THREADGOLD ADVISORY

Privacy Policy

Last updated 28 September 2026

This policy explains what personal information Threadgold Advisory collects when you visit our website, see our ads, read our newsletter, request a report, book a call or talk to us on social media. It says why we collect it, who we share it with, how we protect it, and what you can do about it.

We have written it in plain English on purpose. If anything is unclear, ask Joel directly. His details are at the end.

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1. Who we are

Threadgold Abrahams Pty Ltd (ABN 46 671 739 549), trading as Threadgold Advisory ("we", "us", "our"), is a private wealth advisory practice in Sydney. Joel Threadgold (Authorised Representative 001297336) provides financial services as an Authorised Representative of River X Financial Services Pty Ltd (ABN 26 674 273 011, AFSL 556458) ("River X").

This policy covers the personal information we collect through our own marketing and communications: the website at threadgoldadvisory.com.au and its subdomains, our email newsletter This Week in Markets, our reports (including What We Hold), our advertising on Meta, Google, YouTube, LinkedIn, TikTok and Reddit, and our social media pages.

If you become a client, your advice file is created and held under River X's licence, and River X's privacy policy applies to that file alongside this one. Where the two say different things about the same information, River X's policy applies to the advice file and this policy applies to everything else.

We are bound by the Australian Privacy Principles in the Privacy Act 1988 (Cth).

2. What we collect

We collect only what we need to do what you have asked, run our marketing and meet our legal obligations. Depending on how you deal with us, that can include:

- **Contact details.** Your name, email address and mobile number, and any company or role you give us.
- **Wholesale investor answers.** Some of our reports are for wholesale investors only. To send them, we ask which wholesale test you meet (for example net assets or income) and ask you to declare it. We record your answer and declaration. We do not ask for account balances or statements through our marketing.
- **Booking details.** When you book a call, the time you chose, the answers you give on the booking form, and any notes you add.
- **Meeting recordings and transcripts.** Online meetings and calls may be recorded and transcribed so Joel can concentrate on the conversation and keep an accurate record. You will be told at the start. Tell Joel if you would rather not be recorded.
- **Messages.** Emails, texts and social media messages or comments you send us, and our replies.

- **Website and advertising data.** Your IP address, device and browser type, the pages you view, the ad or link that brought you here, the time of your visit, and cookie and advertising identifiers. See section 5.
- **SMS verification.** When you request a report we text a six digit code to your mobile to check the number is yours. That check records your mobile number, IP address and the time.
- **Anything else you choose to give us**, for example in a reply to a newsletter or on a call.

You can read our website, watch our videos and follow our social pages without identifying yourself. We need your details only when you ask us for something: the newsletter, a report, a call, or a reply.

Our services are for adults. We do not knowingly collect personal information from anyone under 18.

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3. How we collect it

- **Directly from you**, when you fill in a form on our website, subscribe, book a call, email or text us, or speak with Joel.
- **Automatically**, through cookies, pixels and similar tags on our website and in our emails.
- **From the platforms you use to reach us.** When you message, comment or react on our Meta (Facebook and Instagram), LinkedIn, YouTube or TikTok pages, that platform shows us your public profile name and the content you sent. Those platforms have their own privacy policies for what they collect.
- **From our service providers**, for example a delivery or bounce report from our email system, or a confirmation from our SMS provider.

If you give us information about someone else, for example a partner or family member, please make sure they know you have done so and that they can read this policy.

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4. Why we use it

We use your personal information to:

- send you what you asked for: the newsletter, a report, a booking confirmation or a reply;
- prepare for and follow up a call or meeting with Joel;
- answer your questions and keep a record of what was said;

- tell you about our services, content and events that we think are relevant to you (you can opt out at any time, see section 9);
- run, measure and improve our website, content and advertising;
- check that a report is only sent to people who qualify to receive it;
- keep our records accurate and secure, and detect spam or misuse of our forms;
- meet our legal obligations, including record keeping under the Corporations Act 2001 (Cth) and identity checks under anti money laundering law if you become a client.

We use software, including AI assisted tools, to help draft, summarise and organise our work. Those tools act on our instructions, are covered by section 6, and never make a decision about you on their own.

5. Advertising, cookies and tracking

Our website and emails use cookies and similar tags. A cookie is a small file your browser stores so a website can recognise you between pages and visits. The tags we use are:

TAG	WHAT IT DOES
HubSpot tracking	Remembers your visit, links your form submissions to your contact record, and tells us which pages and emails you opened.
Meta Pixel and Conversions API	Tells Meta that someone who saw one of our ads visited a page, requested a report, subscribed or booked a call, so we can see which ads work and pay for the ones that do. When you submit a form we may also send Meta a hashed (irreversibly encoded) version of your email address or mobile number so it can match that event to the ad you saw. Meta cannot read the original value from the hash.
Google and YouTube	Standard analytics and video embed cookies where our videos or Google tags appear.
LinkedIn Insight Tag	Tells LinkedIn that someone who saw one of our ads visited a page or booked a call, so we can see which ads work.

TikTok Pixel	Tells TikTok that someone who saw one of our ads visited a page or booked a call, so we can see which ads work.
Reddit Pixel	Tells Reddit that someone who saw one of our ads visited a page or booked a call, so we can see which ads work.
SMS verification service	Records the request when you ask for a code, so a code cannot be requested endlessly from one address.

Audiences. We show ads to people who have visited our website, watched our videos or engaged with our pages, and we use a list of existing clients so they are not shown ads meant for new enquirers. We do not upload our client list to advertising platforms to find people who look like our clients.

Your choices. You can block or delete cookies in your browser settings; the website will still work, though some forms may ask you to re-enter details. You can control how Meta uses data from other websites in your Facebook or Instagram ad preferences. Google's controls are at adssettings.google.com.

6. Who we share it with

We do not sell personal information. We share it only with:

- **River X Financial Services**, our licensee, when you become a client, when compliance requires it, or to handle a complaint.
- **Service providers** who run systems for us and act on our instructions. Today they are HubSpot (customer records, email, forms and call bookings), Microsoft 365 (email and calendar), Meta (advertising and measurement), Google (YouTube and analytics), Twilio (SMS verification), Fireflies (meeting transcription), Vercel and Framer (hosting), and AI assisted software providers (drafting and summarising). Each is bound by a contract or terms that do not allow them to use your information for their own purposes.
- **Professional advisers** such as our lawyers, accountants or auditors, where needed.
- **Regulators, courts and law enforcement** where the law requires or permits it, for example ASIC, AUSTRAC or the Office of the Australian Information Commissioner.

If Threadgold Advisory is sold or restructured, your information may be transferred to the new owner, who would have to keep treating it under this policy.

7. Overseas disclosure

Some of the providers in section 6 store or process information outside Australia, mainly in the United States, and in other countries where they operate their systems. Before we use a provider we check that it protects personal information in a way that is consistent with the Australian Privacy Principles, and we use their Australian or regional hosting where it is offered. We remain responsible for your information when it is handled by a provider on our behalf.

8. How we hold and protect it

Your information is held in our customer records system (HubSpot), our Microsoft 365 email and files, and the systems of the providers in section 6. We protect it with access controls, multi factor authentication, encryption in transit, and by giving access only to Joel and the providers who need it to do their job.

We keep marketing information for as long as you are subscribed or in contact with us, and for a reasonable period afterwards so we can honour your opt out and answer any questions. If you become a client, we keep advice records for at least seven years as the Corporations Act requires. When information is no longer needed we delete it or de-identify it.

No system is perfectly secure. If you think your information has been misused, contact Joel straight away.

9. Marketing and opting out

We send marketing only where you have asked for it, for example by subscribing, requesting a report or booking a call, and in line with the Spam Act 2003 (Cth). Every email has an unsubscribe link that works straight away. To stop texts, reply STOP. To stop everything, email Joel and say so. You can still ask for a call or a report later; opting out only stops the messages you did not ask for.

10. Access and correction

You can ask to see the personal information we hold about you, and ask us to correct it if it is wrong or out of date. Email Joel using the details in section 14. We will need to confirm your identity first, and we will respond within 30 days. There is no charge for a straightforward request. If we cannot give you access, for example because it would reveal information about someone else, we will tell you why.

11. Complaints

If you think we have mishandled your personal information, contact Joel first. We will acknowledge your complaint within seven days and aim to resolve it within 30. You can also raise it with River X Financial Services, our licensee, at info@riverx.com.au.

If you are not satisfied with our response, you can complain to the Office of the Australian Information Commissioner at oaic.gov.au or on 1300 363 992.

12. Data breaches

If personal information we hold is lost, or accessed or disclosed without authority, and that is likely to cause serious harm, we will notify the people affected, River X and the Office of the Australian Information Commissioner as the Notifiable Data Breaches scheme requires, and tell you what we recommend you do.

13. Changes to this policy

We update this policy when our systems or the law change. The current version is always the one linked from the footer of threadgoldadvisory.com.au, with the date at the top. If a change materially affects how we use information you have already given us, we will tell you by email.

14. Contact

Joel Threadgold
Threadgold Advisory

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Joel Threadgold (AR 001297336) is an Authorised Representative of River X Financial Services Pty Ltd (ABN 26 674 273 011, AFSL 556458). Floor 31, 123 Pitt Street, Sydney NSW 2000. The information on this website is general in nature and does not take your objectives, financial situation or needs into account. It is not personal financial advice.

Financial Services Guide