



Privacy Policy

When you use our services, you trust us with your information. We respect your privacy. This Privacy Policy is designed to ensure your personal information is protected and to help you understand what data we collect, why we collect it, and what we do with it.

This Privacy Policy applies to the websites and mobile applications ("Digital Applications") of LGen Solutions Pty Ltd A.B.N. 87 627 483 747

("we", "our" or "us"), and entities in the LGen Group and to its related applications, MMS, SMS, instant messaging, social media and other communications platforms and services.

At any time the Privacy Policy in force is published on the Digital Applications and is applicable to related services. By using the Digital Applications you agree to the Privacy Policy. If you do not accept the Privacy Policy in force from time to time, do not access, use, register as a user, submit information to, upload or download from the Digital Applications.

As overviewed in this Privacy Policy, we collect only personal information that is needed for the Digital Applications and we tell you in this Privacy Policy how we use your personal information. When you use the Digital Applications and any related services, we collect information sent to us by your computer, mobile phone or other access device.

1. How We Collect and Receive Personal Information

We collect and receive personal information about users of the Digital Applications and related services. This information is either collected or received by us or submitted or shared by users of the Digital Applications and related services.

The information includes data on the pages you access, your device's IP address, device identifiers, the type of operating system you're using, your location, mobile network information, and standard web log data. Standard web log data includes the browser type you're using and traffic to and from our Digital Applications.

When you download or use our mobile applications, or access one of our mobile optimised sites, we may receive information about your location and your mobile device, including a unique identifier for your device. We may use this information to provide you with location-based services, such as advertising, search results, and other personalised content. Most mobile devices allow you to control or disable location services in the device's settings menu. If you have questions about how to disable your device's location services, contact your mobile service carrier or the manufacture of your particular device.

In addition, we may collect and store any information you provide us when you use the Digital Applications or related services, including when you add information on a web form, add or update your account information, participate in discussions, chats, or resolution of dispute, or when you otherwise correspond with us.

2. Types of Personal Information We Collect, Analyse, Receive and Hold

We may collect the following types of personal information from you and your trusted advisors:

- (a) contact information, such as your name, address, email address, phone numbers, and similar information; and
- (b) personal situation information and documents, such as legal names, date of birth, family relationships, occupation, and similar information; and
- (c) personal wealth information and documents, such as employment, assets, liabilities, loans and similar information.

3. How We Use Personal Information

The lawful basis and primary purpose for collecting and processing your personal information and data is to provide you with a secure, smooth, efficient, and customised experience. We comply with the European General Data Protection Regulation which governs the protection of personal data of EU residents. We will afford UK-based users with all rights available to EU users, regardless of the UK's EU member status. We may use your personal information to:

- (a) provide you services from the LGen Platform, refer to the LGen Platform Terms of Service 2022
- (b) provide you - customer support and information on our services, events, programs, newsletters, email updates, and other services;
- (c) verify your identity, including during account creation and password reset processes and to pursue other activities within our legitimate interests as part of running our business and doing so in ways which do not hurt your interests and rights, for example obtaining identity, device and location information to prevent fraud and abuse and to keep the Digital Applications secure and obtaining and retaining data which tax laws require us to retain for payments made or received by us;

- (d) customise, measure, and improve the content, layout, and operation of the Digital Applications and related services;
- (e) contact you at any telephone number, or by placing a voice call or through text (SMS) or email messaging;
- (f) manage and protect our information technology infrastructure, which is necessary to provide the services and features you request and serve the legitimate interests of ourselves and third party processors;
- (g) share minimal personal information and data with third party processors in order for us to provide services including service providers of hosting, storage and infrastructure, security, insurance, analytics, communications and support, and payment processing;
- (h) perform creditworthiness and solvency checks, compare information for accuracy and verify it with third parties;
- (i) design products and services;
- (j) provide to you targeted marketing about our services and promotional offers and the services of our contractors unless and until you opt-out;
- (k) include you in our databases, directories, listings and digital applications to communicate with you and indicate your affiliation with us;
- (l) process any assignments by you and send notices about your assignments;
- (m) confirm your identity for the purposes of the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) and assess applications or creditworthiness for premier or business accounts or products and services offered to premier or business accounts with third parties;
- (n) resolve disputes, and troubleshoot problems;
- (o) detect, prevent or resolve violations of policies or applicable user agreements; and
- (p) manage our risks and help detect, prevent, and/or remediate fraud or other potentially illegal or prohibited activities.

If you are located in the European Union or other regions with laws governing data collection and use that may differ from Australian law, please note that we may transfer information, including personal information, to a country and jurisdiction that does not have the same data protection laws as your jurisdiction, and we will take steps reasonably necessary to ensure that any personal data is treated securely and in accordance with this Privacy Policy.

We provide services in conjunction with payment processors which may include processors such as financial or merchant facility providers such as Paypal. When you delete your account with us, we delete your personal data retained by us, except to the extent we are prevented by law from deleting your personal information or data. However, to delete any payment or billing information, you will need to do so with your payment provider, as we only has minimal secure access to those records as needed to provide the services.

4. Personal Profile

When you use the Digital Applications, subject to the services or functionality we introduce or change, you may upload or download content, set up your personal profile, form relationships, send communication, perform searches and queries, form groups, set up events, add applications, and transmit information through various channels. We collect this information so that we can provide to you the Digital Applications with personalised features. To provide you with more useful and personalised information the Digital Applications may also collect your personal information from other sources referred to in paragraph 1 above.

5. Privacy Settings

When you register with the Digital Applications, you may be asked to create your own profile and privacy settings. Your profile information is displayed to people in the networks specified in your privacy settings to enable you to connect with the Digital Applications and other users of them. We may occasionally use your personal information to send you notifications regarding new services offered by us, the Digital Applications or related services that we think you may find valuable.

When you use the Digital Applications, certain information you post or share with third parties (eg a friend or someone in your network), such as personal information, comments, messages, photos, videos, or other information, may be shared with other users in accordance with the privacy settings you select. All such sharing of information is done at your own risk. Please keep in mind that if you disclose personal

information in your profile or when posting comments, messages, photos, videos, or other items, this information may become publicly available.

6. Protection of Personal Information

We use technological, legal and training means to provide high levels of security and privacy for personal information.

Despite our security and privacy measures, personal information we collect is at your risk. Please be aware that no security measures are perfect or impenetrable. We cannot control the actions of other users with whom you may choose to share your pages and information. Even after removal, copies of user-generated content may remain viewable in cached and archived pages elsewhere or files stored by others. Any improper collection or misuse of information should be reported to us.

7. Privacy of Email Addresses

The Digital Applications provide users the opportunity to opt-out of receiving communications, usually at the point where we request information about the user.

8. Aggregated Browser Information

We analyse Digital Applications logs to constantly improve service. We use the log information to record various information regarding different sections of the Digital Applications. This helps make the Digital Applications more useful.

9. Cookies

We may use cookies and similar technologies. Cookies are pieces of data that a website or email transfers to your device's hard disk. Cookies can make your use of the web faster and beneficial by storing information about your preferences. The use of cookies is an industry standard and many major sites use them to provide useful features for their customers. Cookies in and of themselves do not personally identify users, although they do identify a user's device. Most browsers are initially set up to accept cookies. If you'd prefer you can set yours to refuse cookies. However, you may not be able to take full advantage of a website if you do so.

10. Permitted Disclosure

If you become a registered user of any of the Digital Applications, you will be taken to consent to:

- (a) your personal data being transferred to and processed in countries where our hosting servers are located;
- (b) us using your personal information to check your identity, including to check your status (eg as a member of a defined user group) and for any merchant facility arrangement we have with bankers, their respective related bodies corporate, and their respective officers, employees and agents;
- (c) use of your personal information by us and our authorised personnel and service provider contractors; for example, to improve service we may provide your personal information as statistical data to others for research and analysis purposes; and as another example we may use Google Analytics and give you notice of its operation on the webpage titled "How Google uses data when you use our partners' sites or apps" (located at www.google.com/policies/privacy/partners/).
- (d) us disclosing your personal information in situations where we reasonably believe it is necessary to identify, contact or bring legal action against anyone damaging, injuring, or interfering with our rights, either intentionally or unintentionally; and
- (e) us disclosing your personal information to law enforcement agencies and others if we in good faith believe we are legally obligated to do so.

11. Links

The Digital Applications may contain links to sites and applications published by others. We have no control over their privacy practices.

12. Right of Access and Correction

Generally speaking, you may access the personal information the Digital Applications hold about you by sending an email giving full details to our Privacy and Data Protection Officer set out in paragraph 20. Generally, if any of that information is incorrect, you can have that information corrected by sending an email giving full details to that Privacy and Data Protection Officer. If you provide us with your personal information and you later decided that you would no longer like to receive information from us, follow the "unsubscribe" directions at the end of any email or other communication you receive from us. You may withdraw consent by deleting your account at any time.

13. Consent for Platform Applications

If you, your friends, or members of your network use any third-party applications developed using third party applications on the Digital Applications ("Platform Applications"), you consent to those Platform Applications accessing and sharing certain personal information about you with others in accordance with your privacy settings. We do not screen or approve developers of Platform Applications and cannot control how those developers use any personal information that they may obtain in connection with Platform Applications.

14. Children Under Age 13

We do not knowingly collect or solicit personal information from anyone under the age of 13 or knowingly allow such persons to register. If you are under 13, please do not attempt to register or send any information about yourself to us, including your name, address, telephone number, or email address. No one under age 13 is permitted to provide any personal information to or on the Digital Applications. If we learn that we have collected personal information from a child under age 13 without verification of parental consent, we will delete that information as quickly as possible. If you believe that we might have any information from or about a child under 13, please contact us at PrivacyOfficer@LGen.Email.

15. Third Party Use of Personal Information

We are not responsible for the practices or content of other services or sites that are operated by third parties but which are linked to our Digital Applications. If we are linked to third party services or sites, it does not necessarily constitute sponsorship, endorsement or approval by the Digital Applications of the content, policies or practices of those services or sites. If you leave our Digital Applications via such a link, you should check the privacy policy of the third party site.

We may use third parties to manage the Digital Applications and activities from time to time, including, but not limited to, promotions and statistical analysis. These parties may have access to and store the personal information of users of the Digital Applications. Similarly, we may contract with third parties to handle requests for information submitted to us.

16. Disclosure or Sale

Unless and until you opt-out, you consent and request for us to provide to you targeted marketing about our services and promotional offers and to use and disclose your personal information for provision of information

by our contractors and others. Except as specified in this Privacy Policy, **we will not sell your personal information.**

17. Business Transfer

If the ownership changes of all or a substantial part of our business, or individual business units, your personal information (including your profile with the Digital Applications) may be transferred to the new owner so the service or the transferred part of it can continue operations. In any such transfer of information, your personal information would remain subject to this Privacy Policy at the time of the transfer and then to the privacy policy of the new owner.

18. Privacy Policy Continuity

This Privacy Policy may change, so we encourage you to check it from time to time. If we develop a revised privacy policy then on its publication on the Digital Applications it will supersede the one before it.

19. Objections and Complaints about Our Privacy Practices

You have a right to object to our use of your personal data. For any complaint about our privacy practices, please provide details to the Privacy and Data Protection Officer, whose contact details are in paragraph 20. We will then respond.

20. Contact Details

For any questions regarding the above Privacy Policy please contact:

Privacy and Data Protection Officer
LGen

P.O. Box 221, Sutherland, NSW, 1499, Australia

Web: <https://estateplanning.family/contact-us>

Phone: Ph 1300 390 699

Email: PrivacyOfficer@LGen.Email