

VGW Website Privacy Policy

At VGW, we are committed to protecting and respecting your privacy and maintaining your confidence and trust. This privacy policy (“Privacy Policy”) explains how your personal information is collected, why it is collected and how it is kept secure by VGW.

Table of Contents

- 1. DATA CONTROLLER 1
- 2. TYPE OF INFORMATION WE COLLECT 2
- 3. HOW WE COLLECT YOUR INFORMATION 2
- 4. PERSONAL INFORMATION COLLECTED VIA TECHNOLOGY..... 3
- 5. HOW WE USE COLLECTED INFORMATION 4
- 6. YOUR PRIVACY RIGHTS 5
- 7. EXERCISING YOUR PRIVACY RIGHTS 6
- 8. HOW WE PROTECT YOUR INFORMATION 6
- 9. HOW LONG WILL WE RETAIN YOUR INFORMATION 6
- 10. SHARING YOUR INFORMATION 7
- 11. CHANGES TO THIS PRIVACY POLICY 8
- 12. CONTACTING US 8

At VGW, we are committed to protecting and respecting your privacy and maintaining the confidence and trust of our website visitors. This privacy policy ("Privacy Policy") explains how your personal information is collected, why it is collected and how it is kept secure. We are committed to complying with obligations under all applicable global data privacy laws, including the General Data Protection Regulation (‘GDPR’), the California Consumer Privacy Act (‘CCPA’), the Virginia Consumer Data Protection Act (‘VCDPA’), the Canadian Personal Information Protection and Electronic Documents Act (PIPEDA) (and any provincial substantially similar law as applicable) and the Australian Privacy Act 1988 (Cth) (the ‘Privacy Act’) (including the Australian Privacy Principles set out in the Privacy Act (the ‘APPs’)).

This Privacy Policy applies to your use of the website, www.vgw.co (the “Website”), any services or applications provided through the Website and any interaction with VGW Holdings Limited.

1. Data Controller

1.1 This Privacy Policy is issued on behalf of the VGW Group so when we mention "VGW", "we", "us" or "our" in this Privacy Policy, we are referring to the relevant company in the VGW Group responsible for processing your data. VGW Holdings Limited is the ultimate parent company of the VGW Group.

1.2 The data controller responsible for processing data collected through your use of the Website or otherwise any interaction with VGW Holdings Limited is VGW Holdings Limited, having its registered address at Level 11, 15 – 17 William Street, Perth 6000, Western Australia (the “Data Controller”).

2. Type of Information We Collect

2.1 Personal Information is any information about you, whether it is true or not, where your identity is apparent or can reasonably be ascertained from that information. When anonymous information is directly or indirectly associated with personal information, the resulting information is also treated as Personal Information. Anonymous information means information that does not directly or indirectly identify, and cannot reasonably be used to identify, an individual. Aggregate information means information about groups or categories of customers, which does not identify and cannot reasonably be used to identify an individual customer.

2.2 We collect two basic types of information – Personal Information and anonymous information (as defined above at clause 2.1) – and we may use personal and anonymous information to create a third type of information, aggregate information (also defined at clause 2.1). We collect:

- a) contact details, such as your first name and surname, email address, residential address and mobile or other phone numbers;
- b) information sent bilaterally or within a small group using email, post or other methods of communication;
- c) information we obtain from a third party, such as a site or platform provider (including Facebook), about your use of or interest in our services;
- d) location information, including location information provided by a mobile or other device interacting with one of our Websites, or associated with your IP address, where we are permitted by law to process this information; and
- e) activity, technical and device information about your use of our Website, such as the content you view, the time and duration of your visit on our Website, how often you use our services, how you first heard about our Website, your preferences and information about your interaction with the content offered through our Website, your hardware model, device type, other unique device identifiers, operating system version, browser type and IP address.

2.3 Recruitment Privacy Policy

For more information on the type of information we collect through our Recruitment program, please see our [VGW Candidate Privacy Policy](#).

3. How we collect your information

3.1 We collect information in a variety of ways, as set out below.

3.2 **Information you provide to us directly** including when you visit our Website, register on the Website, respond to a survey, fill out a form, and in connection with other activities, services, features or resources we make available on our Website.

3.3 In addition to collecting information via our Website, we may collect information from you by telephone, video or in correspondence (including email, live chat, mail, text message or social media).

3.4 Information you provide when using our services

We also collect information about your use of our products and services through a variety of technologies that are present when you visit our Websites or use our applications on third party sites or platforms (whether or not you are logged in or registered) including cookies, pixels, tags and application programming interfaces (“API”). Please see the section entitled “Personal Data Collected via Technology” below for further information.

Analytics tools are also used by us to collect information, including when you visit our Website or use our applications or services on third party sites or platforms.

3.5 Information we receive from third party service providers

Finally, we also use trusted sources to update or supplement the information you provided, or we have collected, including in order to verify or validate information (for example, postal address, documentation and names).

4. Personal Information Collected via Technology

4.1 When you interact with our Website, we try to make that experience simple and useful. We and our partners use industry standard identifiers, such as cookies or other similar technologies.

4.2 Our Website may use technologies to enhance your experience. These technologies are small files that are placed on your computer, tablet, mobile phone or other devices when you visit a website. They allow us to record certain pieces of information whenever you visit or interact with the website. Usage information may include, in part, browser type, operating system, device type, an estimate of your geographic location associated with your IP address, the location of your mobile device, the page served, the time, referring URLs and other information normally transmitted in HTTP requests. This statistical data provides us with information about your use of the services, such as general engagement with a page, the type of content on that page and how long you stay on that page. Usage information is generally non-identifying but if VGW associates it with you as a specific and identifiable person, VGW will treat it as Personal Information.

4.3 The following are examples of these types of technologies:

- a) **APIs.** APIs work by allowing different types of software to communicate with each other. They make life a lot easier for programmers and provide a better experience for end users.
- b) **Cookies.** These are small text files placed in your device browsers to store your preferences. Most browsers allow you to block and delete cookies. However, if you do that, the service may not work properly.
- c) **Event tagging.** Event tagging (including Facebook App Events) allows us to track actions that occur on the Website such as application installs and purchase events. By tracking these events we can view analytics, measure ad performance, and build audiences for ad targeting.

- d) **Mobile device identifiers.** We may share the advertising identifier associated with your mobile device or tablet (such as the Apple IDFA and Google Advertising ID) with advertisers. It is used to identify your device for internet-based advertising. For instructions for using the advertising choice mechanisms provided by the most popular mobile operating systems, visit the NAI's Mobile Choices [here](#).
- e) **Pixel tags/web beacons.** A pixel tag (also known as a web beacon) is a piece of code embedded on the Website that collects information about your engagement on that web page. The use of a pixel allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement. We may also include web beacons in e-mails to understand whether messages have been opened, acted on or forwarded.

5. How We Use Collected Information

5.1 The Data Controller is responsible for and may use your information for the business purposes described in this Privacy Policy. Other members of the VGW Group may access your information where they act on behalf of the Data Controller as a data processor for the purposes described in this Privacy Policy.

5.2 In accordance with applicable laws and any elections made available to you, VGW may collect and use your information for the following specific purposes:

- a) **To provide and manage the services you request** - This includes, for example, processing your personal details for responding to your queries.
- b) **To improve customer service and our services** - Information you provide helps us respond to your customer service requests more efficiently; we may use feedback you provide to improve our products and services.
- c) **To personalize user experience** - We may use information which has been aggregated to understand how our users as a group use the services and resources provided on our Website.
- d) **To communicate with you** - We may use the information collected to communicate with you, to build and maintain our relationships with you and to process and respond to your requests, enquiries or complaints.
- e) **To send important notices to you** - From time to time, we may send important notices to you, such as communications about purchases you have made, or legal notices regarding the changes to our terms and conditions or other policies. This information is important to your interactions with us and you acknowledge that you may not opt-out of receiving these communications.
- f) **To comply with our legal and regulatory obligations** - We may use information we collect about you to comply with applicable laws and our other regulatory, accounting, taxation, reporting or professional obligations and to protect, exercise or defend our legal rights (including the detection, investigation and prevention of activity that violates our terms and conditions or that may be illegal).

5.3 Automated Decision Making

We do not use automated decision making within the definition of global data protection laws.

5.4 Legal Basis for Collection and Use of Personal Information (GDPR)

With regards to the above purposes, we may collect, use and disclose your information per the following legal basis:

- a) to perform our contractual obligations – such as obtaining professional, financial, technical, administrative or other advice and services in connection with our services;
- b) to comply with applicable GDPR and other EU legal obligations;
- c) for our legitimate interests – such as to investigate breaches of this Privacy Policy, to protect our rights and property (e.g. in the context of a corporate transaction), to enforce our terms and conditions and legal notices, and for the establishment, exercise and defence of legal claims; and
- d) on the basis of your consent – which you may give from time to time (e.g. for the use of certain cookies) with the possibility to withdraw your consent at any time.

5.5 Third Party Service Providers - Behavioural Advertising

We may partner with a third party service provider to either display advertising on our Website or any application accessible via our Website or to manage our advertising on other websites (for example, using custom audiences on Facebook). Our third party service provider may use technologies such as cookies to gather information about your activities on our Website and other websites in order to provide you advertising based on your browsing activities and interests.

5.6 If you wish to opt-out of interest-based advertising, please use one of the following links:

- a) <http://www.aboutads.info/choices/>
- b) <http://youradchoices.ca/choices>
- c) <https://www.youronlinechoices.eu/>

Please note you will continue to receive generic advertisements.

6. Your Privacy Rights

6.1 Marketing Communications

If we process your personal information for the purpose of direct advertising, you have the right to object at any time to this processing; this also applies to profiling, where appropriate, insofar as it is associated with such direct advertising.

6.2 You may opt-out of receiving commercial messages from us by following the instructions contained in those messages. In the event of your objection to processing for the purpose of direct advertising, we will no longer process your personal information for these purposes.

6.3 Cookies

You can change your preferences with regards to cookies and other trackers at any time by clicking on the Your Privacy Choices link at the bottom of our Website.

7. Exercising Your Privacy Rights

7.1 We appreciate that by law and subject to certain conditions, you have a number of rights concerning the personal information we hold about you. These rights include the right to access the personal information we hold about you, the right to object to the processing of your data, the right to update and correct the information we hold about you, and the right to withdraw any consent provided. In some circumstances, you can ask us to delete the personal information we hold about you.

7.2 To exercise the rights described at clause 7.1 please complete the [VGW Access Request Form](#), or alternatively email dataprivacy@vgw.co.

7.3 We will not discriminate against you (e.g. through denying products and services or providing a different level or quality of goods or services) for exercising any of the rights afforded to you.

7.4 If you would like to use an agent authorized in accordance with applicable laws to exercise your rights, we may request evidence that you have provided such agent with a power of attorney or that the agent otherwise has valid written authority to exercise those rights on your behalf.

7.5 Right to Complain to a Supervisory Authority

You also have the right to complain to the relevant data protection supervisory authority about VGW's processing of your personal information. Please complete the [VGW Access Request Form](#) or alternatively email dataprivacy@vgw.co.

8. How We Protect Your Information

8.1 We have in place, physical, electronic and operational procedures to protect the information that we collect. We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored on our Website. Our security measures are reviewed regularly and updated in keeping up with technological advances.

8.2 We use reasonable means to protect your personal information from misuse, interference, or loss, as well as any unauthorised access, modification or disclosure.

8.3 If we believe that a notifiable data breach has occurred, we will comply with the legislative requirements to notify you of the data breach and any steps taken by VGW to contain and investigate the data breach.

9. How Long Will We Retain Your Information

9.1 We will retain your information for a period of time to reasonably fulfil the purposes specified in this Privacy Policy, unless a longer retention period is required by law.

9.2 We will take reasonable steps to destroy or permanently de-identify any Personal Information where:

- a) we no longer need the Personal Information for any purpose for which your information was collected or for a related purpose; and
- b) we are not required by law, a regulator or a court/tribunal order, to retain your information.

10. Sharing Your Information

10.1 We do not sell, trade, or rent your personal information. However, there are circumstances when we share your personal data with the following categories of third parties:

- a) Affiliates - other companies in the VGW Group;
- b) Service providers – other companies who provide services to you on our behalf; and
- c) Third parties that interact with us in connection with the services we perform.

10.2 If data will be shared with a third party, we require them to maintain the same protections over your data that we provide directly to you and to only perform services on our behalf. Simply put, they are prohibited from using your personal information for purposes other than those requested by us or required by law.

10.3 With Third Parties

We only share information with third parties in limited circumstances including the following:

- a) when you allow us to share your information with third parties;
- b) when providing you with products and services and notifying you about either important changes or developments to the features and operation of those products and services;
- c) with our service providers who enable us to provide our services, such as companies that help us with technology services, storing and combining data, processing payments and redemptions or providing relevant marketing and advertising for our products and services. These service providers will have access to your personal information only to perform services on VGW's behalf and are prohibited from using your personal information for purposes other than those requested by us or required by law. Where service providers use personal information for their own purposes, where permitted by law, such service providers will act as the data controller of that data;
- d) in response to lawful requests by public authorities, including to meet national security or law enforcement requirements, when ordered to do so by any regulatory body and/or under any legal provision contained in the governing law of a particular jurisdiction;
- e) when instructing and authorizing the financial institution with which a user's account is held to disclose any information as may be requested by a regulator in respect of the user's account;
- f) to enforce our terms and conditions set out on our Website, to protect our rights and property and the rights and property of our customers and third parties, to detect fraud or other illegal activities, and to comply with law or legal processes; and

g) to perform customer due diligence including ID verification.

10.4 Transfers

The VGW Group operates in several international jurisdictions and personal information we collect may be transferred to, and stored and processed by, individual companies in the VGW Group or third parties in the European Union, the United States, Canada, Australia, the Philippines or any other country in which we or our service providers maintain facilities. We will ensure that transfers of personal information to any country or organisation are subject to appropriate safeguards. Additionally, when transferring personal information from the European Union, we may use standard contractual clauses approved by the European Commission or otherwise adopt other means in accordance with European data protection laws for ensuring adequate safeguards.

11. Changes to this Privacy Policy

11.1 This Privacy Policy may be updated from time to time to reflect changes in the way we work or the way our work is regulated. We will notify you of material changes and, where required by law, will obtain your consent. Notice may be by the posting of such changes on our Website or by other means in accordance with applicable laws.

11.2 Any changes to the Privacy Policy will become effective when the updated policy is posted on our Website.

11.3 We encourage you to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect.

11.4 This Privacy Policy, in effect as of the last modified date stated below, supersedes and replaces any and all Privacy Policies previously in effect.

12. Contacting Us

If you have specific questions regarding your personal information or how we use it, please contact our Data Protection Officer directly by email at dataprivacy@vgw.co or alternatively please complete the [VGW Access Request Form](#).

Published: 28 February 2023