



Privacy Policy



INFINITE ZEPHYR

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Version: August 2025

The below document states how Infinite Zephyr Ltd ABN 12 628 624 279 (us, we or our) collects, protects, uses, and shares your personal information.

Privacy commitment

Your privacy is important to us. We are committed to protecting your privacy and we want to ensure that you have a clear understanding about the information we collect about you, how we use it, and who we share it with. We provide a number of products and services that require us to collect, store, share, and use your personal information. This Privacy Policy applies when you use our products or services or interact with our website. It sets out how we collect information about you, how we use it, and how we keep it secure.

This Privacy Policy also includes our Credit Reporting Policy, which explains how we handle any credit information we collect.

We may update this Privacy Policy from time to time by publishing the changes on our website. We encourage you to check our website regularly to stay informed about any updates.

What information do we collect?

Personal information refers to details about you that can reasonably identify you—such as your name, email address, and contact details.

Credit information is personal information collected in relation to a credit application. This may include identification details, default information, or repayment history.

In this Privacy Policy, the term *personal information* includes both personal information and credit information.

The information we may collect (and hold) about you includes:

- name, address, email address, date of birth, phone number(s);
- tax file number;
- information about dependents or family members;
- bank account details or credit or debit card details;
- Medicare number, pension card number;
- accounting and financial information;
- occupation, employment history and details;
- family commitments and social security eligibility;
- financial needs and objectives;
- assets and liabilities (current and future), income, expenses;
- superannuation and insurance details;
- risk profile details;
- details of your interactions with us;
- any other relevant information that you give to us for the purpose of providing you with our products or services.

We collect personal information either directly from you or from other people such as:

- related entities;
- suppliers and service providers in connection with providing our products and services;
- your advisers;
- banks, financial institutions, and other financial product providers;
- your employer;
- credit reporting bodies;
- fund managers;
- superannuation funds;
- public sources.

We collect information when you:

- visit our website;
- submit an application with us;

- participate in a meeting with us (in person, via video, or by phone);
- communicate with us by email or other correspondence methods.

Why we collect, hold, use, and disclose personal information

We will use your personal information only for the purpose for which it was collected (*primary purpose*), for a related purpose that you would reasonably expect, or for any other purpose with your consent.

Our primary purposes for collecting, holding, using, and disclosing your personal information include:

- Providing our products, services, and customer support
- Sending you information about events, products, services, and opportunities that may be of interest to you
- Conducting market research, including seeking your feedback on our products or services
- Operating and improving our website, including enhancing your user experience
- Identifying, managing, and minimising risks to our products or services
- Detecting and preventing suspicious or fraudulent activity
- Monitoring compliance with our terms and conditions
- Providing information to our advisers, such as lawyers and accountants, to assist with legal, accounting, or security compliance
- Protecting our legal rights and interests, as well as those of others, including in relation to legal claims, compliance, regulatory and audit requirements, and data security
- Verifying your identity in accordance with the Anti-Money Laundering and Counter-Terrorism Financing Act (AML Act)
- Meeting our legal obligations, resolving disputes with customers, and enforcing agreements with third parties
- Any other purpose related to the purposes outlined above

Do we use your personal information for direct marketing?

No. We do not use your personal information for direct marketing purposes.

Sharing (disclosing) your information

We may share your personal information with:

- Our related entities
- Suppliers and service providers involved in delivering our products and services
- Payment system operators
- Banks and other financial institutions
- Fund managers
- Superannuation funds
- Financial product issuers
- Any purchaser of our business
- Individuals you have authorised to receive your information
- Government agencies, regulatory bodies, and law enforcement agencies, or as required, authorised or permitted by law.

Information that we provide to other people will be handled in accordance with their privacy policy

Sharing (disclosing) your information outside Australia

We do not share (disclose) your personal information outside of Australia

Using our website and cookies

We collect personal information when you use or access our website.

Although we do not use browsing data to personally identify you, we may record certain details about your visit—such as the pages you view, the date and time of access, and the internet protocol (IP) address assigned to your device.

We may use cookies and similar tracking technologies on our website to monitor usage and remember your preferences. Cookies are small files stored on your computer, mobile phone, TV, or other device. They allow the party placing the cookie to recognise you across different websites, services, devices, and browsing sessions. You can disable cookies through your internet browser settings; however, doing so may affect the functionality of our website and some features may not work as intended.

Links

Our website may contain links to websites operated by third parties. These links are provided for your convenience and may not always be current or maintained.

We are not responsible for the privacy practices or content of any linked websites, and we have no control over or rights in those sites. The privacy policies of those websites may differ significantly from ours, so we encourage you to read them carefully before using those websites.

How we hold your information to keep it safe

We store your personal information in both electronic and hard copy formats.

We take reasonable steps to safeguard it from misuse, interference, loss, unauthorised access, modification, or disclosure. To protect your information, we use a combination of physical, administrative, personnel, and technical security measures.

We:

- Impose confidentiality obligations on our employees and provide training on how to keep your information secure
- Maintain policies and procedures for document storage and system access security
- Use firewalls and virus scanning tools to prevent unauthorised access and protect against malicious software
- Destroy or de-identify data once it is no longer required

While we take these measures seriously, we cannot guarantee the absolute security of your information.

Rights to access your information or seek correction

You can request access to the personal information we hold about you by contacting us using the details provided below. In some cases, we may be unable to give you full access, and if so, we will explain the reason. We may also need to verify your identity before processing your request.

If you believe that any of the information we hold about you is inaccurate, please contact

us, and we will take reasonable steps to correct it.

Right to remain anonymous

You may choose not to provide us with personal information; however, this may mean we are unable to offer you certain products or services.

Do we disclose credit information to credit reporting bodies (CRB)?

Electronic Identification

We are required to verify your identity under the AML Act before providing you with our services. In order to verify your identity electronically, we will ask you for the following personal information:

- name;
- address;
- date of birth; and
- details of and in some cases copies of your identification documents.

You acknowledge that your personal information may be disclosed to external organisations, including government agencies and credit reporting bodies (CRBs). It may also be shared with our agents who assist in the electronic identity verification process.

Using your personal information for electronic identity verification does not constitute a credit check and will not affect your credit standing in any way. A credit reporting body (CRB) may advise us whether the personal

information you provide fully or partially matches the details in its credit information files.

Your details may also be submitted to the Australian Government's Document Verification Service (DVS), a national online system that enables organisations to verify an individual's identifying information against official government records. More information about the DVS is available on its website.

Other methods of verification

You do not have to agree to electronic verification. Please just let us know you prefer to have your identity to be verified in person.

How to complain

If you believe we have breached the *Privacy Act* or wish to make a complaint about how we have handled your personal information, please contact us using the details below. Include your name, email address, and/or telephone number, along with a clear description of your complaint.

We will acknowledge your complaint and respond within a reasonable timeframe.

If you are not satisfied with our response to your complaint, you may contact the Office of the Australian Information Commissioner (OAIC) using the following details:

GPO Box 5218 Sydney NSW 2001

Phone: 1300 363 992

Website: www.oaic.gov.au