



Privacy Statement

INDUS AU PTY LIMITED
ABN 78 682 656 873

AUTHORISED REPRESENTATIVE OF AUSTRALIAN
FINANCIAL SERVICES LICENCE NO. 337927

WWW.INVESTINDUS.COM/AU

SUITE 4.03, LEVEL 4, 56 CLARENCE STREET,
SYDNEY NSW 2000, AUSTRALIA.

About this Privacy Statement

At Indus, we take your privacy seriously and are committed to protecting your personal information. This Privacy Statement explains how Indus AU Pty Limited (ABN 78 682 656 873), together with its related entities (collectively, the Indus group, “Indus”, “we”, “us”, “our”), collects, uses, discloses, stores, and protects your personal information. It also outlines your rights and how to contact us about privacy matters.

When we refer to “your information” in this Statement, we mean personal information as defined in the Privacy Act 1988 (Cth). Any personal information you provide will be collected and handled in accordance with this Statement and our obligations under the Privacy Act 1988 (Cth).

We may update this Statement without notice, so please review it periodically for any changes. The latest version is always available on our website.

This Statement should be read alongside our [Collection Notice](#).

Collection, use, and sharing

We usually collect personal information directly from you. At times, we may also collect it from third parties such as identity verification providers, payment processors, and marketing service providers.

Some information is required by law, including to meet anti-money laundering and counter-terrorism financing obligations. Other information is needed so we can deliver our products and services. You do not have to provide everything we request, but if you withhold information we need, we may be unable to provide services. In some cases we may need to suspend or close your account to comply with legal requirements, and we will try to contact you before doing so.

We collect your information when you:

- Sign up to the Indus platform.
- Place buy or sell orders for investments.
- Visit our website or use our app.
- Top up an Indus account.
- Sign up to receive educational content.
- Join Beta Club or a feature or product waitlist.
- Take part in activities we offer such as competitions or surveys.
- Contact us to make an enquiry, provide feedback, or make a complaint.
- Otherwise provide information to us.

The personal information we collect depends on the services or features you use and may include:

PERSONAL DETAILS AND CONTACT INFORMATION

The types of personal information that may be involved include:

- Name.
- Residential and/or postal address.
- Email address.
- Phone number.
- Images of your face and ID.
- Date of birth.

GOVERNMENT IDENTIFIERS AND IDENTITY DOCUMENTS

The types of personal information that may be involved include:

- Tax File Number and country of tax residency.
- Security holder Reference Number (SRN) or Holder Identification Number (HIN).
- Medicare card, passports, driver licence or pension card copies and information.
- Birth, death, citizenship and marriage certificates.

FOREIGN GOVERNMENT IDENTIFIERS AND IDENTITY DOCUMENTS

The types of personal information that may be involved include:

- Foreign passport/s and drivers licence.
- Tax identification numbers and country of tax residency.

FINANCIAL INFORMATION

The types of personal information that may be involved include:

- Bank account numbers.
- Credit card numbers.
- Financial and investment holdings and trade history.
- Copies of bank statements or utilities bills (proof of address).
- Nature and purpose of your investing.
- Source of funds.

TRANSACTION INFORMATION

The types of personal information that may be involved include:

- Information about activity on your Indus account, including buys, sells, top-ups, and logins.

INTERACTION INFORMATION

The types of personal information that may be involved include:

- Records of your interactions with us, including enquiries, feedback, complaints, and phone calls.
- Call recordings, where applicable. We will let you know if a call is being recorded.

DIGITAL INFORMATION

The types of personal information that may be involved include:

- IP addresses.
- Device and browser identifiers.
- Geo-location.
- Types of authentication used (example touch or face ID).

SOCIO-DEMOGRAPHIC INFORMATION

The types of personal information that may be involved include:

- Marital status
- Age.
- Gender.
- Number of dependents.

- Occupation.
- Nationality.

For example, when we conduct customer surveys.

BEHAVIOURAL INFORMATION

This includes information we generate about how you use Indus, such as habitual investing with regular contributions of similar amounts, in-app search terms, or less frequent lump-sum investments.

INFORMATION YOU PROVIDE TO US

The types of personal information that may be involved include:

- Enquiries and correspondence with us.
- Responses to customer surveys.
- Sign-ups to mailing lists or waitlists.
- Entries in competitions.

SENSITIVE INFORMATION

We may collect and handle certain sensitive information, such as:

- Information about your race or ethnicity, for example if you communicate with us or provide documents in another language.
- Criminal history and political exposure, where required to meet legal or regulatory obligations.
- Biometric identifiers (for example, facial images or fingerprints) used for identity verification.

INFORMATION REGARDING YOUR PERSONAL CIRCUMSTANCES

To support you during our interactions, we may ask for information about your personal circumstances, including significant life events, details of injury or illness, gambling or addiction, and unexpected changes to your financial situation.

INFORMATION THAT IS PUBLICLY AVAILABLE

At times, we may collect and handle information that is publicly available, such as information from:

- Websites and social media platforms, including Facebook, Twitter, YouTube, TikTok, and Instagram.
- Public registers.
- Podcast and webinar platforms.

We may use cookies and similar technologies to remember your preferences and settings, strengthen security, analyse traffic, and measure the effectiveness and popularity of product features and marketing. This technology links to your device rather than directly identifying you. We may combine this information with other data we collect about you to provide analytics.

How Do We Use Your Information?

We use your information to provide our services. How we use or disclose it depends on the purpose for which it was collected, and may include:

PROVIDING AND PERSONALISING THE DELIVERY OF OUR SERVICES

We use your personal information to:

- Provide our products and services.
- Set up and maintain your account.
- Process trades, top-ups, withdrawals, and payments.
- Apply and manage fees and charges.
- Communicate with you, deliver support, and manage our relationship.
- Enable your access to our website and app.
- Provide legal notices.
- Notify you about account activity and eligible investment opportunities, such as rights offers.
- Collect and recover money owed to us.
- Respond to complaints.
- Maintain our security holder records.
- Carry out any other purpose you have consented to, or that is necessary to provide our products and services to you.

IMPROVING INDUS

We use your personal information to:

- Review customer feedback.
- Test, validate, and research products, services, and systems.
- Perform quality assurance on our interactions with you, including online chat and complaint handling.
- Protect and optimise our website, products and services, user experience, and business.

- Resolve operational issues and address or escalate customer concerns.
- Detect and prevent fraud or crime.

CREATING MARKET DATA AND BEHAVIOURAL ANALYTICS

We may use de-identified customer records to:

- Report on market trends and our investor base.
- Improve our products and services.
- Develop offerings that better meet customer needs and preferences.
- Understand and manage our risks.

MARKETING

We may use your personal information to send marketing or promotional messages about our products and services, as well as selected third-party offerings we believe may interest you. You can opt out at any time by using the unsubscribe function.

MANAGING OUR BUSINESS

We may use your information to help us run our business, including managing our financial position and capital needs, building capability and conducting testing, managing communications, and completing audits.

MANAGING OUR SECURITY, RISK, AND CRIME PREVENTION

We may use your information to:

- Prevent, detect, and investigate suspicious or fraudulent activity.
- Strengthen our systems to guard against cyber attacks, unauthorised access, and other criminal or malicious activity.

COMPLYING WITH OUR LEGAL OBLIGATIONS

We use your personal information to:

- Verify your identity and address.
- Monitor account activity and notify the relevant authorities of potential criminal activity, including fraud, terrorist financing, and money laundering.
- Share information when required by law, including with regulators, law enforcement, or tax authorities.
- Fulfill any other purpose required or permitted by law or court order.

DE-IDENTIFYING INFORMATION

At times we de-identify your personal information and use it to produce insights and analytics. We may share this de-identified information with businesses and government agencies to help them understand general customer trends and improve the delivery of products and services.

Who We Share Your Information With

We may disclose your information to third parties for the purposes described above, or as required or permitted by law. These third parties may include:

OTHER MEMBERS OF THE INDUS GROUP

We may share your information between members of the Indus Group in connection with any purpose set out in this Statement.

The Indus Group is comprised of the various entities ultimately owned by Indus Limited (NZ) (NZBN 9429051833640), who support us with providing our products and services.

OUR SUPPLIERS OR SERVICE PROVIDERS

To provide our products and services, and to use your information for the purposes described in this Statement, we may work with third parties, including some located outside Australia. These may include:

- Stock exchanges and share registry providers.
- Biometric technology providers.
- Financial institutions and banks.
- Identity verification databases.
- Investment providers.
- In-app messaging providers.
- Card payment processors.
- Business strategy advisers.
- Data analytics and research partners.
- Mail-out and marketing providers.
- Cloud storage and data warehouse providers.
- Our advisers, consultants, auditors, and business partners.
- We may share your personal information with Sanlam Private Wealth Pty Ltd (AFSL No. 337927), our licence holder, where required for regulatory, compliance, supervision, or service delivery purposes.

REGULATORS AND LAW ENFORCEMENT AGENCIES

- Australian Transaction Reports and Analysis Centre (AUSTRAC).
- Australian Securities and Investments Commission (ASIC).
- Australian Federal Police.
- Any other domestic or international regulator where disclosure is required or permitted by law.

AUTHORISED THIRD PARTIES

- Your power of attorney.
- The executor or administrator of your estate.
- Your attorney or legal representative.
- Your legal guardian

Sending Information Overseas

Some of the organisations we share information with are located overseas. This includes Indus Group members in New Zealand and third parties that operate or store data outside Australia, including in New Zealand and India. We may transfer information overseas to complete international transactions, provide our products and services, or comply with laws and assist government agencies and law enforcement.

When we send your information overseas, we put appropriate privacy and data handling arrangements in place to protect it.

We may also share your information if we sell or merge some or all of our business or assets with another company.

We may use and share information that does not identify you for any purpose.

Storing Your Information

We take reasonable steps to protect your information from misuse, interference, and loss, and from unauthorised access, modification, or disclosure. We store information in electronic and hard copy form on secure systems and within secure facilities. Your information is encrypted in transit and at rest using industry-standard encryption. We also use hashing, masking, and tokenisation to avoid unnecessary display of personal information.

Our in-house security team maintains and continually improves our security posture. Staff receive information security training, and access to your information is restricted to authorised people and systems. We conduct regular penetration tests, audits, and security reviews by independent specialists, and we design for resilience with backups and recovery plans.

Despite these measures, we cannot guarantee the security of information during transmission or storage.

RETAINING AND DELETING YOUR INFORMATION

We may retain your information for as long as you have an account and for at least seven years after it is closed to meet regulatory, tax, insurance, and other obligations. After that, we may keep it for as long as necessary for the purposes set out in this Statement. For example, we may retain information indefinitely where we consider it necessary for fraud prevention.

Accessing Your Information

Most of your information can be accessed through your account. You can ask us to correct any inaccurate information by using the contact details in this Statement or by contacting us through the app. If we do not think a correction is required, we will explain why.

We will take reasonable steps, consistent with our obligations under the Privacy Act, to correct or update information.

REQUESTING ACCESS TO SPECIFIC INFORMATION

If the information you need is not available through your account, you can request specific details by contacting us using the details in this Statement or through the app. We may charge an administration fee to cover the time spent gathering the information. We will tell you the likely fee before we proceed.

We aim to provide the requested information within 30 days. If we need more time, we will let you know and explain why.

In some cases, we may not be able to share certain information with you or destroy information you ask us to delete because of legal requirements.

When we send your information overseas, we put appropriate privacy and data handling arrangements in place to protect it.

We may also share your information if we sell or merge some or all of our business or assets with another company.

We may use and share information that does not identify you for any purpose.

Contact Us

If you have questions about our Privacy Statement, or if you wish to access or amend your information, please contact us at:

Email: support@indus.au

If you believe we have not met our obligations under the Privacy Act, please contact us at the email above.

We value your feedback and appreciate being told when you have a complaint. If you have a complaint, contact us and we will review it and try to resolve the issue.

You can reach us via the "Contact Us" button in the Indus app, or through one of the channels below.

Email: support@indus.au

Phone: **1800 680 099**

As we operate in the financial services industry, you can contact the Compliance Manager at Sanlam Private Wealth Pty Ltd on:

Email: compliance@privatewealth.sanlam.com.au

Phone: **(03) 8640 5508**

If we are unable to resolve your complaint to your satisfaction, you may contact the Australian Financial Complaints Authority (AFCA), our external dispute resolution scheme, quoting Sanlam's Member Number 14570.

AFCA provides fair, free, and independent resolution of financial complaints. The contact details for AFCA are:

Website: www.afca.org.au

Email: info@afca.org.au

Phone: **1800 931 678** (toll-free)

Mail: Australian Financial Complaints Authority,
GPO Box 3, Melbourne VIC 3001.

For more information about your privacy rights,
our obligations, and how to make a privacy
complaint, visit the Office of the Australian
Information Commissioner at:

Website: www.oaic.gov.au

Phone: 1300 363 992

Email: enquiries@oaic.gov.au

Mail: GPO Box 5218, Sydney

