



PRIVACY POLICY

31 July 2025

Austral Capital Limited
(trading as PE Projects)

Email
support@pe-projects.com

Website
www.pe-projects.com

Privacy Policy

Effective Date: 31 July 2025

Introduction

PE Projects is the trading brand of Austral Capital Limited (“PE Projects”, “Austral”, “we”, “our”), a New Zealand-registered financial service provider. We are committed to protecting your privacy in accordance with the **New Zealand Privacy Act 2020** and, where applicable, the **General Data Protection Regulation (GDPR)**.

This Privacy Policy outlines how we collect, use, store, share, and protect personal information when you access our services, visit our websites (www.pe-projects.com, app.pe-projects.com, academy.pe-projects.com), or interact with us.

1. What Personal Information We Collect

We may collect the following personal data: - Full name and contact details (email, phone, address) - Date of birth, nationality, tax residency and identification numbers - Identity verification documents (e.g., passport, driver’s licence) - Proof of address (e.g., utility bill, bank statement) - Employment and financial information (e.g., income, assets, bank details) - Trading history and platform usage activity - IP address, browser/device metadata, location data - Audio, video or chat transcripts during support or onboarding interactions

2. How We Collect Your Information

We may collect personal information: - Directly from you during onboarding or communication - Automatically via cookies, web analytics, and usage tracking tools - From third parties you authorise (e.g., payment providers, KYC platforms) - From public registers, sanctions screening, or fraud databases.

3. Why We Collect and Use Your Information

We use personal information to: - Open and maintain your account - Perform identity verification (KYC) and comply with AML/CFT laws - Operate and manage access to the PE Projects platform - Process transactions and communicate account activity - Improve platform security, usability, and service delivery - Satisfy legal and regulatory reporting obligations - Prevent fraud, enforce contracts, and protect our interests

4. Legal Basis for Processing

We rely on the following lawful bases to process your data: - Your **explicit consent** (where required) - **Contractual necessity** (e.g., to provide our services) - **Legal obligation** (e.g., AML/CFT laws) - **Legitimate interests**, such as fraud prevention and system performance

5. Disclosure of Personal Information

We may share your data with: - Service providers assisting with onboarding, KYC, payments, or hosting - Exposure providers (e.g., RGI Investment Ltd) for reference-only purposes - Our

professional advisors or auditors - Regulators, law enforcement, or dispute resolution bodies (e.g., FSCL)

All third-party disclosures are subject to confidentiality and security obligations.

6. Overseas Transfers of Information

Your information may be processed or stored outside of New Zealand (e.g., via cloud services, or providers in the EU, UK, or Mauritius). We take reasonable steps to ensure appropriate safeguards are in place, including contractual protections and secure data handling practices.

7. Data Security

We apply technical and organisational measures to safeguard your data: - Encryption of sensitive data in transit and at rest - Access controls and role-based permissions - Secure cloud storage with daily backups - Employee training and internal audits

You are responsible for keeping your login credentials secure.

8. Data Retention

We retain your personal data: - For the duration of your client relationship - For a minimum of **seven (7) years** after account closure, as required under AML regulations - Longer where necessary to comply with legal, tax, or contractual obligations

9. Your Rights

You may: - Request access to or correction of your personal data - Withdraw consent (where processing is based on consent) - Request deletion or restriction of processing - Object to certain types of processing (e.g., direct marketing) - Lodge a complaint with the NZ Privacy Commissioner or FSCL (www.fscl.org.nz)

10. Cookies and Tracking Technologies

We use cookies and tools (e.g., Google Analytics, Meta Pixel) to: - Monitor site traffic and performance - Detect and prevent security threats - Personalise user experience

For more details, see our [Cookie Policy]. You can manage cookies via your browser settings or our cookie banner.

11. GDPR Considerations (Where Applicable)

If you are located in the European Union, you may also have the right to: - Data portability - Restrict profiling or automated decision-making - Obtain human review where profiling is involved.

While PE Projects does not market to EU residents, we will respect these rights where applicable.

12. Changes to This Privacy Policy

We may revise this Policy from time to time. Updates will be posted on our website with the effective date. Continued use of our services implies your acceptance of any changes.

13. Contact Us

For questions or requests regarding your data, please contact:

Privacy Officer

PE Projects (Austral Capital Limited)

Email: compliance@pe-projects.com

Website: www.pe-projects.com