Privacy Policy

How we manage your personal information

Company	LTG Gold Rock Pty Ltd
AFSL	286510
ABN	94 099 107 365
ACN	099 107 365
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Contact	support@ltggoldrockstocks.com.au 0406 045 487

Please read this Privacy Policy carefully. By using our website or services, you acknowledge that your personal information will be handled as described in it.

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1. About this Privacy Policy

1.1 Who we are

LTG Gold Rock Pty Ltd (ABN 94 099 107 365, AFSL 286510) (**LTG Gold Rock**, **we**, **us**, **our**) provides general financial product advice and online research and analysis tools relating to securities, derivatives and foreign exchange contracts through our website, ltggoldrockstocks.com.au.

We provide general advice only. We do not take your objectives, financial situation or needs into account, we do not hold client funds and we do not execute trades for you.

1.2 About this Privacy Policy

This Privacy Policy explains how we collect, use, disclose, store and protect your personal information, and how you can access and correct it or make a complaint. We are bound by the Privacy Act 1988 (Cth) and the Australian Privacy Principles (**APPs**).

This Privacy Policy applies to our clients and subscribers, visitors to our website, people who contact us, and job applicants. **Personal information** means information or an opinion about an identified individual, or an individual who is reasonably identifiable.

2. Personal Information We Collect

2.1 Kinds of personal information

We only collect personal information that is reasonably necessary to provide our services and run our business. Depending on how you deal with us, this may include:

- **contact details**, such as your name, email address, phone number and address;
- **account details**, such as your username, password, subscription plan, account status and login history;
- **payment details**, such as your billing name, billing address and transaction history. Card payments are processed securely by our payment provider, Stripe. We do not store your full card number;
- **communications**, such as emails, live chat messages, phone call notes, feedback and complaints;
- **technical and usage information**, such as your IP address, device and browser type, cookies and how you use our website and research tools;
- **marketing preferences**, such as whether you have subscribed to or opted out of our emails; and
- **job applicant information**, such as your resume, employment history, qualifications, references and the results of background checks you consent to.

2.2 Sensitive information

We do not generally collect sensitive information, such as health information or criminal records. If we need it (for example, a police check for a job applicant), we will only collect it with your consent or where the law requires or allows it.

2.3 If you do not provide your information

If you do not give us the information we ask for, we may not be able to set up your account, process your payment, provide our services or respond to your enquiry.

3. How We Collect Personal Information

3.1 Information you give us

We collect most personal information directly from you, for example when you:

- sign up for an account or subscription;
- use our website, Stock Screener or other research tools;
- subscribe to our emails or complete a form;
- contact us by email, phone or live chat;
- make a complaint or request; or
- apply for a job with us.

3.2 Information from others

We may also collect personal information from third parties, such as our payment provider (to confirm payments), website analytics providers, and referees and screening providers for job applicants. Where we collect information from someone else, we take reasonable steps to make sure you are aware of it.

3.3 Cookies and analytics

Our website uses cookies and similar technologies to keep you logged in, remember your preferences, keep the site secure and understand how the site is used. Analytics information is generally collected in a way that does not identify you directly.

You can set your browser to refuse or delete cookies. If you do, some parts of our website, such as logging in to your account, may not work properly.

3.4 Dealing with us anonymously

You can ask general questions without identifying yourself or by using a pseudonym. We need to identify you to set up a subscription, process payments, investigate a complaint or where the law requires it.

3.5 Information we did not ask for

If we receive personal information we did not ask for and could not otherwise have collected, we will destroy or de-identify it where it is lawful and reasonable to do so.

4. How We Use Your Personal Information

4.1 Why we use your information

We use your personal information to:

- create and manage your account and subscription;
- give you access to our website, general advice, research and analysis tools;
- process payments and manage billing;
- give you our Financial Services Guide, Terms of Service and other important information;
- respond to your enquiries, requests and complaints;
- send you service updates and, if you agree, marketing communications;
- keep our website and tools secure, and improve them;

- meet our legal and regulatory obligations, including those that apply to us as an Australian financial services licensee; and
- assess job applications.

We only use or disclose your personal information for another purpose if you consent, if you would reasonably expect us to use it for a related purpose, or if the law requires or allows it.

4.2 Marketing and how to opt out

With your consent, we may send you emails about our research, tools and offers. Every marketing email includes an unsubscribe link. You can also opt out at any time by contacting us. We will act on your request within 5 business days.

Even if you opt out of marketing, we will still send you important service and account messages. We do not sell or trade your personal information.

5. Who We Disclose Your Information To

5.1 Disclosure to third parties

We may disclose your personal information to:

- service providers who help us run our business, such as providers of email and document software, website hosting, customer relationship management, telephone, payment processing (Stripe), market data and AI services;
- our professional advisers, such as lawyers, accountants and auditors, and our insurers;
- regulators and dispute resolution bodies, such as the Australian Securities and Investments Commission (ASIC), the Australian Financial Complaints Authority (AFCA), the Office of the Australian Information Commissioner (OAIC) and the Australian Taxation Office; and
- law enforcement agencies or others where the law requires or allows us to.

Our service providers may only use your information to provide services to us and must protect it.

5.2 Disclosure overseas

Some of our service providers store or process information outside Australia. Your personal information is likely to be stored or processed in the **United States**, and may also be held in other countries where our providers operate data centres.

Before disclosing personal information overseas, we take reasonable steps to ensure the recipient handles it in a way that is consistent with the APPs, including by reviewing each provider's privacy and security terms.

6. Automated Decisions and AI

Our research tools, including our AI Product Framework, use software and artificial intelligence to produce general market research and analysis. These tools do not use your personal information to make decisions about you.

We do not use computer programs to make decisions that could significantly affect your rights or interests (such as decisions about your access to our services) based on your personal information. If this changes, we will update this Privacy Policy to explain the kinds of personal information used and the kinds of decisions made.

We do not enter your personal information into AI tools unless it is necessary for a purpose described in this Privacy Policy and appropriate safeguards are in place.

7. How We Store and Protect Your Information

7.1 Security

We hold personal information electronically using secure cloud based systems. We take reasonable steps, including technical and organisational measures, to protect it from misuse, interference, loss and unauthorised access, modification or disclosure. These include:

- limiting access to staff who need it for their role;
- multi factor authentication and strong password controls;
- encryption where supported by our systems;
- staff training on privacy and cyber security; and
- reviewing the security of our service providers.

No method of transmitting or storing information online is completely secure. Please keep your login details confidential and tell us straight away if you think your account has been compromised.

7.2 How long we keep it

We generally keep records about our clients and services for 7 years, because the law requires us to keep certain financial, complaints and compliance records. When we no longer need your personal information and are not required to keep it, we securely destroy or de-identify it.

8. Accessing and Correcting Your Information

8.1 Access

You can ask for access to the personal information we hold about you by contacting us (see section 11). We will:

- verify your identity before giving you access;
- respond within 30 days; and
- not charge you for making a request. We may charge a reasonable fee for providing access, and will tell you before we do.

In limited cases the law allows us to refuse access. If we do, we will tell you why in writing and how you can complain.

8.2 Correction

You can update many of your account details yourself through your account. If you think any information we hold is inaccurate, out of date, incomplete, irrelevant or misleading, contact us and we will take reasonable steps to correct it within 30 days. If we do not agree to correct it, we will tell you why in writing and, if you ask, note your request with the information.

9. Data Breaches

If a data breach occurs involving your personal information that is likely to result in serious harm to you, we will notify you and the OAIC as soon as practicable, as required by the Notifiable Data Breaches scheme. We will tell you what happened and what steps you can take to protect yourself.

10. Making a Privacy Complaint

10.1 Contact us first

If you have a concern about how we have handled your personal information, please contact us first using the details in section 11 and give us as much detail as you can. We will:

- acknowledge your complaint within 1 business day; and
- give you a final written response within 30 calendar days.

10.2 If you are not satisfied

If you are not satisfied with our response, you can contact:

- the **Office of the Australian Information Commissioner (OAIC)**: www.oaic.gov.au, phone 1300 363 992, or GPO Box 5288, Sydney NSW 2001; or
- the **Australian Financial Complaints Authority (AFCA)**, if your complaint relates to our financial services: www.afca.org.au, email info@afca.org.au, phone 1800 931 678, or GPO Box 3, Melbourne VIC 3001. Our AFCA membership number is 12422.

11. Contact Us and Changes to this Policy

11.1 Contact us

For privacy questions, requests or complaints, please contact our Privacy Officer:

Privacy Officer	LTG Gold Rock Pty Ltd
Email	support@ltggoldrockstocks.com.au
Phone	0406 045 487
Post	3 Zamia Street, Sunnybank QLD 4109
Office hours	9am to 5pm AEST, business days

11.2 Changes to this Privacy Policy

We may update this Privacy Policy from time to time, for example when the law or our services change. The current version will always be available on our website, with the date it was last updated. You can ask us for a free copy in another form, such as a printed copy.