

**SHARESIES**  
**AUSTRALIA**  
**PRIVACY**  
**STATEMENT**

Sharesies Australia Limited (Sharesies)  
ABN 94 648 811 830  
Australian Financial Services Licence No. 529893

# About this Privacy Statement

At Sharesies, we take your privacy seriously and want to ensure that your personal information is protected. This Privacy Statement (this **Statement**) describes how your personal information is collected and handled by Sharesies Australia Limited (ABN 94 648 811 830; AFSL 529893) and its relevant subsidiaries, individually or collectively referred to as Sharesies (**we, our or us**).

When we say “your information” in this Statement, we mean personal information as defined in the Privacy Act 1988 (Cth). Any personal information you provide to us will be collected, and handled in accordance with this Statement, and in compliance with our obligations under the Privacy Act 1988 (Cth).

We may update this Statement without notice—you should review it periodically for any changes. Our latest Statement can always be found on our website or in the Sharesies app.

This Statement is read in conjunction with our [Collection Notice](#).

# Collection, use, and sharing

## What information do we collect?

Typically, we acquire personal information directly from you. However, occasionally we may gather information about you from third parties, such as service providers who help us to verify your identity, process payments, or deliver marketing services.

Some of the personal information we collect is needed to meet our legal obligations, whilst other personal information we may collect from you to be able to provide our products and services. You do not have to give us all the information we ask for, however, it could stop us from providing our products and services to you if we need that information. In some cases we may need to close your Account, for example, to comply with anti-money laundering requirements (we'll try to contact you before doing that).

We collect your information when you:

- sign-up to the Sharesies platform
- place buy or sell orders for investments
- visit our website or use our app
- top-up a Sharesies account or buy a gift card
- sign-up up to receive education content
- join Beta Club, or a feature or product waitlist
- participate in other activities we offer such as competitions or surveys
- contact us to make an enquiry, give us feedback or make a complaint
- otherwise provide your information to us

The type of personal information we collect depends on which Services or Sharesies features you use but may include:

TYPE OF INFORMATION	THE KIND OF PERSONAL INFORMATION MIGHT BE INVOLVED
<b>Personal details and contact information</b>	<ul style="list-style-type: none"> <li>→ name</li> <li>→ residential and/or postal address</li> <li>→ email address</li> <li>→ phone number</li> <li>→ images of your face and ID</li> <li>→ date of birth</li> </ul>
<b>Government identifiers and identity documents</b>	<ul style="list-style-type: none"> <li>→ Tax File Number and country of tax residency</li> <li>→ Securityholder Reference Number (SRN) or Holder Identification Number (HIN)</li> <li>→ Medicare card, passports, driver licence or pension card copies and information</li> <li>→ birth, death, citizenship and marriage certificates</li> </ul>
<b>Voting rights Foreign Government Identifiers and Identity Documents</b>	<ul style="list-style-type: none"> <li>→ foreign passport/s and drivers licence</li> <li>→ tax identification numbers and country of tax residency</li> </ul>
<b>Financial information</b>	<ul style="list-style-type: none"> <li>→ bank account numbers</li> <li>→ credit card numbers</li> <li>→ financial and investment holdings and trade history</li> <li>→ copies of bank statements or utilities bills (proof of address)</li> <li>→ nature and purpose of your investing</li> <li>→ source of funds</li> </ul>
<b>Transaction information</b>	<ul style="list-style-type: none"> <li>→ information regarding your activity on your Sharesies account such as buying or selling, top-ups, logins</li> </ul>
<b>Interaction Information</b>	<ul style="list-style-type: none"> <li>→ details of your interactions with us, including when you contact us, make an inquiry, provide feedback, make a complaint or call us.</li> <li>→ call recordings, where we monitor and record our calls with you. We will let you know if we are recording your call.</li> </ul>

TYPE OF INFORMATION	THE KIND OF PERSONAL INFORMATION MIGHT BE INVOLVED
<b>Digital information</b>	<ul style="list-style-type: none"> <li>→ IP addresses</li> <li>→ device and browser identifiers</li> <li>→ geo-location</li> <li>→ types of authentication used (example touch or face ID)</li> </ul>
<b>Socio-demographic information</b>	Marital status, age, gender, number of dependents occupation and/ or nationality, for example when we are undertaking investor surveys.
<b>Behavioural information</b>	This includes information we generate about how you use Sharesies, for example, habitual investing with regular investments of similar amounts, search terms in-app, or lump sums investments less frequently.
<b>Information you provide to us</b>	<ul style="list-style-type: none"> <li>→ records of your enquiries or communications with us</li> <li>→ customer survey responses</li> <li>→ mailing-list or waitlist sign-ups</li> <li>→ competition entries</li> </ul>
<b>Sensitive Information</b>	<p>We may collect and handle certain sensitive information, including:</p> <ul style="list-style-type: none"> <li>→ race or ethnicity, for example where you may speak with us or provide us with documents in another language or</li> <li>→ criminal history and political affiliation, where we need to know this information for our regulatory or legal obligations</li> <li>→ biometric information (such as fingerprints or face) where we use this information for the purposes of biometric identification</li> </ul>
<b>Information regarding your Personal Circumstances</b>	In order to support you during our interactions with you, we may ask you to provide information about your personal circumstances, including significant life events, details of injury, illness, gambling or addition, and/or unexpected changes to your financial situation.
<b>Information that is publicly available</b>	<p>There may be times where we collect and handle information that is in the public domain, such as information from:</p> <ul style="list-style-type: none"> <li>→ websites, social media sites (including Facebook, Twitter, YouTube, TikTok and Instagram)</li> <li>→ public registers</li> <li>→ podcast and webinar platforms</li> </ul>

We may use cookies and similar technology to remember your preferences and settings, improve our security, analyse traffic and measure the effectiveness and popularity of product features or

marketing. While this technology links to your device, it does not identify you personally. We may link this information to other information we collect about you to provide analytics.

## How do we use your information?

We use your information to deliver our Services. How we use and disclose your personal information depends on the purpose for which we collected it, but may include:

PURPOSE	WE USE YOUR PERSONAL INFORMATION FOR
<p><b>Providing and personalising the delivery of our Services</b></p>	<ul style="list-style-type: none"> <li>→ delivering our products and services to you</li> <li>→ creating and updating your Account</li> <li>→ processing trading, top-ups, withdrawals and payments</li> <li>→ managing fees and charges on our products and services</li> <li>→ communicating with you, providing customer support and managing our relationship with you</li> <li>→ enable you to access our website and app</li> <li>→ providing legal notice</li> <li>→ notifying you of Account activity or upcoming investment opportunities that you are eligible to participate in, for example, a rights offer</li> <li>→ collecting and recovering any money owed to us</li> <li>→ responding to complaints</li> <li>→ managing our security holder records</li> <li>→ any other purpose which you have consented to or that is necessary to provide our products and services to you</li> </ul>
<p><b>Improving Sharesies</b></p>	<ul style="list-style-type: none"> <li>→ reviewing customer feedback</li> <li>→ testing, validating and research of products, services and systems</li> <li>→ quality assurance of our interactions with you, including online chat, complaint purposes</li> <li>→ protecting and optimising our website, products and service, users' experience and business</li> <li>→ resolving operational problems and address or escalate customer concerns</li> <li>→ detecting and preventing fraud or crime</li> </ul>

PURPOSE	WE USE YOUR PERSONAL INFORMATION FOR
<b>Creating market data and behavioural analytics</b>	<p>We may use de-identified records about our customers and their activity to:</p> <ul style="list-style-type: none"> <li>→ provide information about the market and our investors;</li> <li>→ improve the products and Service we offer;</li> <li>→ develop a Service that better meet our customers' needs and preferences; and</li> <li>→ understand and manage our risks</li> </ul>
<b>Marketing</b>	<p>We might use the information you provide us to send marketing or promotional messages about our products or Service, or other third-party products or services that we think might be of interest to you - you can opt out of these communications at any time by using the unsubscribe functionality.</p>
<b>Managing our business</b>	<p>We might use your information to help use run our business. Such as managing our financial position, capital requirements, business capability and testing, managing communications and audits.</p>
<b>Managing our security, risk and crime prevention</b>	<p>We might use your information to:</p> <ul style="list-style-type: none"> <li>→ prevent, identify and investigate suspicious or fraudulent activities</li> <li>→ uplift our systems to prevent cyber-attacks, unauthorised access and other criminal or malicious activities.</li> </ul>
<b>Complying with our legal obligations</b>	<ul style="list-style-type: none"> <li>→ confirm your identity and address</li> <li>→ monitor account activity and alert relevant authorities of potential criminal activity such as fraud, terrorist financing and money laundering</li> <li>→ share information where required by law, for example with regulators, law enforcement agencies or tax authorities</li> <li>→ any other purpose that is required or permitted by law or court order</li> </ul>
<b>De-identifying information</b>	<p>Sometimes we de-identify your personal information to provide insights and analytics services and share information that is de-identified with businesses and governments to help learn about generalised characteristics of customers and provide useful insights to enhance the delivery of products and services to you.</p>

## Who we share your information with

We may share your information with third parties for any of the purposes we've outlined above, or as permitted or required by law.

The types of third parties are listed below:

TYPE OF THIRD PARTY	DESCRIPTION
<p><b>Other members of the Sharesies Group</b></p>	<p>We might share your information between members of the Sharesies Group in connection with any purpose set out in this Statement.</p> <p>The Sharesies Group is comprised of the various entities ultimately owned by Sharesies Group Limited (NZBN 9429048719322), this includes, but isn't limited to the below members of the Sharesies Group:</p> <ul style="list-style-type: none"> <li>→ Sharesies Australia Nominee Pty Limited (NZ) (NZBN 34 650 402 314), who supports us with providing custodial services;</li> <li>→ Sharesies Limited (NZ) (NZBN 9429045952838), who support us with providing our products and services; and</li> <li>→ Sharesies Nominee Limited (NZ) (9429046108982), who supports us with providing custodial services.</li> </ul>
<p><b>Our suppliers or service providers</b></p>	<p>To provide you with our products and services, and to use your information for the purposes mentioned in this Statement, we may need to liaise with third parties, some of which are based overseas and not within Australia. This includes:</p> <ul style="list-style-type: none"> <li>→ stock exchanges and share registry service providers</li> <li>→ biometric technology providers</li> <li>→ Financial institutions, including banks</li> <li>→ identity verification databases</li> <li>→ investment providers</li> <li>→ in-app messaging service providers</li> <li>→ card payment processors</li> <li>→ business strategy advisors</li> <li>→ data analytics or research partners</li> <li>→ mail-out and marketing providers, including third parties</li> <li>→ cloud storage providers and data warehouse suppliers</li> <li>→ our engaged advisors, consultants, auditors and business partners</li> </ul>

TYPE OF THIRD PARTY	DESCRIPTION
<b>Regulators and law enforcement agencies</b>	<ul style="list-style-type: none"> <li>→ The Australian Transaction Reports and Analysis Centre (AUSTRAC)</li> <li>→ Australian Securities and Investments Commission</li> <li>→ Federal Police</li> <li>→ any other domestic or international regulatory authority where disclosure is required or permitted by law</li> </ul>
<b>Authorised third parties</b>	<ul style="list-style-type: none"> <li>→ your power of attorney</li> <li>→ the executor or administrator of your estate</li> <li>→ your attorney or legal representative</li> <li>→ your legal guardian</li> </ul>

## Sending information overseas

Some of the entities we send information to are based overseas. This includes but isn't limited to Sharesies Group members located in New Zealand and third parties operating and storing data outside of Australia, including those in New Zealand and the United States of America.

The reasons we might send your information overseas include completing international transactions and providing our products and services, or to comply with laws and assist government agencies and law enforcement.

Where we send your information overseas, we ensure there are appropriate privacy and data handling arrangements in place to protect your information.

We may share your information if we sell or merge some or all of our business or assets with another company.

We can use and share information that does not identify you for any purpose.



## Storing your information

### Keeping your information safe

We take all reasonable steps to protect your information from misuse, interference and loss, as well as unauthorised access, modification or disclosure.

We hold your information in electronic or hard copy form on secure systems and within secure buildings. Your information is encrypted in transit and at rest using industry standard encryption practices. We use techniques such as hashing, maskings and tokenising (replacing personal information with a randomised identifier) to avoid unnecessarily displaying your information.

We have an in-house security team responsible for maintaining and continuously improving our security position. Our staff undergo information security training and your information is configured within our secure system to ensure it is only available to the people or systems that need it. Our systems undergo regular penetration testing, audits and security testing by third-party specialists to verify that systems are working as intended and we are prepared as a business to weather disruptive events with resilient architecture, backups and recovery plans.

Despite all our measures, we cannot guarantee the security of the transmission or storage of your information.

### Retaining and deleting your information

We may keep your information for as long as you have an Account and for a minimum period of seven years after your Account is closed to comply with regulatory, tax, insurance and other requirements. Beyond that period we may keep your information for as long as we believe necessary for the purposes set out in this Statement, for example, we may keep your information for an indefinite time if we believe it is necessary for the purposes of fraud prevention.

## Accessing your information

### Correcting or updating information

Most of your information held by Sharesies can be accessed through your Account. You may request that we correct inaccurate information by contacting us using the contact details set out on this Statement or contacting us through the app. If we don't think the information needs correcting, we will let you know why.

We will take reasonable steps, consistent with our privacy obligations in the Privacy Act, to correct or update information.

### Requesting access to specific information

Where you seek information that is not already available through your Account, you can request access to the specific information by contacting us using the contact detail on this Statement or contacting us through the app. We may charge an administration fee to cover the time we spend gathering the information you want. We'll let you know how much any administration fee it is likely to be before fulfilling your request.

If you've made a request, we'll try to make the requested information available to you within 30 days. If we can't, we will let you know why we need longer.

Sometimes we are unable to share certain information with you or destroy certain information you request us to destroy because of legal reasons.

## Contact us

If you have any questions about our Privacy Statement or wish to access or amend your information that we hold, please contact us at:

<b>EMAIL</b>	help@sharesies.com.au
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If you have concerns that we have not met our obligations to you as required by the Privacy Act, you may contact us using the email listed above.

We value your feedback and appreciate you letting us know when you have a complaint. If you have a complaint, you can contact us, and we will take a look and try to resolve it.

You can get in touch with us via the help icon or the complaints button in the Sharesies app or through one of the below channels.

<b>EMAIL</b>	help@sharesies.com.au
<b>MAIL</b>	PO Box Q1410 Queen Victoria Building NSW 1230
<b>PHONE</b>	1800 959 366 (toll-free)

Where we have not resolved your complaint to your satisfaction, you can contact the Australian Financial Complaints Authority (AFCA), our external dispute resolution provider.

AFCA provides a fair, free and independent dispute resolution for financial complaints.

The details of AFCA are:

<b>WEBSITE</b>	www.afca.org.au
<b>EMAIL</b>	info@afca.org.au
<b>PHONE</b>	1800 931 678 (toll-free)
<b>POST</b>	Australian Financial Complaints Authority GPO Box 3 Melbourne VIC 3001

More information about your rights and our obligations in respect to privacy and information on making a privacy complaint are available from the Office of the Australian Information Commissioner at:

<b>WEBSITE</b>	www.oaic.gov.au
<b>PHONE</b>	1300 363 992
<b>EMAIL</b>	enquiries@oaic.gov.au
<b>MAIL</b>	GPO Box 5218 Sydney NSW 2001



## **Contact us**

*help@sharesies.com.au*

*<https://www.sharesies.com.au>*

*PO Box Q1410  
Queen Victoria Building  
NSW 1230*