



ABC Bullion Privacy Policy

1. ABC Bullion commitment to privacy

- 1.1. Protecting your privacy and the confidentiality of your personal information is extremely important to us. This Privacy Policy is for customers of Australian Bullion Company (NSW) Pty Ltd (ACN 002 858 602) and its Related Bodies Corporate (as defined in section 50 of the *Corporations Act* 2001 (Cth)), collectively ABC. ABC is committed to protecting your privacy when you purchase our products and services and when you use our website in accordance with the Australian Privacy Principles (APPs) under the Privacy Act 1988 (Cth) (**Privacy Act**) and in accordance with other applicable privacy laws.
- 1.2. The purpose of this Privacy Policy is to explain:
- (a) the application of this Privacy Policy;
 - (b) the kind of information ABC may collect about you, how we collect it, and how we use it;
 - (c) how we may disclose that information;
 - (d) how you can access the information we hold about you;
 - (e) when we may use your information to contact you;
 - (f) the protection of your personal information; and
 - (g) how you can make a complaint.
- 1.3. In this Privacy Policy, "we", "us" and "ABC" refers to Australian Bullion Company (NSW) Pty Ltd and its Related Bodies Corporate, and "you" refers to any individual about whom we collect personal information.
- 1.4. This Privacy Policy applies to personal information collected by ABC. ABC will review this policy regularly and may update it from time to time. If we make changes, we will post those changes on this website.

2. Collection and use of personal information

- 2.1. ABC collects personal information reasonably necessary to carry out our business and provide the services that we offer you. ABC collects information about you:
- (a) **because we need it to provide a product or service that you have requested**, for example, if you have requested information from this website; or



- (b) **because you work for us**, or apply to us for a job or work experience; or
- (c) **because we use it to inform you of our activities**, including any relevant events and services; or
- (d) **because we are legally required to**, for example, to meet our 'Know Your Customer' requirements under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)* and any other anti-money laundering and counter-terrorism funding regulations or instructions. For further information about ABC's verification process please refer to our Terms and Conditions.

3. Information collected from customers or prospective customers

3.1. When you enquire about our services or when you become a customer of ABC, a record is made which includes your personal information.

3.2. The type of personal information that we collect will vary depending on the circumstances of collection and the kind of service that you request from us, but will typically include:

(1) 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:

(a) Personal information that is required. In some instances, you must provide personal information if you wish to use a particular service, purchase or sell precious metal to or from us or participate in an activity.

(b) Personal information that is part of our online ID verification process:

- (i) your full name, phone numbers, email addresses, residential address, delivery address, and date of birth;
- (ii) scans of your identity documents (for example, driver licence, passport, birth certificate, Medicare card or other government issued documents);
- (iii) extracts of key information from your identity documents (for example, details from your driver licence, passport, birth certificate, Medicare card or other government issued documents).

(c) Personal information that is optional. You may choose to provide some personal information which is not required but is directly related to ABC's functions or activities. Usually, this type of information will enable ABC 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 purchasing specific precious metals, we may be able to provide you with specific ABC promotions that match your interests. If you provide us with unsolicited information that we do not require or which is not directly related to ABC's functions or activities, ABC may be required to destroy or de-identify that information, provided it is lawful and reasonable to do so.

(d) 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.

(2) Data that tracks your activity. Refer to Clause 6.

- 3.3. Please note that providing false or misleading information about your identity is an offence under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth).
- 3.4. 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.

4. Information collected from prospective employees or applicants

- 4.1. We collect personal information when recruiting personnel, such as your name, contact details, qualifications and work history. Generally, we will collect this information directly from you.
- 4.2. We may also collect personal information from third parties in ways which you would expect (for example, from recruitment agencies or referees you have nominated). Before offering you a position, we may collect additional details such as your tax file number and superannuation information and other information necessary to conduct background checks to determine your suitability for certain positions.

5. Information collected from visitors to our websites

- 5.1. You may visit our website www.abcbullion.com.au without identifying yourself. If you identify yourself (for example, by providing your contact details in an enquiry), any personal information you provide to ABC will be managed according with this Privacy Policy.



5.2. Data that tracks your activity may be collected upon use of our website. Refer to Clause 6.

6. Data we collect that tracks your activity

6.1. Data regarding your use of this and associated websites 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.

6.2. 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 this 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 collects 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 this 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.

6.3. This website does not collect personally identifiable information about individuals except when such individuals specifically provide such information on a voluntary basis.

7. Personal Information Collection Notice

7.1. You may also refer to ABC's Collection Notice on the ABC site for further information on the circumstances regarding:

- (a) the collection of your personal information;
- (b) ABC's legal requirements to collect your personal information;
- (c) the consequences if personal information is not collected; and
- (d) whether we are likely to disclose your personal information to overseas recipients.



8. Disclosure of personal information to Related Bodies Corporate

- 8.1. ABC may exchange your personal information with Related Bodies Corporate of ABC so that ABC may provide an integrated service to its customers.

9. Disclosure of personal information to third parties

- 9.1. ABC may disclose your personal information to third parties, including Commonwealth and State government departments, verification service providers and other organisations, for the following purposes:
- (a) to provide the service you wish to use;
 - (b) to customise and promote ABC services which may be of interest to you;
 - (c) to provide technical support to you to use ABC services;
 - (d) to conduct customer due diligence, such as verifying your identity as required by law;
 - (e) if permitted or required by law; or
 - (f) otherwise with your consent.
- 9.2. The third party verification service providers in which your personal information may be disclosed to include, but are not limited to:
- (a) Trulioo: www.trulioo.com
 - (b) Equifax: www.equifax.com
 - (c) GBG: www.gbg-greenid.com
 - (d) LSEG World-Check: www.lseg.com
- 9.3. Your personal information may also be disclosed to the Documentation Verification Service (DVS). The DVS is a system that checks whether biographic information on identity documents match the original records held by the issuing authority. The system does not store personal information and ensures that only the necessary details are collected. Proceed to www.idmatch.gov.au/resources/identity-verification-services-privacy-statement, published by the Attorney-General's Department, to access more information explaining how personal information shared with the DVS is handled.

How we use the DVS

We will use DVS to confirm the authenticity of the identity documents you provide to us – such as your passport.

Before you are required to provide any Identifying Information for the purposes of DVS verification, we will ask you to provide your express consent.

The identity document you submit will be sent to the DVS and ABC will be advised if the identity information you provide matches the official government record.

- 9.4. ABC is subject to the *Privacy Act 1998 (Cth)* and the *Identity Verification Services Act 2023 (Cth)* in respect of collection and use of personal information by those third parties. In some cases, ABC's ability to impose contractual restrictions is limited. In those circumstances, ABC will carefully consider the risks to the protection of personal information when entering into arrangements with third parties.
- 9.5. We use third-party verification service providers, as listed in Clause 9.2, to coordinate electronic verification processes for ABC (including by performing additional matches against public or proprietary databases). Our verification service providers assess the information you provide and advise ABC whether all or some of that information matches their records and/or information held by the issuer or official record holder for that identity document. These verification service providers are obligated to use your information for identity verification only and must keep your information confidential.
- 9.6. This identity verification process may also involve the use of vetted external organisations which may have their own privacy policies in place. These organisations may record, use and disclose your information in accordance with their own privacy policies and legal obligations.
- 9.7. ABC may also disclose your email address and home address to third parties for the purposes of direct marketing ABC's services including brochures, videos, information about promotions, news and other information about our website, products, services or special promotions.
- 9.8. You will be able to opt-out of direct marketing at any time if you so choose.
- 9.9. Under no circumstances will ABC sell or receive payment for licensing or disclosing your personal information.



- 9.10. Identification Information obtained through the DVS will not be used for creating data profiles or tracking behaviour (online or offline), offering, advertising, or promoting goods or services (for ABC Bullion or others), or market research.

10. Accessing your personal information

- 10.1. You are entitled to access your personal information held by ABC on request. To request access to your personal information please contact our privacy officer (Privacy Officer) using the contact details set out in Clause 10.2.
- 10.2. You also have the right to request the correction of any of your personal information that ABC holds. ABC will take reasonable steps to make appropriate corrections to personal information so that it is accurate, complete and up to date. However, if you consider any personal information we hold about you to be inaccurate, out-of-date, incomplete, irrelevant or misleading, you may request correction of the information by contacting our Privacy Officer using the contact details set out below:

By email: privacy@pallion.com

By mail: ABC Bullion GPO Box 2435 Sydney NSW 2001

- 10.3. We may decline your request to access or correct your personal information in certain circumstances in accordance with the APPs. If we do refuse your request, we will provide you with a reason for our decision and, in the case of a request for correction, we will include a statement with your personal information about the requested correction.

11. Use of your personal information to contact you

- 11.1. We will never knowingly send you unsolicited commercial electronic messages. More information on the *Spam Act 2003* (Cth) is available from the regulator's website: www.acma.gov.au/spam.
- 11.2. We may use information that we know about your likes and interests to tell you about other ABC programs, products and services. We may know about your likes and interests because you have provided that information.

12. Protection of your personal information



- 12.1. ABC has implemented appropriate physical, electronic and managerial security procedures in order to protect personal information from loss, misuse, alteration or destruction. ABC regularly reviews security and encryption technologies and will strive to protect information to the fullest extent possible.
- 12.2. We encourage you to be vigilant about the protection of your own personal information when using third party digital services.

13. Credit card information

- 13.1. 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 the BPOINT facility.
- 13.2. If you use your credit card and the transaction is manual rather than electronic, the imprinted record will be stored by ABC for the period that financial records are required to be retained.

14. Offline Purchases

- 14.1. If you do not wish to place your order on the internet, we offer you the option of phoning or faxing in your order, or you can visit our showrooms during office hours.

15. Making a Complaint

- 15.1. If you have any questions or complaints about this Privacy Policy or the way we handle your personal information, you may contact us at privacy@pallion.com. ABC will first consider your complaint to determine whether there are simple or immediate steps which can be taken to resolve the complaint.
- 15.2. If your complaint requires more detailed consideration or investigation, we will acknowledge receipt of your complaint and endeavour to complete our investigation into your complaint promptly. We may ask you to provide further information about your complaint and the outcome you are seeking.



- 15.3. If you are dissatisfied with ABC's complaint handling process, you may also contact the Office of the Australian Information Commissioner by calling them at 1300 363 992, making a complaint online at www.oaic.gov.au or writing to the Office of the Australian Information Commissioner, GPO Box 5218 Sydney NSW 2001.

16. Privacy and Change of Control

- 16.1. In the event that ABC 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.

17. Linked sites

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

This Privacy Policy was last updated in 09/2026.