Million Circles

Document storage and security policies and practices

Your personal information is generally held in client files created by us in respect of your instructions. Information may also be held in our computer database. We will at all times seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure. At all times, your personal information is and will be treated as confidential.

In the event that you cease to be a client to the firm, any personal information we hold about you will be maintained for a period of 7 years in order to comply with legislative and professional requirements. This information may be held either at our office or an off-site secure storage facility. At the expiration of 7 years, your personal information will be destroyed.

Access to your information

We undertake to provide you with access to your information provided that your request is reasonable, and provided we are not precluded from doing so by any law or proceedings. Access will generally be by written copy of the information requested, allowing you to inspect the information or providing you with an accurate summary of the information held.

We will endeavour to respond to any request for access to information within 14 to 30 days, depending on the complexity of the information and/or the request. If your request is urgent, please indicate this clearly.

Correction to your personal information

We will endeavour to ensure that the personal information about you which we hold is up-to-date and accurate. In the event that you become aware or believe that any personal information that we hold about you is inaccurate or outdated, please contact us. We will respond to any request to update personal information promptly.

Making a privacy complaint

If you wish to complain about any breach or potential breach of this Privacy Policy, you should contact us by any of the methods detailed below and request that your complaint be directed to The Compliance Coordinator. Your complaint will be considered and responded to within 7 days. It is our intention to use our best endeavours to resolve any complaint to your satisfaction, however, if you are unhappy with our response you are entitled to contact the office of the Privacy Commissioner who may investigate your complaint further.

Contact details

If you have any queries about this Privacy Policy, you should contact The Compliance Coordinator at Million Circles, phil@millioncircles.com

Million Circles

Respect of privacy

We treat your privacy seriously. This document details our policy on collecting, managing and securing information. If you have any questions relating to this document, please contact us.

Confidential

All personal information is treated as strictly confidential. It will never be sold or otherwise transferred to a 3rd party, without your express permission.

Collection of information

This section details what information Million Circles collects, why it is collected and how that information may be used.

In order to utilise some aspects of this website, Million Circles may require you to provide a certain amount of information. This includes information required to create an ID (such as your name and email address) and preference information (likes/dislikes). We use this information to provide you with a service or a better online experience.

In a data entry area, we may request some optional "demographic" information. We use aggregates of this information (e.g. average age) to understand our audience. From time to time, Million Circles may report aggregate information to other parties. No personal or other information that may be used to identify you is included in this disclosure.

In order to better understand how our customers' use this site, we collect and analyse some aggregate information about our site users. This includes such things as what time of day they visit the site, what browser they use and what pages they visit. No personal or other information that may be used to identify you is included in this analysis.

Million Circles logs all activity and maintains audit trails of usage of this site. We use this information in the detection and prevention of fraud and other malicious activities.

Email

Million Circles does not send "spam" unsolicited emails.

Before any email is collected for use by Million Circles, permission will be requested from you. After obtaining authorisation we will use email messages to provide you with information, requested services or latest news items.

We may contact you on behalf of a third party. We will only do this if we are satisfied that the third party has your consent to do so.

We may also contact you to ask your opinion on our website features or processes, or if we have specific questions relating to your account or usage of the site.

Cookies

This site does NOT use "cookies". A cookie is a small piece of information stored on your computer that is sent to the site each time you request a page. Cookies are used to help deliver a more functional and intelligent site to you.

No username, password or personal information is ever stored in a cookie.

Links

Million Circles may contain links to other Web sites. Please note that when you click on one of these links, you are entering another site. We encourage you to read the privacy statements of these linked sites as their privacy policy may differ from ours.

Disclaimer

- 1. If you access the Million Circles website you agree to be bound by the conditions contained in this legal message and further agree that the Courts of Australia shall have exclusive jurisdiction in respect of any dispute arising from this legal message.
- 2. Million Circles assumes no responsibility for the contents of any other web sites to which the Million Circles web site has links.

- 3. To the extent permitted by law Million Circles shall not be liable to any person for any loss or damage which may arise from the use of any of the information contained in this web site.
- 4. The material contained in this web site is a guide only, is not intended as a recommendation to buy, sell or hold any securities of Million Circles, and does not constitute an offer to sell or the solicitation of an offer to buy any such securities. The price of shares and the income from them can go down as well as up. If you are not sure what you should do, please consult your financial adviser.
- 5. While Million Circles has taken every effort to ensure that the information contained within the web site is correct, you should be aware that the information may be incomplete, inaccurate or may have become out of date.