

**MC DIGITAL SERVICES PTY LTD**  
**Privacy Policy**  
**November 2024**

## **1. Introduction**

This Privacy Policy (this “Policy”) applies to the trading platform (including any applicable mobile applications and websites used to access the same) (collectively the “Platform”) provided by Coins.ph (“we”, “us”, or “our”). It describes how we collect, use and disclose Personal Information that we obtain from current or prospective customers or users (“you” or “your”) of the Platform and any account services provided through the Platform. For the purposes of this Policy and associated Platform user agreement at: [\(insert link to User Agreement\)](#), “Personal Information” refers to any information that relates to an identified or identifiable individual. We do not consider Personal Information to include information that has been anonymized so that it does not identify a specific user.

**MC DIGITAL SERVICES PTY LTD** (“MC Digital”) is the controller of your personal information under the Australian Privacy Act 1988 and is bound by the Australian Privacy Principles (APPs). As a Controller, we determine the purposes and means for processing personal information, ensuring it is handled responsibly and in compliance with the APPs.

## **2. Consent**

By providing Personal Information to us and/or registering as a user with us, you consent to our collection, use and disclosure of your Personal Information in accordance with this Policy and associated Platform user agreement at: [\(insert link to User Agreement\)](#).

## **3. Information we Collect**

### **3.1. Purpose of Collection**

If we deal with you as a current or prospective customer, or user, we may collect your Personal Information in order to provide any of our services and products to you. We do not collect Personal Information unless it is reasonably necessary for, or directly related to, one or more of the services or products we provide or functions we carry out.

### **3.2. Information Collected**

- a. **Collection of Personal Information.** We collect personal data through various channels, including when you:
  - a) We collect and process Personal Information about you directly from you when you register to use the Platform or submit such information as a part of the Know-Your-Client (“KYC”), as well as automatically through your use of the Platform.
  - b) The information may include your:
    - i. **Basic customer information**, such as name, email address, and phone number, date of birth, residential address, and postal address;
    - ii. **Supplemental identification information**, such as utility bills, government issued ID number, passport, proof of residency, occupation and place of work;

- iii. **Financial information**, such as your bank account details, tax identification number, income/net assets/ wealth verification statements;
  - iv. **Transaction history on the Platform**, such as information about the transactions made on our Platform, such as the name of the sender, the name of the recipient, the amount, currency preference, payment method, date and/or timestamp;
  - v. **App, browser, and device information**, such as IP address, device information, operating system, and other device characteristics or identifiers (e.g. plugins, the network you connect to); and
  - vi. **Browsing activity and additional information** you submit to us on the Platform, which include communications with us and our customer support team and referral information.
- c) In the course of our service, we may also need to collect information of a more sensitive nature in accordance with the APPs.
- d) Lastly, we shall also collect your personal information when we are legally required or authorized by an Australian law or court or tribunal order to collect your personal information.

#### **4. How we collect your Personal Information**

- (i) When you visit our Platform. When you visit our Platform, we collect information sent to us by your computer, mobile phone, or other access device. This information may include your IP address, browser type, operating system, and other device characteristics or identifiers.
- (ii) When you register for our services. When you register for our services, we collect information such as your name, email address, phone number, date of birth, residential address, and postal address. We may also collect additional information such as your driver's license number or other information to verify your identity or address.
- (iii) When you use our services. When you use our services, we collect information about your transactions and your other activities on our website. This information may include the amount of money you send or receive, the date and time of the transaction, and the recipient's name and address. We may also collect information about your computer or other access device for fraud prevention purposes.
- (iv) When you connect your account to third-party services. You may choose to connect your Coins.ph account to third-party services such as social media sites. When you do this, we may collect information from those third-party services, such as your name, email address, and profile picture.
- (v) To protect against fraud and misuse. We may collect information about your use and interaction with our Platform to help protect against fraud and misuse of your Personal Information. For example, we may evaluate your computer, mobile phone, or other access device to identify any malicious software or activity that may affect the availability of our services.
- (vi) Other ways. We may also collect additional information from or about you in other ways, such as interactions with our customer support team.

## **5. How we Use your Personal Data**

We use your personal data for the following purposes:

- To comply with legal and regulatory obligations, including KYC (Know Your Customer) and AML (Anti-Money Laundering) requirements under applicable laws and regulations.
- To process your transactions and provide you with access to our services.
- To improve our platform and tailor your experience based on your preferences.
- To communicate with you, including sending updates about your account or responding to your inquiries.
- To prevent fraud, money laundering, and other illicit activities in compliance with the APP.

## **6.. How we use cookies**

- a. experience, provide our services, and understand how customers use our services so we can make improvements. To enable our systems to recognise your browser or device and to provide our services to you, we use cookies.
- b. We use these technologies to:
  - i. recognize you as our customer or user when you sign-in to use our services;
  - ii. customize our services, content, and advertising;
  - iii. keep track of your preferences such as currency and language;
  - iv. measure promotional effectiveness; and
  - v. collect information about your computer or other access device to mitigate risk, help prevent fraud and promote trust and safety.
- c. Third Party. You may encounter our cookies or pixel tags on websites that we do not control. For example, if you view a web page created by a third-party or use an application developed by a third-party, there may be a cookie or pixel tag placed by the web page or application. Likewise, these third-parties may place cookies or pixel tags that are not subject to our control and our Policy does not cover their use.

## **7. Data Retention**

We store collected information for as long as it is necessary to perform our contractual obligations to you, including providing our products and services to you. Your information and information about your transactions is stored for the duration of our contractual relationship with you.

If the contract is terminated, by way of account deletion or otherwise, either by you or by us, this information will be deleted, unless required by applicable laws and regulations, including anti-money laundering laws. The information may be retained wholly or in part for a longer or a shorter period in accordance with applicable laws or for any other justified reason. Retention periods may be altered from time to time based on regulatory or other changes.

## **8. How we share your Personal Information**

We may share your personal data with the following parties:

- Regulatory bodies such as AUSTRAC, to meet legal and regulatory obligations.
- Third-party service providers for activities like identity verification, payment processing, and analytics, ensuring they adhere to the standards set forth by the APP.
- Our affiliate companies, which are located overseas and are contracted to support our technology, operational, and customer service teams.

When transferring data internationally, we will ensure that the receiving jurisdiction provides adequate protection for your data, in compliance with Australian and international data protection laws.

## **7. Data Security**

We employ robust technical and organizational measures to protect your personal data from unauthorized access, loss, or misuse. These include encryption, access controls, and regular security audits in accordance with APP. If a data breach occurs, we will notify you and the Office of the Australian Information Commissioner (OAIC) where serious harm is likely, as required by the Australian Notifiable Data Breaches (NDB) scheme.

## **8. Your Data Privacy Rights**

Under the Australian Privacy Act 1988, you have the following rights, among others:

1. Right to Access: Request access to personal information we hold about you.
2. Right to Correction: Request correction of inaccuracies.
3. Right to Withdraw Consent: Withdraw consent for marketing at any time.

Please note that notwithstanding the foregoing, there may be circumstances in which we are unable to accommodate a request to edit, update, access, or delete an account profile or Personal Information. This includes but is not limited to:

1. any basis where such request can be denied under applicable law;
2. where we need to retain the information to comply with federal, state, or local laws or for accounting or tax purposes;
3. where we need to comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, or local authorities;
4. where we need to cooperate with law enforcement agencies concerning conduct or activity that the business, service provider, or third party reasonably and in good faith believes may violate federal, state or local laws;
5. where we need to retain information to exercise or defend legal claims; and
6. where the information contains legal privilege or proprietary information of another party; or where complying with the request would compromise others' privacy or other legitimate rights.

To the extent permitted by applicable laws, we reserve the right to charge you a reasonable fee for the handling and processing of your requests to access your personal data, where applicable. If we so choose to charge, we will provide you with a written estimate of the fee we will be charging. Please note that in many jurisdictions we are not required to respond to or deal with your access request unless you have agreed to pay the fee.

In the event of a personal information breach likely to result in serious harm, we will notify you and the Office of the Australian Information Commissioner (OAIC) as required under the Australian Notifiable Data Breaches (NDB) scheme.

## **9. Privacy Complaints**

If you have any questions about this Policy, or if you have a complaint about our handling of your personal information, please contact us at [dpo@coinsxyz.mu](mailto:dpo@coinsxyz.mu). We aim to resolve your query as soon as practicable.

If we cannot resolve your complaint to your satisfaction, you may complain to the Office of the Australian Information Commissioner who may investigate your complaint further.

## **10. Changes to This Privacy Policy**

We may update this privacy policy from time to time to reflect changes in our practices or legal requirements. You will be notified of any material changes via our platform or other appropriate communication channels.