giving you the reasons why we have formed the opinion and tell you what steps you can take as a result of our refusal to change the information.

9. CHANGES TO PRIVACY POLICY

Please be aware that we may change this Privacy Policy in the future. We may modify this Policy at any time, at our sole discretion and all modifications will be effective immediately upon our posting of the modifications on our website or notice board. Please check back from time to time to review our Privacy Policy.

10. WEBSITE AND MOBILE APPLICATION

When you come to our website (www.hamelingold.com.au) or mobile application, we may collect certain information such as browser type, operating system, website visited immediately before coming to our site, etc. This information is used in an aggregated manner to analyse how people use our site, such that we can improve our service.

We may from time to time use cookies on our website. Cookies are very small files which a website uses to identify you when you come back to the site and to store details about your use of the site. Cookies are not malicious programs that access or damage your computer. Most web browsers automatically accept cookies but you can choose to reject cookies by changing your browser settings. However, this may prevent you from taking full advantage of our website. Our website may from time to time use cookies to analyse website traffic and help us provide a better website visitor experience. In addition, cookies may be used to serve relevant ads to website visitors through third party services such as Google AdWords. These ads may appear on this website or other websites you visit. More detail can be found in our Cookie Policy below.

Our site may from time to time have links to other websites not owned or controlled by us. These links are meant for your convenience only. Links to third party websites do not constitute sponsorship or endorsement or approval of these websites. Please be aware that Hamelin Gold Limited is not responsible for the privacy practices of other such websites. We encourage our users to be aware, when they leave our website, to read the privacy statements of each and every website that collects personal identifiable information.

11. COOKIE POLICY

This Website and app (referred to in these “terms of use” as the website) is owned and operated by Hamelin Gold Limited and its related entities and related bodies corporate, who is referred to in this Cookie Policy as “we”, “us”, “our” and similar grammatical forms.

General information about visits to our Websites and apps is collected by our computer servers, with small files “cookies” that our Websites transfers to your computer’s hard drive through your Web browser (if you allow the delivery of “cookies”). The “cookies” are used to follow the pattern of movements of users by letting us know which pages on our Websites are visited, in what order and how often and the previous website visited and also to process the items you select if you are making purchases from our Websites. The anonymous non-personal information that we collect and analyse is not personal information as described in the Privacy Act.

WHY DO WE USE “COOKIES” AND OTHER WEB USE TRACKING TECHNOLOGIES?

When you access our Website and apps, small files containing a unique identification (ID) number may be downloaded by your web browser and stored in the cache of your computer. The purpose of sending these files with a unique ID number is so that our Website can recognise your computer when you next visit our Website. The “cookies” that are shared with your computer can’t be used to discover any personal information such as your name, address or email address they merely identify your computer to our Websites when you visit us.

We can also log the internet protocol address (IP address) of visitors to our Website so that we can work out the countries in which the computers are located.

We collect information using “cookies” and other tracking technologies for the following reasons:

- to help us monitor the performance of our Website so that we can improve the operation of the Website and the services we offer;
- to provide personalised services to each user of our Website to make their navigation through our Website easier and more rewarding to the user;
- to sell advertising on the Website in order to meet some of the costs of operating the Website and improve the content on the Website; and
- when we have permission from the user, to market the services we provide by sending emails that are personalised to what we understand are the interests of the user.

Even if you have given us permission to send you emails, you can, at any time, decide not to receive further emails and will be able to “unsubscribe” from that service.

In addition to our own cookies, we may also use various third-parties’ cookies to report usage statistics of the Website, deliver advertisements on and through the Website, and so on.

WHAT ARE YOUR CHOICES REGARDING COOKIES?

If you are unhappy about having a cookie sent to you, you can set your browser to refuse cookies or choose to have your computer warn you each time a cookie is being sent. However, if you turn your cookies off, some of our services may not function properly.

12. CONTACT US

Address – Suite 2, 1 Alvan Street, Subiaco, WA, 6008

Email – contact@hamelingold.com.au

Phone – 08 9486 9455

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