

Privacy Policy

Effective Date: November 2025

Entity: Allodial Financial Services Aboriginal and Torres Strait Islander Corporation (ACDC)

ACDC respects your privacy and is committed to protecting your personal information in accordance with the Privacy Act 1988 (Cth), the Australian Privacy Principles (APPs), and where applicable, international standards such as the EU General Data Protection Regulation (GDPR).

1. Purpose of this Policy

This Privacy Policy explains how we collect, store, use, and disclose personal information when you interact with us — whether through our website, digital platforms, applications, or by other means. By accessing our website or using our services, you consent to the terms of this Privacy Policy.

2. What Personal Information We Collect

We may collect and hold the following types of information:

- Name, date of birth, and contact details (email, phone, address)
- Identification information (driver's licence, passport, or other government-issued ID)
- Payment details and transaction history
- Information required for Know Your Customer (KYC) or Anti-Money Laundering (AML) compliance
- Information you provide when subscribing to newsletters, participating in surveys, or contacting us
- Website usage information (IP address, browser type, device information, cookies, and analytics data)

3. How We Collect Personal Information

We collect information directly from you when you register, complete KYC, make transactions, or contact us.

We may also collect information from third parties such as identity verification providers, financial institutions, or regulators where permitted by law.

4. How We Use Personal Information

Your information may be used for purposes including:

- Providing and improving our financial and digital services
- Verifying your identity and complying with KYC/AML obligations
- Processing transactions, deposits, and token purchases

- Responding to inquiries and providing customer support
- Sending marketing communications (only where you have opted in)
- Conducting audits, data analytics, and service improvements
- Meeting legal, regulatory, or risk management obligations

We do not sell or rent your personal information to third parties.

5. Disclosure of Personal Information

We may disclose your personal information to:

- Our authorised employees and service providers
- Financial institutions and payment processors
- Regulatory or enforcement agencies, where required by law
- External IT, security, and analytics providers
- International partners or affiliates assisting in service delivery

If we transfer personal information outside Australia, we ensure equivalent privacy protections are in place.

6. Cookies and Website Analytics

Our website uses cookies and analytics tools to enhance user experience and improve site performance.

You can modify your browser settings to decline cookies, but this may affect functionality.

7. Data Security

We employ industry-standard security measures including encryption, restricted access, vulnerability assessments, multi-factor authentication, and incident response procedures. While we take all reasonable precautions, no online service can guarantee absolute security.

8. Data Retention

We retain personal information only as long as necessary for the purposes described in this Policy or as required by law.

Information that is no longer required will be securely deleted or anonymised.

9. Your Rights

You may request to access, correct, or delete your personal information; withdraw consent; or lodge a complaint.

GDPR users have additional rights to data portability and to lodge complaints with local data protection authorities.

10. Third-Party Links

Our website may contain links to third-party websites. We are not responsible for their privacy practices and encourage you to review their respective privacy policies.

11. Changes to this Policy

We may update this Privacy Policy periodically. The most recent version will always be available on our website, with the effective date clearly displayed.

12. Contact Us

If you have questions or concerns, please contact:

Privacy Officer

Allodial Financial Services Aboriginal and Torres Strait Islander Corporation (ACDC)

Email: privacy@allodialcoin.com

Mail: PO Box Q229,

Queen Victoria Building,

NSW 1230, Australia

Phone: +61 02 8866 1348

We will acknowledge and respond to all privacy-related inquiries promptly and in accordance with applicable law.