



Halal Money  
by HEJAZ

# Halal Money App Privacy Policy

Version 1.1 – April 2024





## 1. Introduction

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HEJAZ ISLAMIC CREDIT SOLUTIONS PTY LTD ACN 603 474 899 (referred to as **Halal Money, we, our, us**) manages the personal information collected through the Halal Money App (**App**). We endeavour at all times to comply with the *Privacy Act 1988 (Privacy Act)*, including the Australian Privacy Principles, and recognise the importance of ensuring the confidentiality and security of your personal information. All third parties (including clients, suppliers, sub-contractors, or agents) that have access to or use the App, deal with us or from whom we collect personal information must abide by this Privacy Policy. Halal Money makes this Privacy Policy available free of charge and can be accessed from the website ([www.halalmoney.com.au](http://www.halalmoney.com.au)) or through the App.

In this Privacy Policy:

- **Disclosure** of information means providing personal information to persons outside of Halal Money;
- **Personal information** means information or an opinion about an identifiable individual, or an individual who is reasonably identifiable:
  - a. Whether the information or opinion is true or not; and
  - b. Whether the information or opinion is recorded in a material form or not.
- **Privacy Officer** means the contact person within Halal Money for questions or complaints regarding Halal Money's handling of personal information;
- **Sensitive information** is a subset of personal information that includes information relating to a person's racial or ethnic origin, political opinions, religious beliefs or affiliations, membership of a political association, trade union or other professional or trade association, sexual orientation or practices, or criminal record, health or genetic information and some aspect of biometric information; and
- **Use** of information means use of personal information collected or held by Halal Money.

## 2. What kind of Personal Information do We Collect and Hold?

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We will only collect personal information which is necessary for the purposes of carrying out our functions and activities as the issuer of the App and to be able to provide you with our services. The personal information we collect may include:

- Name;
- Date of birth;
- Address;
- Phone number;
- Email address;
- Location information;
- Internet protocol address;
- Information regarding your interaction with the App and the services / products available through the App;
- Occupation;
- Bank account details or debit card details;
- Driver's license, passport, medicare details;
- Financial information, including details of:
  - a. Your investments;
  - b. Your insurance policies;
  - c. Estate planning strategies;
  - d. Taxation information; and
  - e. Health information;
- Other information relevant to the purpose of providing you with our services, such as family and living circumstances, education qualifications, employment history, financial information including income, tenancy details, rental history and tenancy reference checks, interests, feedback preferences, usernames and passwords, guardianship and service feedback and complaint details; and / or.
- Sensitive information about you that may include your gender, health, disability, mental health, racial or ethnic origin, criminal convictions, religious affiliation, and other particulars required as part of our regulatory obligations and/or that are relevant for the proper provision of the services that we provide.



### 3. How do We Collect Personal Information?

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We generally collect personal information directly from you. For example, personal information will be collected through our application processes, forms and other interactions with you in the course of providing you with our products and services, including when you visit our website, use our App, call us, participate in an online chat, or send us correspondence.

We may also collect personal information about you from a third party, such as electronic verification services, referrers, and marketing agencies. If so, we will take reasonable steps to ensure that you are made aware of this Privacy Policy. We may also use third parties to analyse traffic at our website, which may involve the use of cookies. Information collected through such analysis is anonymous.

We will not collect sensitive information about you without your consent unless an exemption in the Privacy Act applies. These exceptions include if the collection is required or authorised by law, or is necessary to take appropriate action in relation to suspected unlawful activity or serious misconduct.

If the personal information we request is not provided by you, we may not be able to provide you with the benefit of our services or meet your needs appropriately.

Due to the nature of the financial products and services accessible through use of the App, we do not provide the option of anonymity or using a pseudonym to access the products and services available on the App. This is because Halal Money is required to provide financial services to individuals who have identified themselves.

### 4. Unsolicited Personal Information

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We may receive unsolicited personal information about you. Subject to law, we destroy or de-identify all unsolicited personal information we receive unless it is reasonably necessary for us to provide our functions or activities in connection to the App or the underlying financial products and services. We may retain additional information we receive about you if it is combined with other information we are required or entitled to collect. If we do this, we will hold the information in the same way we hold your other personal information.

#### **Who do we collect personal information about?**

The personal information we may collect and hold in connection with the App or the underlying products accessible via the App includes (but is not limited to) personal information from:

- Clients;
- Potential clients;
- Service providers or suppliers;
- Prospective employees, employees and contractors; and
- Other third parties with whom we come into contact.

### 5. Website Collection and Cookies

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We collect personal information when we receive completed online generated forms from our App and website. We may also use third parties to analyse traffic at that website, which may involve the use of cookies. Information collected through such analysis is anonymous.

To use our website and the App, you must consent to our use of cookies. You can modify your consent to our use of cookies at any time. If you no longer wish to receive cookies, you can use your web browser settings to accept, refuse and delete cookies. To do this, follow the instructions provided



by your browser. Please note that if you set your browser to refuse cookies, you may not be able to use all the features of our website.

Cookies are small text files which are transferred to and stored on your device's web browser, which enables our website to track your activity on the website, recognise your browser and capture and remember certain information. Cookies do not contain personal information in themselves but can be used to identify a person when combined with other information.

We will delete all personal information obtained through cookies in accordance with the Privacy Act.

The App collects device information to remember your login details. To delete your device information, you will need to delete or uninstall the App from your device. The App does not independently store personal information, however some personal information may be stored on underlying third party platforms.

We also use data analytics on the App and website for the purposes of data research. The data we collect may be combined with other information which may be identifiable to you.

## 6. How do We Collect Personal Information?

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We may use and disclose personal information we collect about you for purposes which include the following:

- Provide you with our products and services offered on the App;
- Establishing and verifying identity;
- Facilitating you to access your transaction account with Hejaz and use the functions of the App;
- Provide you with services to purchase interests in exchange traded funds;
- Review and meet your ongoing needs;
- Provide you with information we believe may be relevant or of interest to you;

- Let you know about other products or services we offer, send you information about special offers or invite you to events;
- Consider any concerns or complaints you may have;
- Comply with relevant laws, regulations and other legal obligations;
- Help us improve the products and services offered to our customers and enhance our overall business;
- Using de-identified information for the purposes of data research and reporting.

We may use and disclose your personal information for the purpose for which it was provided, or for secondary purposes which are related to the primary purposes (including as set out above), or in other circumstances otherwise authorised by the Privacy Act.

Sensitive information will be used and disclosed only for the purpose for which it was provided (or a directly related secondary purpose), unless you agree otherwise, or an exemption in the Privacy Act applies.

## 7. Who Might We Disclose Personal Information to?

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We may disclose personal information to organisations that help us to provide you with the App and / or the underlying products on the App, including to:

- A related body corporate or related entity of Halal Money;
- Third party service providers such as our lawyers, accountants, debt collectors or other advisers;
- Platform service providers, including Hay as a Service ABN 75 645 062 611 trading as Shaype;
- Payment systems operators;
- Banks or other financial institutions;
- Organisations involved in a transfer or sale of all or part of our assets or business;
- Regulatory bodies, government agencies, law enforcement bodies and courts;
- External dispute organisations;



- Financial product issuers and custodians, including Hay Limited ABN 34 629 037 403 and Openmarkets Australia Ltd ABN 38 090 472 012; and
- Anyone else to whom you authorise us to disclose it to or as required by law.

If we disclose your personal information to service providers that perform business activities for us, they may only use your personal information for the specific purpose for which we supply it. We will endeavour to ensure that all contractual arrangements with third parties adequately address privacy issues, and we will make third parties aware of this Privacy Policy.

## 8. Sending Information Overseas

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We may disclose personal information outside of Australia to our service providers, including to persons in our office in Indonesia, who provide risk assessment and transaction monitoring (PEP's and sanctions checking). We will 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.

## 9. Management of Personal Information

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We recognise the importance of securing the personal information of our customers, and are committed to keeping your personal information secure. We will take all reasonable steps to ensure your personal information is protected from misuse, interference or loss, and unauthorised access, modification or disclosure (except as otherwise set out in this Privacy Policy).

Your personal information is generally stored in our computer database. Any paper files are stored in secure areas. In relation to information that is held on our computer database, we apply the following guidelines:

- Passwords are required to access the system, and passwords are routinely checked;
- Data ownership is clearly defined;
- We change employees' access capabilities when they are assigned to a new position;
- Employees have restricted access to certain sections of the system;
- The system automatically logs and reviews all unauthorised access attempts;
- Unauthorised employees are barred from updating and editing personal information;
- All computers which contain personal information are secured both physically and electronically; and
- Data is encrypted during transmission over the network;

Personal information is treated as confidential information and sensitive information is treated as highly confidential.

The period of time we keep your information will depend on the type of information we hold about you and whether we need the information for any purpose. If we hold personal information which is no longer needed or required to be retained at law, we will take reasonable steps to destroy the information or ensure the information is de-identified.

## 10. Direct Marketing

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From time to time, we may use or disclose your Personal Information for the purposes of direct marketing and this will be done in accordance with applicable laws. You may opt-out from receiving direct marketing communications at any time by contacting us with such request. We will endeavour to meet your request within a reasonable time, and generally within 30 days.





## 11. Identifiers

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We do not adopt identifiers assigned by the Government (such as drivers' licence numbers) for our own file recording purposes, unless one of the exemptions in the Privacy Act applies.

## 12. How do We keep Personal Information Accurate and up-to-date?

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We are committed to ensuring that the personal information we collect, use and disclose is relevant, accurate, complete and up-to-date. You have a right to request to have your personal information corrected and we encourage you to contact us to update any personal information we hold about you. To submit a request, please contact us using the details in section 16 of this Privacy Policy. We aim to complete correction requests within 30 days of receipt of the request. There may be circumstances where a correction is not possible, and this will be communicated to you in writing.

If we correct information that has previously been disclosed to another entity, we will notify the other entity within a reasonable period of the correction, usually within 30 days. We do not charge you for correcting the information.

## 13. Links

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Our App and website may contain links to websites operated by third parties. Those links are provided for convenience and may not remain current or be maintained. Unless expressly stated otherwise, we are not responsible for the privacy practices of, or any content on, those linked websites, and have no control over or rights in those linked websites. The privacy policies that apply to those other websites may differ substantially from our Privacy Policy, so we encourage individuals to read them before using those websites.

## 14. Accessing your Personal Information

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Subject to the exceptions set out in the Privacy Act, you may gain access to the personal information that we hold about you by contacting the Privacy Officer. We aim to provide you with access to your personal information within 30 days of your request. If we refuse to provide the information, we will provide reasons for the refusal.

We will require identity verification and specification of what information is required. An administrative fee for search and photocopying costs may be charged for providing access.

## 15. Updates to this Privacy Policy

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This Privacy Policy will be reviewed from time to time to take account of new laws and technology, and changes to our operations and the business environment. We will endeavour to notify you of any such changes by way of updating the Privacy Policy on our website.





## 16. Incidents/Complaints handling/ Making a Complaint

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We have an effective complaint handling process in place to manage privacy risks and issues.

If you are concerned in any way of how we (including any of our employees, contractors or agents) manage and maintain your personal information, you can contact our Privacy Officer and discuss your concerns or lodge a complaint. We will register your complaint and will address the concerns as early as possible and within 30 days. If we cannot fully respond in that time, we will seek to keep you informed about the progress of your complaint.

Should you have any questions about this Privacy Policy, or wish to make a complaint about how we have handled your personal information, you can lodge a complaint with us by:

Telephone	1300 043 529
Mail	PO Box 96, Flinders Lane VIC 8009
Email	operations@halalmoney.com.au

If you are not satisfied with our response to your complaint, you can also refer your complaint to the Office of the Australian Information Commissioner by:

Telephone	1300 363 992
Email	enquiries@oaic.gov.au
Mail	Director of Complaints, Office of the Australian Information Commissioner, GPO Box 5218, SYDNEY NSW 2001
Online Submission	<a href="https://forms.business.gov.au/smartforms/servlet/SmartForm.html?formCode=APC_PC&amp;tmFormVersion">https://forms.business.gov.au/smartforms/servlet/SmartForm.html?formCode=APC_PC&amp;tmFormVersion</a>

For more information, please visit [www.oaic.gov.au](http://www.oaic.gov.au).

## 17. Contractual Arrangements with Third Parties

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We ensure that all contractual arrangements with third parties adequately address privacy issues, and we make third parties aware of this Privacy Policy.

Third parties will be required to implement policies in relation to the management of your personal information in accordance with the Privacy Act. These policies include:

- Regulating the collection, use and disclosure of personal and sensitive information;
- De-identifying personal and sensitive information wherever possible;
- Ensuring that personal and sensitive information is kept securely, with access to it only by authorised employees or agents of the third parties; and
- Ensuring that the personal and sensitive information is only disclosed to organisations which are approved by us.