

# Privacy Policy

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*Last updated: 7 January 2019*

The purpose of this document is to outline how Rivkin collects and maintains your personal information. It also states how this information is used, updated and made available to those parties eligible to access it. Any reference to “Rivkin”, “we”, “us” or “our” refers to the Rivkin group of companies, explicitly Tarfaya Nominee Pty Ltd ACN 001 350 634 (trading as The Rivkin Report) and Rivkin Securities Pty Ltd ACN 123 290 602.

This Privacy Policy may be updated from time to time, as changes to our operational and corporate structure are made. This Privacy Policy was last updated on 7 January 2019 and is written and enforced in accordance with the Australian Privacy Principles contained in the Commonwealth Privacy Act 1988.

## OVERVIEW

Rivkin will be provided with personal information when a user accesses any Rivkin website or attempts to contact Rivkin electronically, in person, by phone or by post. If you are providing information about someone other than yourself, you are guaranteeing Rivkin that the person in question has been informed of the information being provided and has access to this Privacy Policy.

Rivkin will maintain, update and add to your personal information whenever contact is made electronically, in person, by phone or by post, by you or by Rivkin.

## WHAT PERSONAL INFORMATION DO WE COLLECT?

When you visit a Rivkin website, our web applications may record your IP address, the date, time and duration of your visit, the web site from which you visit us, the type of computer software used to access our site as well as the web pages you visit or documents you download.

Rivkin may place a pixel on pages on our site, or those of other companies that are presenting advertisements. This enables us to record in our server logs that a specific user id has visited a particular page. This data allows us to analyse and determine our audience’s behavioural characteristics, which helps us to optimise our site, advertisement placement, and communication focus. Only anonymous, non-personally identifiable information is collected, and it cannot be tracked to a specific individual.

We will also collect any personal information that you submit to us via electronic or non-electronic means, as required for legal and operational use. If further information is required, Rivkin may use third-party sources, such as the ASIC Company Names database to verify ACN or ABN details, for instance.

## HOW DO WE COLLECT AND STORE YOUR PERSONAL INFORMATION?

We track website visitors using cookies, which are electronic tokens containing small amounts of information that are passed between a web browser and a web server. They are used to maintain session state between pages or to retain information between visits if you return to the website at a later time.

We use cookies to correlate passive activity tracking data as well as to authenticate supply of information such as enquiries, comments, and votes to minimise malicious or spam traffic.

In some cases we serve advertisements that lead to a Rivkin website. Our web advertising partners, who include Google (Google), may place or recognise a unique cookie on your browser. For more information about Google and display advertising features, and how to opt-out of its tracking methods, please [click here](#).

All information submitted by you using electronic or non-electronic means may be recorded using our telephone system, network server, customer relationship management database or web server. Where external parties are used to maintain data (such as website hosting companies or financial auditing firms), your information may be stored by a company other than Rivkin.



## WHO CAN ACCESS MY PERSONAL INFORMATION?

Rivkin may disclose your information to its employees, agents and affiliates inside or outside your country of residence for the purpose of providing services to Rivkin. Our employees, agents, affiliates and third party providers who have access to personal data obtained through Rivkin websites are obliged to respect privacy.

We may also disclose your information to governmental agencies or entities, regulatory authorities, or other persons in line with applicable rules, orders, subpoenas, official requests, or similar processes as either required or permitted by applicable law.

## ACCESSING YOUR PERSONAL INFORMATION

You have the right (excluding exceptions outlined in the Privacy Act) to seek access to and update or correct the personal information we hold about you. If you make an access request, we will ask you to verify your identity. We may charge a fee to cover the costs of meeting your request.

## CALL RECORDING

Rivkin may record incoming and outgoing telephone conversations for training or quality purposes. If you do not want your call recorded, please advise a Rivkin employee at the beginning of your conversation.

## CONSENT

By accessing our website, contacting Rivkin or by submitting an application to become a Rivkin client, you consent to Rivkin collecting, maintaining, using and disclosing personal information about you and provided by you or by another person as described above.

## HOW TO CONTACT US

If you have any questions or complaints about how we collect, use, disclose, manage or store your personal information, or would like to request access or changes to the information we hold, please contact us by telephone on 61 2 8302 3601, email [concerns@rivkin.com.au](mailto:concerns@rivkin.com.au), or in writing at:

Client enquires  
PO Box 1524  
Double Bay NSW 1360

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