



Custodian Vaults Pty Limited ABN 54 159 994 108 (**Custodian Vaults**) is committed to protecting your privacy when you purchase our products and services and when you use our website.

The purpose of this Privacy Policy is to explain:

- the application of this Privacy Policy
- the kind of information Custodian Vaults may collect about you, how we collect it, and how we use it
- how we may disclose that information
- how you can access the information we hold about you
- when we may use your information to contact you
- the protection of your personal information

1. Application of this Privacy Policy

Custodian Vaults' Privacy Policy applies to personal information collected by Custodian Vaults, whether we have asked for the information or not. Custodian Vaults is governed by the Australian Privacy Principles (APPs) under the Privacy Act 1988 (Cth).

Custodian Vaults will review this policy regularly, and may update it from time to time. If we make changes, we will post those changes on the privacy page of Custodian Vaults' website.

2. Collection and use of personal information

2.1 Why we collect personal information

Custodian Vaults collects personal information about you:

- **because we need it to provide a product or service that you have requested**, for example, if you have requested information from the Custodian Vaults website, or agreed to licence a safe deposit box from Custodian Vaults;
- **because you work for us**, or apply to us for a job or work experience.

2.2 How we collect information

Broadly, there are two types of information or data we collect:

Information that you specifically give us

For example, you may provide information about yourself when you are filling in a form. This type of information may include your home address, business address, telephone number,

business telephone number, email address and date of birth. The information that you give us may be:

- **Personal information that is required.** In some instances, you must provide personal information if you wish to use a particular service or participate in an activity. For example, Custodian Vaults does not licence safe deposit boxes to people under the age of 18 years.
- **Personal information that is optional.** You may choose to provide some personal information which is not required but is directly related to Custodian Vaults' functions or activities. Usually this type of information will enable Custodian Vaults to improve or broaden the services we can offer you. If you choose not to provide this optional information, we would still be able to offer you the service, but perhaps with fewer options than if you had provided the optional information. For example, if you tell us you are interested in access to a safe deposit box for a certain period, we may be able to provide you with specific Custodian Vaults promotions that matches your interests. If you provide us with unsolicited information that we do not require or which is not directly related to Custodian Vaults' functions or activities, Custodian Vaults may be required to destroy or de-identify that information, provided it is lawful and reasonable to do so.
- **Permissions.** Sometimes you will be asked to confirm that you agree to a particular activity. For example, you may need to expressly agree that you would like to receive a newsletter or to confirm that you agree to the terms and conditions of a competition.

You may be able to make changes to the information you provided us (for example, if you change your email address) or withdraw the permission you gave us for a particular service. We will make it clear how you do that.

Data we collect that tracks your activity

The data on your use of our site may be linked to personal information you have chosen to share with us when you register. Most Internet browsers automatically accept cookies. However, you can instruct your browser, by editing its options, to stop accepting cookies or prompt you before accepting a cookie from the sites you visit.

A cookie is a small information file sent to your computer, mobile or other device when you visit a website. It recognises your device on future visits. These types of files help us remember your visits to the Custodian Vaults website, assisting us in improving your site experience as well as ensuring that you see relevant online adverts or offers. Apart from the cookies that help us remember your browsing preferences, language, or search parameters, another type of performance cookies collect anonymous information on how people use the site. We use third party services such as Google AdWords and Analytics to merge this data with other users to enable us to improve how the Custodian Vaults site operates. This stored data does not save any personal details that might identify you. This process helps us provide you with an online browsing experience that is more suited to your selections in order to make each visit more tailored. We use these cookies to collect information about your browsing habits in order to make advertising relevant to you and your interests.

Our website does not collect personally identifiable information about individuals except when such individuals specifically provide such information on a voluntary basis, such as when registering at our website, requesting a brochure or video, or accessing our "request a reservation" or "book now" feature.

3. Disclosure of personal information

3.1 Disclosure of personal information to third parties

Custodian Vaults may disclose your personal information to third parties for the following purposes:

to provide the service you wish to use;

- to customise and promote Custodian Vaults services which may be of interest to you;
- to provide technical support to you to use Custodian Vaults' services;
- if permitted or required by law; or
- otherwise with your consent.

In many cases, Custodian Vaults imposes contractual restrictions equivalent to those imposed on Custodian Vaults under the Privacy Act in respect of collection and use of personal information by those third parties. In some cases, Custodian Vaults' ability to impose contractual restrictions is limited. In those circumstances, Custodian Vaults will carefully consider the risks to the protection of personal information when entering into arrangements with third parties.

These third parties may be located in Australia or overseas.

We may share your email address and home address with third parties to deliver brochures, videos, information about promotions, news and other information about our website, products, services or special promotions on our behalf.

Custodian Vaults may also disclose your personal information (excluding sensitive information about you) to third parties for the purposes of direct marketing Custodian Vaults' services including brochures, videos, information about promotions, news and other information about our website, products, services or special promotions.

You will be able to opt-out of direct marketing at any time if you so choose.

Under no circumstances will Custodian Vaults sell or receive payment for licensing or disclosing your personal information.

4. Accessing your personal information

You have the right to request access to personal information that is held by Custodian Vaults about you.

You also have the right to request the correction of any of your personal information that Custodian Vaults holds. Custodian Vaults will take reasonable steps to make appropriate corrections to personal information so that it is accurate, complete and up-to-date. To seek access to, or correction of, your personal information please contact Custodian Vaults as follows:

By email: info@custodianvaults.com.au

By telephone: 1300 665 765 or (02) 9011 7355

5. Use of your personal information to contact you

We will never knowingly send you unsolicited commercial electronic messages. Information on the Spam Act 2003 is available from the regulator's website: www.acma.gov.au/spam

We may use information that we know about your likes and interests to tell you about other Custodian Vaults programs, products and services. We may know about your likes and interests because you have provided that information.

6. Protection of your personal information

Custodian Vaults has implemented appropriate physical, electronic and managerial security procedures in order to protect personal information from loss, misuse, alteration or destruction. Custodian Vaults regularly reviews security and encryption technologies and will strive to protect information to the fullest extent possible.

We encourage you to be vigilant about the protection of your own personal information when using third party digital services.

7. Credit card information

Crucially, your credit card details are only stored and transmitted in encrypted form. Unencrypted credit card information is NOT stored on our internet servers. Online credit card payments are currently processed using a third party payment gateway service run by Ezidebit.

If you use your credit card and the transaction is manual rather than electronic, the imprinted record will be stored by Custodian Vaults for the period that financial records are required to be retained.

8. Privacy and Change of Control

In the event Custodian Vaults goes through a business transition, such as a merger, being acquired by another company, or selling a portion of its assets, users' personal information will, in most instances, be part of the assets transferred.

9. Linked sites

Our website may contain links to other sites. We are not responsible for the privacy practices or the content of such web sites. We encourage you to read the privacy statements of any linked sites as their privacy policy may differ from ours.

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