

Privacy Policy

Commitment to Privacy

SPO Markets Pty Limited, ACN 123 456 789, and all its related entities ("SPO Markets", "we", "us", or "our") are dedicated to safeguarding your privacy. We adhere to the Australian Privacy Principles (APPs) in the Privacy Act 1988 (Cth) (Privacy Act), emphasizing the importance of confidentiality and serious treatment of your personal information.

This document outlines how SPO Markets manages any Personal Information we collect related to your use of the SPO Markets Platform (ARSN 123 456 789), including its website. "Personal Information," for this policy, is defined as information or an opinion about an identified individual, or an individual who is reasonably identifiable, regardless of its truth or material form.

This Privacy Policy is applicable to Personal Information collected from Members and potential Members. Further details about membership are available in the Product Disclosure Statement.

Together with the SPO Markets Product Disclosure Statement, Terms and Conditions, the SPO Markets Platform Constitution, and any other periodically adopted terms, this document forms the legal relationship between you and us in respect of your use of the SPO Markets Platform.

Your use of our services, unless stated otherwise, implies consent to the collection of all information provided to us, used in accordance with this Privacy Policy. Capitalised terms in this Privacy Policy are defined in the Product Disclosure Statement related to the SPO Markets Platform.

Management of Personal Information

The Type Of Information SPO Markets Collects

1. Personal Information Collection

To offer our products and services, we collect Personal Information from Members and other individuals (e.g., business contacts, service providers, prospective Members).

The type of Personal Information we collect depends on our relationship with you. It may include:

- Name, age, date of birth, and place of birth.
- Residential and business addresses, email address, and contact numbers.
- Information required or authorised by law.
- Opinions on our products, services, and staff.
- Bank and credit/debit card details.
- User details via cookies

1.1. Sensitive Information

SPO Markets may need to collect sensitive information to comply with laws like the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) (AML/CTF Act), following the guidelines in this Privacy Policy.

This may include government identifiers such as tax file numbers.

1.2. Identification Documents

We might also collect identification documents, including drivers licenses, birth certificates, and passports.

1.3. Non-Provision of Information

If you do not provide requested information, we may be unable to fulfill certain services.

1.4. Usage Data

While using the SPO Markets Platform, we record data like IP address, visit date and time, accessed parts of the platform, and browser type for statistical purposes.

Collection Practices

2. Purpose of Collection

Information registered with SPO Markets is primarily for acquiring Interest and transacting Bricks. We only collect necessary Personal Information.

2.1. Information Usage

The information is used for periodic updates about your investment and general or marketing information about SPO Markets.

2.2. Consent for Information Use

By submitting an online application, you consent to SPO Markets disclosing your information to service providers and using it as described in this Privacy Policy.

2.3. Accessing and Updating Information

To access or update your Personal Information, visit the SPO Markets website or contact us at info@spomarkets.com.

2.4. Notification of Collection

We will inform you about the collection of your Personal Information and refer you to this Privacy Policy for details on its use.

2.5. Legal Compulsion

If legally required to collect or disclose your Personal Information, we will inform you.

2.6. Disposal of Information

When no longer needed, we will responsibly destroy or de-identify your Personal Information, unless legally required to retain it.

Electronic Disclosure

3. Online Interaction

Interaction with the SPO Markets Platform is primarily online.

3.1 Email Communications

On registration, you must nominate an email for receiving information about SPO Markets and your investments. This includes membership confirmations, notices, promotional materials, educational content, financial updates, and supplementary documents.

Use and Disclosure

4. Purpose of Information Use

We collect Personal Information to conduct business and offer requested services. We use or disclose this information for the primary collection purpose or a related secondary purpose, as permitted by Australian law.

4.1 Information Uses Include:

Identity verification, investment management, service provision, updates, communications, third-party relations, business improvement, compliance, security management, legal obligations, and identifying other relevant offerings.

Disclosure to Third Parties

5. Third-Party Privacy Compliance

Personal Information may be disclosed to third parties in Australia for necessary functions.

5.1 Disclosure Limitations

Personal Information is not sold and is disclosed only for relevant functions or as required by law.

5.2 Disclosure Conditions

We disclose Personal Information under certain conditions, including legal requirements, consent, expected disclosures, or for law enforcement purposes.

Cross Border Disclosure

6. Overseas Transfer Conditions

We may transfer Personal Information overseas under specific conditions, such as comparable privacy law adherence or legal requirements.

6.1 International Data Management

While we may handle Personal Information in various countries, our commitment to privacy protection remains, complying with all applicable cross-border data disclosure laws.

Sensitive Information

7. Sensitive Information Collection

We collect sensitive information with consent or as necessary for our functions, following the Privacy Act and APPs.

Unsolicited Information

8. Handling Unsolicited Information

If we receive Personal Information unsolicited, we will handle it per APP guidelines, ensuring it aligns with our collection practices. If it doesn't align, the information will be securely destroyed or de-identified.

Direct Marketing

9. Marketing Communications

We may use your Personal Information to inform you about our products and services.

9.1 Marketing Content

You might receive offers, updates, newsletters, or other relevant information about our services and products, subject to legal permissions.

9.2 Opting Out

You can opt-out of direct marketing communications at any time through your SPO Markets Account settings or by contacting us.

Information Security and Protection

10. Data Security Measures

SPO Markets is committed to protecting your Personal Information from misuse, loss, unauthorized access, or alteration.

10.1 Security Protocols

We use industry-standard security measures, including encryption and access controls, to safeguard your data.

10.2 Restricted Access

Only authorized personnel have access to your Personal Information, and we require third-party service providers to adhere to confidentiality agreements.

10.3 Data Disposal

We responsibly dispose of or de-identify Personal Information when it's no longer needed.

Accessing and Correcting Your Personal Information

11. Contacting SPO Markets

You're welcome to contact us for more information about this Privacy Policy, to access or correct your Personal Information.

11.1 Access Limitations

In certain situations, we may refuse access to your Personal Information, for example, to protect others' privacy or comply with legal requirements.

11.2 Providing Policy Copies

We will provide a copy of this Policy upon request, free of charge.

11.3 Processing Fees

We may charge a reasonable fee for processing access or correction requests.

11.4 Contact Details

For further information, contact SPO Markets Pty Limited, Level 27, 101 Collins Street, Melbourne VIC 3000 Australia, Email: info@spomarkets.com

Requesting Information Correction

12. Correcting Information

We encourage you to request corrections to any outdated or inaccurate Personal Information.

12.1 Response Time

SPO Markets will respond to correction requests within a reasonable timeframe.

12.2 Refusal of Correction

If we refuse to correct your information, we will provide a written explanation and available complaint mechanisms.

12.3 Recording Correction Requests

If we refuse a correction, we will note your request in our records.

12.4 Correction Requests

To request a correction, contact Customer Services at info@spomarkets.com.

Platform Analytics and Cookies

13. Platform Analytics

SPO Markets employs platform analytics measurement software to track traffic patterns to and from the SPO Markets Platform. This helps us analyze the behavior and preferences of our users. The data gathered through these means is non-personally identifiable and is utilized to enhance the SPO Markets Platform.

14. Use of Cookies

Cookies are small text files stored on your device. They help us determine your browser type and settings, track your navigation on the SPO Markets Platform, and maintain the security of your information. This data aids us in providing a tailored and efficient experience on our platform, including the customization of web pages to suit your preferences.

15. Third-Party Service Providers

SPO Markets may engage external service providers to monitor traffic and usage on the SPO Markets Platform. This information is crucial for refining our marketing strategies and online advertising.

16. Cookie Management

Cookies are commonly used across many internet platforms. You have the option to control how cookies are accepted by modifying your browser settings. Please note that disabling cookies may restrict access to certain parts of the SPO Markets Platform, especially secure areas. Therefore, we recommend enabling cookies to fully benefit from our services.

AML/CTF Act Compliance

17. Compliance with AML/CTF Act

In alignment with our obligations under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) (AML/CTF Act), we may collect Personal Information from you before providing any product or service.

18. Information Collection

The types of Personal Information collected for compliance purposes include, but are not limited to, your name, residential address, and date of birth. Occasionally, we might need to gather information about your political activities and opinions to ascertain if you are a politically exposed person as defined by the AML/CTF Act. By providing such information, you consent to its use and disclosure for these purposes.

19. Updating Personal Information

There may be situations where we need to verify or update the Personal Information previously collected or gather additional information, including financial details. In such cases, this information will be collected directly from you or reliable third-party sources.

20. Credit Reporting

Please refer to our Terms and Conditions for detailed information regarding our obligations and your rights related to disclosures to credit reporting agencies.

21. Opt-Out Option

If you prefer not to have your Personal Information disclosed to a credit reporting agency for identity verification under the AML/CTF Act, please inform us via email at info@spomarkets.com. Alternative identity verification methods can be arranged.

Policy Review and Accessibility

22. Regular Review

The Privacy Policy is periodically reviewed to ensure it remains relevant and compliant with current laws and technologies, as well as changes in our operations and practices.

23. Accessibility

The Privacy Policy is publicly accessible on our platform at www.spomarkets.com/privacy. This ensures transparency and easy access for all users.

24. Last Updated

This Privacy Policy was last updated on **15 January 2024**. We encourage users to review it periodically for any updates or changes.

Enquiries and Complaints

25. Making Enquiries or Complaints

If you have any questions about this Privacy Policy, wish to access your Personal Information, or have a complaint regarding the way your information has been handled, please contact our Customer Services at info@spomarkets.com.

26. Response Time

We are committed to addressing any complaints in a timely manner, typically within 30 days of receipt.

27. Further Actions

If you are not satisfied with our response, you have the right to lodge a complaint with the Office of the Australian Information Commissioner. You can contact them by phoning 1300 363 992 or via email at enquiries@oaic.gov.au.