

BPS Financial Privacy Policy

1. About this Policy

BPS Financial Pty Ltd ABN 99 604 899 381 ("**BPS**") respects your privacy. This Privacy Policy describes the information we collect, and the manner in which we may use such information. We are committed to ensuring that to the best of our ability we meet all the requirements of the Australian Privacy Principles ("**APPs**") and the Privacy Act 1988 (Cth) ("**Privacy Act**"). Accordingly, this Privacy Policy has been developed in accordance with the APPs and the Privacy Act. Please read this Privacy Policy carefully to understand how any personal information collected by BPS is used.

The Qoin website (the "**Site**"), the Q Wallet or any other applications or software (collectively the "**App**") is used by BPS to give you access to the Qoin ecosystem and to allow you to purchase goods and services using Qoin, and to trade Qoin on participating digital currency exchanges.

Access to the App, the Site and Qoin is conditional on you accepting the terms of this Privacy Policy. The Privacy Policy applies to the collection, storage, use and disclosure by BPS of the personal information of the individuals using the App, the Site and Qoin.

If you have any further questions or if you wish to receive more information on our information practices and Privacy Policy, please contact our Privacy Officer at the details shown below.

2. Collection of information

BPS collects information about you in 3 different ways:

Information you give us: When you fill out the registration forms on our App or on our Site, we will ask you to provide certain information about yourself. We also collect information when you:

- a) report any problem to us;
- b) use certain features on our App and/or Site;
- c) request any support from us;
- d) complete any survey or questionnaire we send to you. This information may include your name, mailing address, e-mail address, or phone number.

Information we collect about you or you provide to us: This includes information automatically collected when you visit or access the App or our Site. For example:

- a) technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet and your log-in information, browser type and version, time zone setting, browser plug-in and versions, operating system and platform;
- b) information about your visit, including the full Uniform Resource Locators (URLs), clickstream to, through and from our Site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information which include scrolling, clicks and mouse-overs, methods used to browse away from the page any phone number used to call us;
- c) personal identification information such as full name, date of birth, nationality, gender, signature, utility bills, photographs, phone number, home address, and/or email.

We will not collect any sensitive information about you which is not reasonably necessary for us to carry out our functions or activities for example, information that may reveal your race, ethnic origin, political opinions, religious or philosophical beliefs, trade union memberships or details of health or disability. Exceptions to this include:

- a) where you have given express consent to us to do so and the personal information is reasonably necessary for us to carry out our functions or activities;
- b) the use of the information is required by law or legal process.

Any such disclosure will be done in accordance with the terms of this Privacy Policy and the APPs. Where we share information for the purposes of data analytics, this information will be appropriately de-identified so that it is not personal information and you will not be personally identifiable.

Please note if we are unable to collect personal information we reasonably require, we may not be able to provide our functions or activities to you or the organisation with which you are connected.

Information we receive from third parties: We work with third parties and we may receive information about you from them, for example, business partners, sub-contractors in technical payment and delivery services, advertising networks, analytics providers, search information providers, or credit reference agencies. We will notify you when we receive information about you from them and the purposes for which we intend to use that information.

Our App, our Site or our communication from time to time contain links to third party websites over which we have no control. If you follow a link to any of these websites, please note that they have their own practices and policies. We encourage you to read these privacy policies or statements of these websites and understand your rights. We accept no responsibility or liability for any practices of third-party websites.

We only retain personal data for so long as is necessary for our services or for as long as is required by law.

3. Use of information by BPS

We use this information:

- a) To improve our marketing efforts, by analysing App and Site usage and customise our App's and Site's content and layout.
- b) Deliver, improve and develop our technology.
- c) To research, design and launch new features or products.
- d) To present content and information on our App and in our Site in the most effective manner for you and for the device you use.
- e) To provide you with alerts, updates, materials or information about our products and services or other types of information you either requested or signed up to.
- f) To communicate with you and respond to your questions and requests.
- g) We may also use this information to directly market new products and services (via e-mail and other on and off-line communications) to you. This involves sending you information about products and services by post, telephone or any form of electronic communication.

If you do not wish to receive these communications from us, please notify us by e-mail at support@qoin.world to opt out.

4. Who will see or have access to your information

For the purposes of providing you with access to our App and Site and in order to deliver the services that we provide to you, we may share your personal information with third parties such as , any of our subsidiaries or related body corporates (including Block Trade Exchange Limited), contractors, auditors, advisers, agents, financial institutions, service providers and suppliers.

In order to deliver the services that we provide to you. We may disclose your personal information to other organisations only after ensuring that such organisations comply with the Privacy Act 1988 (Cth). Otherwise, we will not disclose personal information to any third party without first obtaining your permission, except where required or permitted by law, or permitted elsewhere in this Privacy Policy.

In the event of a security incident involving unauthorised access, use or disclosure of personal information where a third party with whom we share personal information is involved, we will seek to work cooperatively with them to protect the personal information we have shared with them.

We may disclose to third parties' aggregate anonymous statistics regarding our users, traffic analyses and other information regarding or collected through our App and Site. We may also collect and store personal information in the following circumstances:

a) Security

We collect and store personally identifiable information using encryption technology that encrypts the information you input before it is sent to us via the Internet. In addition, all the information we collect on the App and Site is stored on our secure servers which are in a restricted access area and is password protected.

We store all other material that contains personally identifiable information on our dedicated cloud servers. These premises are kept secure at all times.

We restrict access to personal information to our employees, service providers and contractors on a strictly need to know basis and to ensure that those persons are subject to contractual confidentiality obligations.

Please note, however, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the App and Site. Any transmission is at your own risk.

b) Keeping your personal information secure

BPS's security measures are designed to assist in ensuring that your personal information is not accessed by unauthorised personnel, lost or misused. If you reasonably believe that there has been an unauthorised use or disclosure of your personal information, please let us know by contacting our Privacy and Data Protection Officer (contact details below).

5. Correcting, changing and updating your information

You may gain access to personal information that BPS has collected about you and you may request to have any of your personal information corrected or updated by contacting the Privacy Officer at the details below.

BPS reserves the right to change, modify, or revise this Privacy Policy in order to comply with any applicable laws or for any other reason at any time. You will be deemed to have consented to such variation by your continued use of the App and Site following any changes being made. Therefore, you should check the Privacy Policy periodically to read about any changes, modifications, or revisions. You may wish to check it each time you submit personal information.

6. Keeping your personal information accurate

The personal information we hold about you (such as name and email address) is kept so that we may correctly identify you and provide services to you. We take all reasonable steps to ensure that personal information held by us is accurate, up-to-date, complete, relevant and not misleading. If you believe that any of your personal information is not accurate, up-to-date, complete, relevant and not misleading, please contact us (see below) and we will take all reasonable steps to correct it within a reasonable time.

7. How long we hold your personal information

We will retain your information for as long as your Q Wallet is active and for as long as necessary to comply with our legal obligations, resolve issues, address queries and enforce our agreements. If you no longer wish to use our App or Site, you may request that your Q Wallet be deactivated by contacting the Privacy Officer using the contact details provided above. However, we may still retain your information to comply with our legal obligations, resolve issues, address queries and enforce our agreements.

8. Breaches of security

Notwithstanding the reasonable steps taken to keep information secure, breaches may occur. In the event of a security incident we have in place procedures to promptly investigate the incident and determine if there has been a data breach involving personal information, and if so, to assess if it is a breach that would require notification. If it is, we will notify affected parties in accordance with the Privacy Act requirements.

9. How you can access, change or delete personally identifiable information

You have a right to request a copy of the personal information we hold about you, except where the law allows us to refuse your request. If you wish to receive a copy of this information, please address your request to the Privacy Officer. We will deal with your request promptly and in any case at least within 30 days of the date of receiving it. We will give access to the information in the manner you request, where reasonable and practicable. This will be subject to any exemptions allowed under the Privacy Act. We will correct or delete inaccurate or incomplete personal information we hold about you at your request, except where the law allows us to refuse your request.

10. Contacting BPS about this Privacy Policy

Please address all requests and questions about this Privacy Policy to the Privacy Officer using the contact details provided below:

Privacy Officer

Email: privacy.officer@qoin.world

11. Contacting BPS about Privacy matters

When contacting us you have the option to either not identify yourself or to use a pseudonym, unless it is impracticable for us to communicate with you that way or we are required or authorised under Australian law to only deal with individuals who have identified themselves.

12. Privacy Officer Details and Feedback

We appreciate your comments and questions regarding this Privacy Policy. If at any time you believe we have handled your information otherwise than in accordance with this Privacy Policy or the Privacy Act, please notify the Privacy Officer using the contact details provided above and we will use commercially reasonable efforts to investigate and, if we deem reasonably appropriate, remedy the matter.

13. Privacy Commissioner

If you require more information about privacy laws generally, please contact:

The Privacy Commissioner:
Office of the Federal Privacy Commissioner
GPO Box 5218, Sydney NSW 2001
Phone 1300 363 992
Website: www.oaic.gov.au

14. Dispute resolution

We have an internal dispute resolution procedure which is designed to resolve any issues raised by you. If you have a complaint, you should contact us on:

Email: advice@qoin.world

Mail: Level 4, 130 Bundall Road, Bundall, Queensland, 4217

We aim to acknowledge receipt of all complaints within 5 business days; and resolve all complaints within 45 days. This may not be possible in all circumstances.

Where we cannot resolve a complaint within 45 days, we will notify you of the reason for the delay as well as an indication of when we expect to resolve the complaint.

If you are not satisfied with how your complaint was dealt with or resolved or your complaint has not been satisfactorily resolved within 45 days, you have the option of contacting the Australian Financial Complaints Authority (AFCA), of which BPS is a member and its member number is 74239. AFCA can be contacted by calling 1800 931 678 or by writing to:

Australian Financial Complaints Authority (AFCA)

GPO Box 3

Melbourne Vic 3001.

Version: 2

Date: August 2023