

PRIVACY POLICY

Jalandoni Money Changer Pty Ltd (“Jalandoni and Company”)

1. We respect your privacy

- 1.1. Jalandoni and Company respects your right to privacy and is committed to safeguarding the privacy of our customers and website visitors. We adhere to the Australian Privacy Principles (“**APP**”) established by the *Privacy Act 1988* (Cth) (the “**Act**”).
- 1.2. This policy sets out how we collect and treat your personal information and applies whenever you deal with Jalandoni and Company, visit our website, or in any other instance where you provide us with any personal information. It also provides general information about your privacy rights when your personal information is obtained from you or with your consent, through a third party or entity.
- 1.3. “Personal information” means information or an opinion about an identified individual, or an individual who is reasonably identifiable: whether the information or opinion is true or not; and whether the information or opinion is recorded in a material form or not.
- 1.4. A copy of this policy is made available to you free of charge through our website. Please check this regularly as this policy may be updated from time to time.

2. Collection of personal information

- 2.1. Jalandoni and Company will, from time to time, receive and store personal information you enter onto our website, provide to us directly or give to us in other forms.
- 2.2. You may provide basic information such as your name, phone number, address and email address to enable us to send information, provide updates and process your product or service order. We may collect additional information at other times, including but not limited to, when you provide feedback, when you provide information about your personal or business affairs, change your content or email preference, respond to surveys and/or promotions, provide financial or credit card information, or communicate with our customer support.
- 2.3. Additionally, we may also collect any other information you provide while interacting with us. When you apply, enquire or obtain one of our products or services, you consent to us collecting, maintaining, using and disclosing personal information about you and provided by you or by another person.
- 2.4. In any interactions with us, you are not required to give all of the information we request from you. However, without that information, we may be prevented from offering products or services to you pursuant to the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* or other regulations, legislation or risk management policy.

3. How we collect your personal information

- 3.1. Jalandoni and Company collects personal information from you in a variety of ways, including when you interact with us electronically or in person, when you

access our website and when we provide our services to you. We may receive personal information from third parties. If we do, we will manage it as set out in this policy.

- 3.2. We may collect personal information about you from others, such as credit service providers, agents, advisers, brokers, or employers. We may also collect personal information about you that is publicly available, for example from public registers or social media, or made available by third parties.
- 3.3. We will only collect information without your consent when that collection is required or authorised by law. We will not collect government identifiers (such as Tax File Numbers) unless we are required to do so or the law permits us to do so.

4. Anonymity and Pseudonymity

- 4.1. The Act provides you with an option of dealing anonymously or pseudonymously where lawful and practicable. However, due to the type of product and services we offer, we are generally required by law to collect personal information from you prior to offering you a product or service. It is therefore our general policy that we will not deal with you anonymously or allow you to use a pseudonym.

5. Use of your personal information

- 5.1. Jalandoni and Company may use personal information collected from you to provide you with information, updates and our services. We may also make you aware of new and additional products, services and opportunities available to you. We may use your personal information to improve our products and services and better understand your needs.
- 5.2. Jalandoni and Company may contact you by a variety of measures including, but not limited to telephone, email, sms or mail. Specific information about how we use your personal information may be disclosed in other documents provided to you.

6. Disclosure of your personal information

- 6.1. We may disclose your personal information to any of our employees, officers, insurers, professional advisers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this policy. Personal information is only supplied to a third party when it is required for the delivery of our services.
- 6.2. We may from time to time need to disclose personal information to comply with a legal requirement, such as a law, regulation, court order, subpoena, warrant, in the course of a legal proceeding or in response to a law enforcement agency request.
- 6.3. We may also use your personal information to protect the copyright, trademarks, legal rights, property or safety of Jalandoni and Company, www.jalandoniandcompany.com, its customers or third parties.

- 6.4. If you are under 16 years of age or have special needs, we may share your information with your parent, legal guardian or any person appointed to manage your affairs.
- 6.5. By providing us with personal information, you consent to the terms of this policy and the types of disclosure covered by this policy. Where we disclose your personal information to third parties, we will request that the third party follow this policy regarding handling your personal information.

7. Direct Marketing

- 7.1. Jalandoni and Company does not engage in direct marketing. However, if we decide to carry out direct marketing in the future, your information may be used for this purpose. Any direct marketing communications you receive will have an 'unsubscribe' function or you may contact us directly to withhold consent to your personal information being used for marketing purposes.

8. Dealing with unsolicited personal information

- 8.1. In the event that we receive personal information which we did not solicit, such information will be assessed to determine whether we could have collected that information through our dealings with you or through the consents you have provided us. If we reasonably determine that we could not have collected that personal information, we will immediately destroy or de-identify that personal information if lawful to do so.

9. Sensitive Information

- 9.1. The Act also protects your sensitive information. We do not actively seek to collect sensitive information, unless it is necessary for our business purposes or required by law. If we need to obtain this type of information, we will ask for your consent, except where otherwise permitted by law.
- 9.2. "Sensitive information" means: information or an opinion about an individual's: racial or ethnic origin; political opinion; membership of a political association; or religious beliefs or affiliations; philosophical beliefs; membership of a professional or trade association; membership of a trade union; sexual preference or practice; criminal record; that is also personal information; health information about an individual; or genetic information about an individual that is not otherwise health information.

10. Overseas Disclosure

- 10.1. Information that we collect may from time to time be stored, processed in or transferred between parties located in countries outside of Australia. These may include, but are not limited to Philippines. If there is a change of control in our business or a sale or transfer of business assets, we reserve the right to transfer to the extent permissible at law our user databases, together with any personal information and non-personal information contained in those databases. This information may be disclosed to a potential purchaser under an agreement to maintain confidentiality. We would seek to only disclose information in good faith and where required by any of the above circumstances.

- 10.2. For any personal information transmitted overseas or disclosed to an entity which is controlled overseas, we make sure that appropriate data handling and security arrangements are in place. Please note that Australian law may not apply to some of these entities and personal information may be required to be disclosed pursuant to foreign law – to this end, we are not responsible for that disclosure.
- 10.3. Your personal information may be stored in cloud or other types of electronic storage which may be accessible from overseas via an internet connection. If your personal information is accessed electronically from overseas, we are not responsible for that disclosure.

11. Security of your personal information

- 11.1. Jalandoni and Company is committed to ensuring that the information you provide to us is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.
- 11.2. We will take all reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for the purposes of providing our services to you and where we are not required to retain that information by law.
- 11.3. The transmission and exchange of information is carried out at your own risk. We cannot guarantee the security of any information that you transmit to us, or receive from us. Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that personal information that we collect will not be disclosed in a manner that is inconsistent with this policy.

12. Access to your personal information

- 12.1. You may request details of personal information that we hold about you in accordance with the provisions of the Act. A small administrative fee may be payable for the provision of information. If you would like a copy of the information which we hold about you or believe that any information we hold on you is inaccurate, out of date, incomplete, irrelevant or misleading, please email us at AntonioJalandoni@jalandoniandcompany.com.
- 12.2. We reserve the right to refuse to provide you with information that we hold about you, in certain circumstances set out in the Act. If we do not provide the information you have requested, we will advise you of the reason in writing – this may be due to disclosure being unlawful, against public policy or if the information jeopardises the confidentiality of our security or commercial information.

13. Changing or updating your personal information

- 13.1. You should contact us if you wish to change or update your personal information held by us. Prior to making the change, we may ask you to provide us with documentary evidence substantiating the change. In some instances, the change may be due to a mistake by us or a third party. We will advise you once the correction is made or if we cannot correct your information, we will advise you as to the reasons why.

- 13.2. If we do not correct your information within thirty (30) days, we will advise you about the delay, why it has occurred and when we expect for your information to be corrected. We will also seek your written consent to give us more time and advise you that you may wish to lodge a complaint or seek an external dispute resolution provider (or the Office of the Australian Information Commissioner) to address the issue.

14. Complaints about privacy

- 14.1. If you have any complaints about our privacy practices, please feel free to send in details of your complaints to us at 30 Vaucluse Road, Vaucluse Sydney, NSW 2030, Australia. We take complaints very seriously and will respond shortly after receiving written notice of your complaint.

- 14.2. A complaint should identify whether it is about:

- (a) the collection of personal information;
- (b) the use of personal information;
- (c) the disclosure of personal information;
- (d) the security or storage of personal information;
- (e) the accuracy of personal information;
- (f) a refusal to give complaint access to or find out about their personal information; or
- (g) a refusal to change or delete personal information .

- 14.3. If we do not resolve your dispute within thirty (30) days, we will advise you why and when we expect for your information to be corrected. We will also seek your written consent to give us more time and advise you that you may wish to lodge a complaint or seek an external dispute resolution provider (or the Office of the Australian Information Commissioner) to address the issue.

- 14.4. You have twelve (12) months from the date you become aware of your privacy issue or dispute to lodge a complaint with the Office of the Australian Information Commissioner. Their contact details are as follows:

Office of the Australian Information Commissioner

GPO Box 2999, Canberra ACT 2601

Telephone: 1300 363 992

Website: www.oaic.gov.au

Email: enquiries@oaic.gov.au

15. Changes to Privacy policy

- 15.1. Please be aware that we may change this policy in the future. We may modify this policy at any time, in 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 policy.

16. Website

16.1. When you visit our website

When you come on to our website (www.jalandoniandcompany.com) 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.

16.2. Cookies

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.

16.3. 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.

16.4. Third party sites

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 Jalandoni 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.

08 Oct 2014