

## Pup Research Privacy Policy

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Pup Research\* takes your privacy seriously. We will take reasonable steps to protect the personal information we hold about you consistent with the National Privacy Principles in the *Privacy Act 1988* (Cth). Personal information includes any information or opinion, whether true or not, about a person who is identified or whose identity can reasonably be established.

**Collection:** We collect personal information from you through the Pup Research website <http://www.pupresearch.com.au/> (**Site**) when you register as a user or email us. This may include your full name, email address, password, answer to security questions, information to determine whether we agree to provide our services to you, details collected as a consequence of payment methods that you use for your subscription and as a consequence of any other communications between us, and other publicly available information that is collected by common web server and/or mobile device configurations. If you provide us with personal information about another person we must take reasonable steps to ensure that person is aware of this Privacy Policy and may contact them for the purposes of providing to them this Privacy Policy or seek confirmation from you that this Privacy Policy has been provided to them.

Pup Research may also collect personal information from you or from related entities in the course of and for the purposes of providing the Services (as defined in the [Terms of Use](#) ([www.pupresearch.com.au](http://www.pupresearch.com.au))) and the performance of functions associated with our business activities, which are primarily the provision of general investment information services and tools to individuals and businesses including the development of new services and tools.

If you do not provide us with all the information we request from you, we might not be able to provide you with some or all of our services (including the Services) and tools.

**Use:** We will use any information collected for the purposes described above including for the provision of access to and operation of the Site, responding to feedback and complaints, communicating with users, enforcing our [Terms of Use](#) ([www.pupresearch.com.au](http://www.pupresearch.com.au)) and addressing potentially prohibited or illegal activities. You consent to us using your personal information for the purposes of communicating with you to promote new services that we or our related entities may provide to you, although when we do we will give you the option to "unsubscribe" from receiving such further communications.

**Cookies:** When you visit the Site, we will instruct your web browser to create a cookie that will be present for the duration of your session (and may remain indefinitely depending on how you use the website). Only a session ID value will be inside the cookie, which will be used to reference your account server-side. This is used to maintain your session, allowing you to have your own personalised account with us, improve our service, store user preferences, improve search results and track user practices.

**Other company websites:** The Site and our email communications may contain links to other websites. We do not control these websites or any of their content and if you visit these websites, they will be governed by their own terms of use (including privacy policies).

**Disclosure and sharing:** We may disclose your personal information to related entities or third parties who provide services to us in connection with the Site and any other services and tools that we provide.

In doing so, we will require such persons not to hold, use or disclose your personal information in a manner inconsistent with the National Privacy Principles. We will only disclose your personal information to other third parties with your consent or if permitted or authorised to do so by law or if we consider it is reasonably necessary for the prevention, detection, investigation, prosecution or punishment of criminal offences, breaches of law or improper conduct or for the enforcement of law or the preparation and conduct of legal proceedings.

**Data security and quality:** We will take reasonable steps to protect the personal information we collect and hold from misuse, loss and from unauthorised access and modification, and to make sure it is accurate, complete and up-to-date when we collect, use or disclose it. To assist us, please ensure you provide us with your correct details, and let us know if you believe the information we have about you is inaccurate, incomplete or out of date, and we will take reasonable steps to correct the information or give you reasons if we disagree (although we will take reasonable steps to note your claim that the information is inaccurate, incomplete or out of date if requested). You can also update your personal details via the Site. We may take steps to destroy or permanently de-identify information when it is no longer needed for any purpose for which it may be used or disclosed. We may retain and use de-identified information.

**Access, correction and complaints:** You can request, and we will provide you access with, any personal information we hold about you unless we consider a legal exception applies, in which case we will give you reasons for our denial of access. You can also let us know if you have any concerns or complaints about the way we are handling your personal information and we will do all we can to address them. You can do this by emailing us at [info@pupresearch.com.au](mailto:info@pupresearch.com.au). We may charge you for our reasonable costs and expenses that are incurred in providing such access to you.

**Consent:** By registering a User Account, and by ticking the box next to the words "**I confirm that I have read, understood and accept the Terms and Conditions**" (or equivalent or similar), or by otherwise requesting us to provide our services and tools to you, you consent to our collection, use and disclosure of your personal information in accordance with this Privacy Policy.

**Changes to this Policy:** This Privacy Policy is current at the date specified below. We reserve the right to amend or update it at any time and any changes will take effect once they are included on the Site.

**Contact us:** If you have any questions about this Privacy Policy or our privacy practices, please contact us at:

Diogenes Research Pty Ltd  
7/11 Beach St, Port Melbourne, Vic 3207

For further information on privacy go to: [www.privacy.gov.au](http://www.privacy.gov.au)

\*Pup Research is a registered business name of Diogenes Research ABN 24 110 788 497

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