



## MELD GOLD PRIVACY POLICY

Last updated [July 2023]

In this Privacy Policy:

- (a) 'us', 'we', 'our' and 'Meld Gold' means Meld Gold Pty Ltd ACN 638 548 231 and our related bodies corporate; and
- (b) 'you' and 'your' means, as applicable:
  - (i) a person or entity who uses the Platform to buy or sell physical gold and/or silver or the gold-backed and silver-backed digital currency managed by us (**Meld Certificates**) (each, a **Customer**);
  - (ii) a person or entity who accesses the Platform for the purpose of supplying its services in respect of physical gold or silver (each, a **Provider**); and
  - (iii) any individual accessing or using our platform and associated websites (**Platform**) including, but not limited to, a Customer or Provider.

Your privacy is important to us, which is why we've created this Privacy Policy. Our Privacy Policy sets out what personal information we collect about you and how we use, store and disclose that information. Please read the following policy carefully to understand our views and practices regarding your personal information and how we will treat it. Personal information includes information or an opinion about an individual that is reasonably identifiable. For example, this may include your name, age, gender, postcode and contact details.

By providing personal information to us, you consent to our collection, use and disclosure of your personal information in accordance with this Privacy Policy and in accordance with any other arrangements that apply between us. We may change our Privacy Policy from time to time by publishing updates to it on our Platform. We encourage you to check the Platform periodically to ensure that you are aware of our current Privacy Policy.

### What personal information do we collect?

We collect the following types of information about you:

#### (a) Information that you provide to us directly

You may provide personal information directly to us in a number of ways, including:

- (i) when you visit and interact with the Platform and related software;
- (ii) when you provide us with identity verification information and financial information in connection with setting up your account on the Platform;
- (iii) when you sign up for an account with us or sign up to our mailing list;
- (iv) when you engage in transactions with us and/or other Customers and/or Providers;
- (v) when you submit an application to join as a Customer or Provider;
- (vi) when you provide us with any feedback in connection with your use of the Platform; or
- (vii) when you contact us independently of the Platform, such as by email, phone or in person.

The personal information you provide in these circumstances may include your name, email address, billing address, forms of identification, login details, purchase records or other information needed by us to allow us to provide our services to you or to enable your interaction with us.

#### **(b) Information from third party sources**

We may receive your personal information from third parties, including Providers, where you have indicated your interest in the Platform and that third party has assisted you in creating an account on the Platform or has otherwise referred you to the Platform.

If a Provider has referred you to our Platform, then that Provider may provide us with your details (including ongoing investment and transaction details).

#### **(c) Device information**

Like many websites, when you use the Platform, we automatically collect certain information about your interaction with the Platform including information about your web browser, IP address and time zone. Additionally, as you use the Platform, we collect information about the particular sections of the Platform that you use and how you interact with the Platform. We refer to this automatically collected information as '**Device Information**'.

We collect Device Information using the following technologies:

- (i) "cookies" which are data files that are placed on your device or computer and often include an anonymous unique identifier;
- (ii) "log files" which track actions occurring on the Platform, and collect data including your IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps; and
- (iii) "web beacons", "tags" and "pixels" which are electronic files used to record information about how you browse the Platform.

You can control or reset your cookies through your web browser and, if you choose to, you can refuse all cookies. However, some of the features of the Platform may not function properly if you disable the ability to accept cookies.

### **How do we use your personal information?**

We use the information we collect from and about you for the following purposes:

- (a) **Verifying your identity:** We are required by law, including *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth), to verify your identity by conducting screenings or due diligence checks. To do this, we use your personal information.
- (b) **Providing our products and services:** We use the information that you give to us to provide the Platform. This includes allowing you to create an account and to log in to your account, recognising you across different devices, and facilitating payments and transactions in connection with your use of the Platform.
- (c) **Communicating with you:** We use your contact information to send communications to you about important changes or updates to the Platform. When in line with the preferences you have shared with us, we also provide you with information or advertising relating to the Platform.
- (d) **Performing data analytics:** We use information about you to help us improve the Platform, including by generating analytics about how our customers browse and interact with the Platform, for marketing purposes and to assess the success of our marketing and advertising campaigns.
- (e) **Collecting and processing payments:** We use your information to conduct blockchain transactions in connection with the sale and purchase of our Meld Certificates.

- (f) **Customising our products and services for you:** We use information about you to make sure that the provision of the Platform is customised to your needs.
- (g) **Keeping the Platform secure:** We use information about you to screen for potential risk and fraud, and to identify violations of this Privacy Policy and any terms and conditions that apply to users of our Platform from time to time.
- (h) **Where required by law:** We will use or disclose your information where we reasonably believe that such action is necessary to: (a) comply with the law and the reasonable requests of law enforcement or a government authority; (b) to enforce any agreement we have in place with you or to protect the security and integrity of the Platform; and (c) to exercise or protect the rights, property or personal safety of our business, our customers or others.
- (i) **Where you have given your consent:** We may seek your consent to use your information for a particular purpose. Where you give your consent for us to do this, we will use your information in accordance with that purpose. You can withdraw your consent to these additional uses at any time.

You may at any time refuse to provide the personal information that we request. However, this may limit or prohibit our ability to provide the Platform to you. You may withdraw your consent for us to process or deal with your personal information at any time by contacting us in accordance with our 'Contact us' section below.

## Direct marketing

When using our Platform, you consent to our affiliates and Providers using your personal information to send you information, including promotional material, and contacting you in connection with products and services that you may be interested in via email, direct mail, SMS and MMS messages.

If you do not want to receive marketing information from us, or our affiliates and Providers, you can unsubscribe in any of the following ways:

- (a) clicking on the 'Unsubscribe' button or subscription preferences link in a direct marketing email that you receive; or
- (b) contacting us using the contact details specified below.

## Automated decision making

Our operation of the Platform relies on automated analysis of personal information provided by you, alongside information received from fraud prevention agencies. We may use criteria such as your personal information to validate your identity against public records on an automated basis or without human/manual intervention. We do this on the basis that it is necessary for us to enter into a contract with you. If you fail to meet these criteria, your application to become a Customer will be rejected.

You have the right to request that we provide information about our automated decision-making methodology and ask us to verify that the automated decision has been made correctly. We may reject such a request, as permitted by applicable law, including when providing the information would result in a disclosure of a trade secret or would interfere with the prevention or detection of fraud or other crime. However, generally in these circumstances we will verify (or request the relevant third party to verify) that the algorithm and source data are functioning as anticipated without error or bias.

## Residents of the European Economic Area ("EEA")

If you are located in the EEA, you have certain additional rights under European data protection laws regarding your personal information, including the right to request deletion and the right to data portability. We are a data controller for the purposes of European data protection laws.

For personal information subject to the European data protection laws, we rely on the following legal bases to process your information:

- (a) where you have given your consent for us to use your information;
- (b) where the processing is necessary to perform a contract that we have with you, for example when you use the Platform; and
- (c) our legitimate business interests, such as improving and developing the Platform and marketing new features or products (but only where our legitimate interest is not overridden by your interest in protecting your personal information).

In addition, if you are located in the EEA, we must ensure that international transfers of your personal information comply with European data protection laws. The European Commission has the power to determine, on the basis of the European data protection laws, whether a country outside the European Union offers an adequate level of data protection by making an 'adequacy decision'. To date, the European Commission has not adopted an adequacy decision in respect of Australia. Instead, we rely on other legal bases to lawfully transfer personal information around the world (including transfers to countries like Australia where an adequacy decision has not been adopted), including asking for your consent or transferring personal information subject to European Commission-approved contractual terms.

If you are unhappy with our data practices, you also have a right to lodge a complaint with your local supervisory authority.

### **Who do we disclose personal information to?**

Outside of the authorised personnel employed by us, we only share your personal information with third parties that meet the data privacy conditions described in this Privacy Policy. These third parties help us use your personal information in the ways described above, and include:

- (a) if you are a Customer, to third parties that enable us to conduct identity checks as required by AUSTRAC, the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) and our internal policies;
- (b) marketing platforms, communications platforms, contractors and other third party service providers who we engage to help us process personal information and other data;
- (c) if you conduct a transaction with us that requires payment by you, some of your details may be provided to third parties to allow the transaction to be completed;
- (d) our Providers to enable these Providers to process your transactions conducted via the Platform;
- (e) if a Provider has referred you to our Platform, then your details (including ongoing investment and transaction details) may be provided to that Provider or a related entity;
- (f) government third parties, including government agencies, regulatory bodies and law enforcement agencies as required, authorised or permitted by law;
- (g) a third party that acquires or intends to acquire us or our assets; and
- (h) other entities if you have given your express consent.

### **International transfers of personal information**

If you are located in Australia, your personal information will be stored on servers located in Australia. However, your personal transaction may be transferred to third parties located overseas that are using our Platform or who we engage to provide us with services. The countries that your personal information will be transferred to will depend on the location of a particular user of our Platform.

These transfers are made in order to assist us to provide you with, and improve, the Platform and to process transactions made in connection with the provision of the Platform. When we transfer information to countries other than your own, we take reasonable steps to ensure that the recipients of such information do not breach our Privacy Policy by entering into contractual arrangements with such third parties.

When you use the Platform, your information may also be shared with Customers or Providers (as applicable) located overseas who may be interested in connecting with you.

## **Anonymity**

Our Meld Certificates and other cryptocurrencies may not be fully anonymous as a result of the public digital ledgers reflecting these currencies. Generally, anyone can view the balance and transaction history of any public wallet address. We (among others) can match your public wallet address to other information about you and may be able to identify you from a blockchain transaction. Furthermore, third parties may use data analytics to identify other information about you. Please note that such third parties have their own privacy policies. We have no control over, and are not responsible for, the privacy practices of these entities. We do not accept any responsibility or liability for their policies or processing of your personal information.

## **Changing or deleting your personal information**

You may update certain account information such as your name and email address by logging into your account and changing your profile settings. You can also stop receiving promotional email communications from us at any time by clicking on the “unsubscribe link” in the relevant communication.

You may also access, review, update, rectify or delete your personal information by contacting us. We will respond to all requests within a reasonable timeframe. Please note that deleting your personal information may limit our ability to provide the Platform to you.

We may limit or reject your request in certain cases, including without limitation where the burden or expense of providing access would be disproportionate to the risks to your privacy for that particular situation, where the rights of other persons would be violated or as required by law or governance purposes.

If you need further assistance regarding your access and control of your personal information, please contact us.

## **Links to third party websites**

The Platform may contain links to the websites of other entities. If you click on such links, you will be transferred to the website of these entities. We have no control over, and are not responsible for, the privacy practices of these entities. You should read the privacy policy of these entities to find out how they handle your personal information when you visit their websites.

## **Security**

We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it (including encryption and password protection).

However, no method of transmission over the Internet using industry standard technology is 100% secure. Therefore, we cannot guarantee the absolute security of your information.

## **Data Retention**

When you register as a Customer and/or Provider through the Platform, we will maintain the personal information you have provided for our records because we need this information to operate the accounts you have with us, to deliver the Platform to you and for the other purposes set out in the ‘How do we use your personal information?’ section. We will retain this information for as long as is necessary for the purposes for which it is being processed or where we are otherwise required by law to retain it.

## **Changes to our Privacy Policy**

We reserve the right to modify or update this Privacy Policy at any time in order to reflect, for example, changes to our practices or for other operational, legal or regulatory reasons.

Any modifications to this Privacy Policy will be effective upon our publication of the new terms and/or upon implementation of the new changes to the Platform (or as otherwise indicated at the time of publication). In all cases, your continued use of the Platform after the publication of any modified Privacy Policy indicates your acceptance of the terms of the modified Privacy Policy.

## **Contact us**

Thank you for taking the time to read this. Please don't hesitate to get in touch if you have any queries about the use of your personal information – email us at [contact@meld.gold](mailto:contact@meld.gold)

If you are unhappy with how we handle your complaint or are concerned that we have not complied with your legal rights or applicable privacy laws, you can also contact the Office of the Australian Information Commissioner and make a complaint at <https://www.oaic.gov.au/privacy/privacy-complaints/> or by writing to:

Director of Compliance  
Office of the Australian  
Information Commissioner  
GPO Box 5218  
Sydney NSW 2001