

PRIVACY POLICY

Our Approach to Privacy

Bell's Edge Pty Ltd ACN 662 873 805 ("**Bell's Edge**") respects your privacy and is committed to treating the personal information we collect in accordance with the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth) ("**Privacy Act**").

This Privacy Policy sets out how we handle your personal information. In this Privacy Policy, "we", "us", and "our" refer to Bell's Edge, and "you" or "your" means a subscriber to a Bell's Edge product or service.

We may collect personal information from you when:

- You create an account on www.bellsedgetrading.com ("**Website**"), and you give your consent to our collection, disclosure and usage of your personal information by clicking on the Consent button at the bottom of this Privacy Policy.
- You use the Website to collect, record, and store your personal information in electronic format for later access, retrieval and use on the Website by you and other persons authorised by you, or you subscribe to our newsletter, such as our newsletters called 'OddsRadar Weekly Open' and 'OddsRadar Daily Report' ("**Purpose**").
- Your information may also be collected through in-Website surveys or other email surveys that you may be asked to complete when you have an account on our Website.

The types of personal information we may collect from you include:

- general identification information such as your name, job title, occupation, and date of birth;
- contact details such as contact phone and mobile number, address, email address, and Internet protocol (IP) address;
- demographic information such as your age, gender, and State or Territory residence;
- your financial or billing information (such as billing address, bank account, and payment information);
- usernames and passwords to the Website;
- If you supply it to us, we may collect certain information about you, including information about your dealings in financial products;
- only where relevant and with your consent, financial information such as credit card and bank account details, shareholdings and details of investments (for example if you own financial derivatives, shares, units, managed funds or other investments, details of dividend payments and distributions from managed funds, any investment gains or losses from the disposal of financial derivatives, shares, units, including associated income and expenditure);
- include technical data about your Website usage, device identifier, and technical data about your personal computer (PC) or computer laptop device mobile phone device ("**Device**"), including the operating system and model.

No location data will be collected and stored at any time.

Why do we collect, use, and disclose your personal information?

Generally we collect your personal information from you directly, for example, when we deal with you over the phone, when you send correspondence or email, when you complete a questionnaire form or survey or when you subscribe to our services.

We may use your information to:

- verify your identity;
- seek your feedback;
- provide to you our products and services for the Purpose;
- communicate with you, and build and maintain our relationship with you;
- for administrative purposes, detecting or preventing fraud, and identifying breaches of our terms of engagement;
- comply with applicable laws and our other regulatory, accounting, reporting or professional obligations;
- protect, exercise or defend our legal rights; and
- process and respond to your requests, enquiries, or complaints.

We may also use your information to perform analytics (on a de-identified basis) to:

- improve our products and services;
- market our products or services to you;
- identify and develop new products and services you may be interested in;
- conduct, monitor and analyse our business and internal operations;
- send you updates, publications, marketing, and new product or service offerings (however, if you do not want to receive marketing emails from us, you can opt-out at any time using the contact details below).

We may disclose your information to:

- our service providers, agents, and contractors from time to time that assist us with providing business processes, products and services;
- your authorised representatives or advisers, and other parties when you ask us to do so when you consent to the disclosure;
- any person you nominate explicitly to share your information;
- specific third parties authorised by you to receive information held by us; and
- other persons, including government agencies, regulatory bodies, and law enforcement agencies, as required or authorised by law; or
- as otherwise required or authorised by law.

Some of these vendors or other parties may receive or store your information in overseas locations. For example, we may disclose your email address or additional contact information to providers of marketing database services, which may store the data in an overseas jurisdiction.

Bell's Edge does not host or store your personal information outside Australia.

How do we store and keep your information secure?

We will hold your personal information in electronic form, encrypted and stored in a cloud-based facility, using infrastructure located in Australia ("**Data Store**"), which has been classified as appropriate for storage of data up to the "protected" security level. All of your data in the storage facility will be removed from the Data Store by you deleting your account by going to Bell's Edge Website -> Settings -> Delete account, or earlier when you make a request by email to support@bellsedge trading.com and provide proof of identity.

We use various physical and electronic security measures to secure your personal information from misuse, interference, loss, or unauthorised use or disclosure. For example, we restrict physical access to our offices, employ firewalls and secure databases, password protect our IT systems, frequently update our anti-virus software, and conduct regular audits and data integrity checks. Our employees, providers, agents and contractors are also bound to keep your personal information secure and treat it as confidential.

We will protect your health information by taking such security safeguards as are reasonable in the circumstances against loss, unauthorised access, use, modification or disclosure, and against all other misuse. However, we cannot guarantee the security of your personal information, including your health information. The Internet is not a secure environment. If you use the Internet to send us any information, including your email address, please be aware that it will be posted at your own risk.

Accessing or correcting your personal information

You have rights under the Privacy Act to:

- request access to the personal information we hold about you;
- ask us to update or correct any information that is inaccurate, misleading, incomplete or outdated; and
- opt-out of receiving direct marketing communications from us.

You can also ask us to remove any information irrelevant to the Purpose.

You can do any of these things by contacting our Support Team using the contact details below.

If you request access to your personal information or ask us to correct or update information about you, we may need to verify your identity. In some circumstances, we may have a valid reason to deny your request to access or correct your information. If we do this, we will tell you why.

Making a complaint

You can notify us of any complaint about how we have handled your personal information by contacting us using the details below. Please include your name, email address, or telephone number and clearly describe your complaint.

Bell's Edge's Support Team will investigate any complaint and communicate the outcome of that investigation to you. (Please allow at least 14 days for us to do so).

While we hope that we will be able to resolve any complaints that you may have without involving third parties, if you are not satisfied with the outcome of our internal investigation, you may lodge a

complaint with the Office of the Australian Information Commissioner (OAIC) at enquiries@oaic.gov.au or 1300 363 992. More information is available on the OAIC's website at <https://www.oaic.gov.au/>.

Contact us

If you have any questions about this Privacy Policy or how we manage your personal information, please contact:

Bell's Edge Support Team

support@bellsedgetrading.com

{CONSENT BUTTON}

- ✓ I have read and understood the Bell's Edge Privacy Policy;
- ✓ I consent to Bell's Edge collecting my personal information and xxx information and the usage and disclosure of my information per the Bell's Edge Privacy Policy.