

# Ishtar Pty Ltd Privacy Policy

ABN: 52600543708

## **Responsibility**

1. Ishtar is responsible for all the personal information you provide to it and will deal with that information in accordance with the following Privacy Principles.
2. Ishtar has implemented procedures to implement its Privacy Principles and to deal with complaints and enquiries. Our Compliance Manager has overall responsibility for ensuring that Ishtar and its employees, agents and subsidiaries comply with our Privacy Principles. Our Compliance Manager may be contacted in relation to any enquiry or complaint at: [luaymm@gmail.com](mailto:luaymm@gmail.com)

## **Privacy Principles**

### *Purpose*

1. Ishtar will collect personal information only for the purpose of providing its services to you or for any purpose that is directly incidental to the provision of those services. Ishtar will not use your personal information for any other purpose unless the new purpose is required by law.

### *What kind of personal information we collect and hold?*

1. Full Name
2. Address
3. Mobile number
4. Email address
5. Occupation
6. Beneficiary full name
7. Beneficiary address
8. Beneficiary bank account details
9. Proof of ID e.g. Australian Driver's License, State issued Photo ID, Australian Passport or International Passport
10. Source of income
11. Source of wealth

## *How do we collect personal information?*

We collect personal information from our customer at the time of onboarding. Often we would collect these and additional information by direct communication with the customer e.g. phone call, email, WhatsApp, and face to face meetings. We may also collect customers' personal information from a third party e.g. electronic verification services. In doing so, we always make sure that the customer is aware of our Privacy and Information Retention Policy.

## *Why do we collect personal information?*

Ishtar is a money remittance business which regulated by Australian government agency AUSTRAC. In order for us to satisfy our regulatory obligations under relevant AML/CTF Laws (Anti-Money Laundering and Counter-Terrorism Financing Act 2006.), for example the obligation that Ishtar takes reasonable steps to verify the identity of its customers. Also as this business is a Reporting Entity, it has obligation to report all the inward and outward money transfer transactions to AUSTRAC with correct and up to date information. Hence it has to collect and verify personal information of its customers and their money transfer activities.

## *Consent*

1. Ishtar will seek your consent to use your personal information that you provide for verification and remittance purposes only. For example, to use your name, address, telephone number and other details necessary for us to verify your identity.
2. You may withdraw your consent at any time except when your transaction is running in-flight, subject to any legal restrictions and subject to any contractual restrictions you have already entered into with us, and provided that you give us reasonable notice in writing. We will explain to you the implications of such withdrawal.
3. We may from time to time send you information that is relevant to the provision of our services. If, at any time, you do not wish to receive that information, you may by sending us an email opt-out and request that you are not included in any future mail-outs.
4. There may be circumstances in which Ishtar is obliged to collect, use, or disclose certain personal information without your consent. Such circumstances include:
  1. a serious and imminent threat to someone's life, health or safety;
  2. a serious threat to public health or public safety;
  3. unlawful activity has been, is being or may be engaged in;
  4. disclosure is required or authorised by law;
  5. Ishtar reasonably believes that the use or disclosure is necessary for the prevention, detection, investigation, prosecution or punishment of:
    1. criminal offences, breaches of a law imposing a penalty or sanction or breaches of a prescribed law;
    2. the enforcement of laws relating to the confiscation of the proceeds of crime;
    3. the protection of the public revenue;
    4. the prevention, detection, investigation or remedying of seriously

- improper conduct or prescribed conduct; or
- 5. the preparation for, or conduct of, proceedings before any court or tribunal, or implementation of the orders of a court or tribunal.
- 5. If Ishtar is obliged to use or disclose your personal information under paragraph 4, it will create a written report of the use or disclosure.

## *Limiting Collection and Retention of Information*

1. In some circumstances, we may also disclose your personal information to intermediary banks in order to process certain transactions on your behalf, for example, by disclosing your name and address.
2. Ishtar will disclose your personal information and details about your transaction to AUSTRAC.
3. The amount and type of information collected by Ishtar will be limited to that which is necessary to provide our services.
4. Personal information shall be retained only for as long as may be necessary for the fulfilment of the purpose for which the information is collected. However, you should be aware that Ishtar is obliged under relevant anti-money laundering and counter-terrorism legislation to retain information relating to personal identity for 7 years.
5. Subject to any legislative requirements, Ishtar will destroy, erase, or make anonymous your personal information when it is no longer required to fulfil the purpose for which it has been collected.
6. If you refuse or fail to provide any requested information, Ishtar may not be able to process any transaction/s for you.

## *Accuracy*

1. Ishtar will make reasonable efforts to ensure that your personal information is sufficiently accurate, complete, and up-to-date to minimise the possibility that inappropriate information may be used to make a decision about you.
2. Ishtar will not routinely update your personal information, unless such a process is necessary to fulfil the purposes for which the information was collected. In accordance with the Client Agreement, you must notify us as soon as possible if any of the information you have provided to us has changed.

## *Safeguards*

1. Ishtar has in place a range of security safeguards to protect your personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification, regardless of the format in which it is held.
2. The methods of protection may depend on the sensitivity of the information and the format in which it is contained. Security measures employed by Ishtar include:

1. physical measures such as locked filing cabinets and restricted access to offices;
2. Ishtar ensures that its staff are aware of the importance of maintaining the confidentiality of personal information.

## **Access**

1. Ishtar, upon your request, will allow you to access your personal information. The requested information shall be provided or made available in a form that is generally understandable.
2. In circumstances where you point out to Ishtar that any information held by us is inaccurate or incomplete, we will take appropriate action to amend the information as required and, if necessary, notify any third party of the correction.
3. There may be circumstances which preclude Ishtar from providing access to some or all of your personal information. Those circumstances could be:
  1. the information may contain references to other individuals;
  2. legal, investigative, security, or commercial proprietary reasons; or
  3. the information is subject to solicitor-client or litigation privilege.
4. Ishtar may be prohibited by law from providing you with access to your personal information. For example, when the disclosure could:
  1. threaten the safety or physical or mental health of an individual other than you;
  2. reasonably be expected to cause immediate or grave harm to your safety;
  3. reveal personal information about another individual; or
  4. contravene another law that prohibits the disclosure.

## **Complaints**

1. Ishtar has procedures in place, to receive and respond to, complaints or inquiries about our policies and practices relating to the handling of personal information.
2. Ishtar takes all complaints seriously and will investigate all complaints.