

Privacy Policy

1. **Revision history.** Originally issued on 17 June 2026.
2. **Purpose.** This Privacy Policy sets out how we collect, use, store and disclose your personal information in compliance with the Privacy Act 1988 (Cth) (**Privacy Act**).
3. **Who we are.** Verdant Wood Pty Ltd (ACN 698 888 103) (**Verdant Wood**). Any references to 'us', 'we', or 'our' means Verdant Wood. We are a 'small business' under the Australian Privacy Act.
4. **What is personal information?** Personal information includes information or an opinion about an individual that is reasonably identifiable. Examples include your name, age, gender, postcode and contact details. It may also include financial information, including your credit card information.
5. **Your consent.** 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 any other arrangements that apply between us.
6. **Anonymity and pseudonymity.** You are welcome to use a pseudonym when initially interacting with us but you may be asked to verify your identity if the nature of your enquiry or the nature of services requires us to do so.
7. **Notice of the kinds of personal information we collect.** Depending on the nature of our relationship with you, we may collect your:
 - a. name;
 - b. email address;
 - c. number;
 - d. year of birth;
 - e. tax file number;
 - f. credit card information;
 - g. device ID, device type, geo-location data, device and connection data, IP address, statistics on page views, traffic to and from our website, ad data and standard web log data;
 - h. details of the services we have provided to you or that you have enquired about, including any additional information necessary to deliver those services and respond to your enquiries;
 - i. additional information that you provide to us directly or indirectly through your use of our services, social media and apps like Telegram, Signal and WhatsApp
 - j. survey or form-based responses;
 - k. work history and reference checks;
 - l. source of wealth information; or
 - m. other personal information we require to respond to your enquiries, provide services to you, or comply with our legal obligations.
8. **Why do we collect, hold, use and disclose your personal information?** We may collect, hold, use and disclose your personal information for the following primary purposes:
 - a. to enable you to access and use our services and website (if one is made available);
 - b. to operate, protect, improve and optimise our services, business and our users' experience;

- c. to send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you;
- d. to send you marketing and promotional messages and other information that may be of interest to you;
- e. to run rewards, surveys, contests, or other promotional activities or events sponsored or managed by us;
- f. to comply with our legal obligations, resolve any disputes, and enforce our agreements with third parties; and
- g. to consider your employment application or investment enquiry.

9. How we collect your personal information. We may collect personal information directly from you, or from third parties, when you:

- a. interact with our website (if one is made available), services, social media accounts (if any accounts are created), content and advertising;
- b. communicate with us through correspondence, chats, email, or when you share information with us from third party social applications, services or websites;
- c. interact with our website, services, social media accounts, content and advertising;
- d. invest in our business or enquire as to a potential purchase in our business;
- e. when you apply for a job or position with us to assist in our decision on whether or not to make you an offer of employment or engage you under a contract; or
- f. when we believe the personal information is not accurate, up-to-date, relevant and complete.

10. Cookies. In the event we make a website available, we may use 'cookies' or other similar tracking technologies on the website that help us track your usage of the website and remember your preferences. This is data that may include personal information. We will handle any personal information collected by cookies in the same way that we handle all other personal information as described in this Privacy Policy.

What are cookies? Cookies are small files that store information on your computer, TV, mobile phone or other device. They enable the entity that put the cookie on your device to recognise you across different websites, services, devices and/or browsing sessions.

How to stop cookies? You can disable cookies through your internet browser but a website may not work as intended for you if you do so.

11. How we hold your personal information. We may hold your personal information in electronic and/or hard copy form.

12. Security of personal information. We may store your personal information in electronic and/or hard copy form. We cannot guarantee the security of your personal information, especially when transmitted over email or in communication services without encryption. In our processes, selection of software, and third-party IT and security providers, we take reasonable steps to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure.

13. When and how we disclose your personal information. Under this Privacy Policy we may disclose personal information to:

- a. our employees and related bodies corporate;

- b. third party suppliers and service providers (including providers for the operation of our website and/or our business or in connection with providing our services to you);
 - c. professional advisers, dealers and agents;
 - d. payment systems operators (e.g. merchants receiving card payments);
 - e. anyone to whom our assets or businesses (or any part of them) are transferred;
 - f. specific third parties authorised by you to receive information held by us; and/or
 - g. other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.
- 14. Access to and correcting personal information.** Contact us to access or correct your personal information. Sometimes, we may not be able to provide you with access to all of your personal information and, where this is the case, we will tell you why. We may also need to verify your identity when you request your personal information.
- 15. Direct marketing.** We may send you direct marketing communications and information about our services via SMS, mail or other forms of communication, in accordance with the Spam Act and the Privacy Act. At any time you may opt-out of receiving marketing materials from us by contacting us or by using the opt-out facilities provided (eg an unsubscribe link).
- 16. Cross-border disclosure of personal information.** We may disclose personal information outside of Australia to third party suppliers and cloud providers located in the United States of America. We take reasonable steps to ensure that any overseas recipient will deal with such personal information in a way that is consistent with the Australian Privacy Principles.
- 17. Dealing with unsolicited personal information.** Within a reasonable time after receiving unsolicited personal information we will determine whether the information must be destroyed or treated as collected, held and able to be disclosed in accordance with this Privacy Policy.
- 18. What this Policy does not cover.** This Privacy Policy does not apply to acts and practices in relation to employee records of our current and former employees, which are exempt from the Privacy Act. The privacy practices of, or any content on, any linked websites that we have no control over. The privacy policies that apply to those other websites may differ substantially from our Privacy Policy, so we encourage you to read them before using those websites.
- 19. Changes to this Policy.** We may change our Privacy Policy from time to time and share the updated version with you by email and if a website is made available, by publishing changes to the Privacy Policy on our website. We encourage you to read each and any updated version and if a website is made available, to check the website periodically to ensure that you are aware of our current Privacy Policy.
- 20. Making a complaint.** If you think we have breached the Privacy Act, or you wish to make a complaint about the way we have handled your personal information, you can contact us. Please include your name, email address and/or telephone number and clearly describe your complaint. We will acknowledge your complaint and respond to you regarding your complaint within a reasonable time. If you think that we have failed to resolve the complaint satisfactorily, we will provide you with information about the further steps you can take.

21. **Reasons to contact us.** For information about our Privacy Policy or practices, to access or correct your personal information, or to make a complaint.
22. **Our contact details.** By email, to Joni Pirovich, Principal: joni@verdantwood.com.