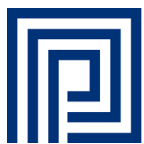


Private Capital Advisers

Privacy Policy

May 2023

Version 12



PRIVATE
CAPITAL
ADVISERS



Contents

Introduction	3
Collection of Information – What is Collected and Why We Collect it	3
Sensitive Information	3
How is Information Collected?	3
Are You Obligated to Provide Us Personal Information?	4
What Happens if We Obtain Information About You Which We Have Not Solicited?	4
Do We Disclose Personal Information for Marketing?	4
Disclosure of Information	5
Government Related Identifiers	5
Cross-Border Disclosure of Personal Information	5
Storage and Security of Information	6
Notifiable Data Breaches	6
Access and Correction of Information	6
Complaints	7
Policy Updates	7

Introduction

This Privacy Policy applies to Private Capital Advisers Pty Ltd, and all its directors and representatives (**we, our, us**). This document explains our policy in relation to the collection and management of personal information we collect from individuals. The Privacy Act 1988 requires us to handle personal information in accordance with the Australian Privacy Principles (**APP**).

Some of our representatives are tax agents therefore they are required to comply with Item 6 of the Code of Professional Conduct outlined in section 30.10 of the Tax Agent Services Act 2009 which prohibits us from disclosing any information relating to your affairs to a third party without your prior consent.

Collection of Information – What is Collected and Why We Collect it

Personal information means information, or an opinion about, an identified individual, or an individual who is reasonably identifiable: whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not.

We are an Australian Financial Services Licensee (**AFSL**), as well as an Australian Credit Licensee (**ACL**), Registered Tax Agents and Accountants. When we provide you with financial services, credit services, or tax (financial) advice services, we may be required by the Corporations Act 2001, National Consumer Credit Protection Act 2009, Tax Agents Services Act 2009 and regulatory requirements to seek to obtain certain personal information about you, including, but not limited to, your:

- Name, date of birth, contact details and tax file number.
- Employment details and employment history
- Financial details
- Details of your investment preferences and attitude or tolerance to investment and financial risk
- Information about your financial needs and objectives
- Information about your employment history, employment circumstances, family commitments and social security eligibility.

Sensitive Information

We may also need to collect sensitive information if we organise insurance coverage for you. Sensitive information includes health information, racial information, genetic information, etc.

We will only collect sensitive information that is reasonably necessary for us to perform our functions or activities in advising you and dealing with you and consented to by you.

How is Information Collected?

We collect personal and sensitive information in many ways, including:

- Directly from you such as when you provide the information at meetings, by phone, email, in data collection forms and when you visit our websites or from other parties with whom you instruct us to deal on your behalf.
- Our website may use "cookies". Cookies are small data files that are downloaded from our website and stored on your computer when you visit our website. Cookies are used to allow

us to see which pages and what information is of most interest to visitors to our website, which in turn enables us to improve our offerings to our customers. Your computer's web browser will allow you to configure your computer to refuse to accept cookies. You can also delete cookies from your computer's hard drive at any time. However, please note that doing so may hinder your access to valuable areas of information within our site.

- Indirectly from fund managers, superannuation funds, life insurance companies and other product issuers once you have authorised us to obtain such information or authorised other parties to provide us with this information.

Are You Obligated to Provide Us with Personal Information?

You are not required to provide us with the information that we request or to allow us to collect information from third parties. However, if you choose not to provide us with the information we request, we may not be able to provide you with the services that you have requested from us, and we may elect to terminate our arrangement with you. Importantly, if you provide either inaccurate or incomplete information to us you risk obtaining products or services that may not be appropriate or suitable for your needs and you may risk suffering a financial detriment or financial loss.

What Happens if We Obtain Personal Information About You Which We Have Not Solicited?

Where we receive unsolicited personal information about you, we will consider if we could have collected the information if we had solicited the information. Where we determine that we could have collected the personal information from you, we will treat your personal information in the same manner as if we have solicited the information directly from you. Where we determine that we could not have collected the personal information, we will destroy the information or ensure that the information is de-identified as soon as practicable.

Use of Personal Information

We use your personal information for the primary purpose for which the information was obtained, i.e., for the provision of financial services, credit services, and tax financial (advice) services. As an AFS licensee and ACL holder, that will typically mean for the purpose of:

- Providing financial services, tax (financial) advice services, and credit services to you.
- Implementing investment or risk management recommendations on your behalf.
- Organising credit contracts or consumer leases on your behalf.

We may also use the information for the secondary purpose of:

- Attempting to identify other products and services that may be of interest to you.
- Referring you to our related entities including Private Capital Superannuation Pty Ltd, Private Capital Accountants Pty Ltd and Launchpad Financial Services Pty Ltd.
- Conducting any professional quality control review program.
- Managing our business operations such as maintaining secure IT systems.

Do We Disclose Personal Information for Direct Marketing?

We may use your personal information to offer you products and services that we believe may interest you. We may also disclose your personal information to external associates and service providers who assist us to market our products and services. We will only disclose your personal information (other than sensitive information unless you have consented) if:

- we collected the information from you; and
- if you would reasonably expect us to use or disclose information for that purpose; and
- we provide you with the simple means by which you may easily request not to receive direct marketing communications from us; and
- you have not made such a request to us before.

If you do not want to receive direct marketing offers from us, please inform us by sending an email to admin@privateca.com.au or calling 08 9384 6516.

Disclosure of Personal Information

With your consent, we may disclose your personal information to:

- Our representatives.
- The product issuers of products and services that you have elected to acquire, vary or dispose of by using our assistance.
- Parties who we think are necessary or convenient to provide financial services to you.
- Our external service providers.
- Our related entities include Parkland Partners Pty Ltd and Launchpad Financial Services Pty Ltd.
- Potential purchasers of our business.

For example, personal information may be disclosed to the following parties:

- Product issuers and credit providers to give effect to the recommendations made by us, and other organisations who support the products and services we offer.
- Other parties involved in the administration of your financial/credit products or insurance cover (e.g. custodians, brokers, credit reporting bodies, actuaries, call centres, mail houses, product registries, and any persons who propose to guarantee (or have guaranteed) repayment of any credit provided to you, mortgage insurers, claims assessors etc.).
- Our external service providers (e.g., IT providers, professional advisers, and contractors).
- Government and regulatory authorities and other organisations, as required or authorised by law.
- Our accounting firm.
- Any person considering acquiring, or acquiring, an interest in our business.

Government Related Identifiers

We do not adopt government related identifiers as our own. However, in certain circumstances, we are required to collect government related identifiers such as your tax file number, Medicare number or pension card number. We do not use or disclose government related identifiers other than when required or authorised by or under an Australian law or a court/tribunal order.

Cross-Border Disclosure of Personal Information

We may transfer personal information to related bodies corporate or external service providers in locations outside Australia, including, but not limited to India, Malaysia, the Philippines, and Vietnam, in the course of storing that personal information and when using or disclosing it for one of the purposes referred to above. When transferring personal information to foreign jurisdictions, we will ensure that we satisfy one of the requirements below:

- we will take reasonable steps to ensure the overseas recipient does not breach the APP (other than APP 1) in relation to the information by entering into contractual agreements with the overseas recipient that requires the overseas recipient to comply with the APP, other than APP 1;
- we form a reasonable belief that the overseas recipient is subject to a law, or binding scheme, that has the effect of protecting the information in a way that, overall, is at least substantially similar to how the APP protect the information and there are mechanisms that the individual can access to take action to enforce that protection of the law or binding scheme; or
- we will seek your informed consent before disclosing your information overseas. Most of the services that we provide are based on an integrated model of professional and reliable service providers that we have selected after thorough due diligence. If you do not agree to us disclosing your information outside Australia to our external service providers, we will not be able to provide services to you.

Storage and Security of Personal Information

We store personal information in our computer database and hard copy files. We take reasonable steps to ensure the personal information collected and held by us is protected from misuse, interference, loss, unauthorised access, modification, or disclosure.

In the event you cease to be a client of ours, any personal information which we hold about you will be maintained for not less than 7 years to comply with legislative and professional requirements.

Notifiable Data Breaches

We are required to notify you and the Information Commissioner of an eligible data breach. An eligible data breach happens if:

- there is unauthorised access to, unauthorised disclosure of, or loss of personal information held by us; and
- the access, disclosure or loss is likely to result in serious harm to you.

If you receive a notification from us of an eligible data breach, you should read and implement the steps recommended to you.

Access and Correction of Personal Information

You may request access to the personal information we hold about you, and we will respond within a reasonable period after the request is made. Where we provide you access to such information, we may charge a reasonable fee to cover our costs. We will disclose the amount of such costs to you before providing you with the information.

We will take reasonable steps to ensure that the personal information that we collect, use or disclose is accurate, up-to-date, complete and relevant. If you become aware or believe, that any personal information which we hold about you is inaccurate or incomplete, you may contact us to correct the information. We do not charge you to correct your personal information.

If we disagree about the correction, you have supplied and refuse to correct the personal information, or if we believe that we are unable to comply with your request to access the personal information that you have provided us, we will give you a written notice of that effect. You have a right to make a complaint if you disagree with our decisions about these matters (see below).

Complaints

If you believe that we have breached the APP or disagree with a decision that we have made about our Privacy Policy, you may complain to us. To enable us to understand and deal with your complaint in a timely fashion you should set out a brief description of your privacy problem, the reason for your complaint and what action or remedy you are seeking from us.

Please address your complaint to the Privacy Officer at PO Box 183, Cottesloe WA 6911.

Your complaint will be investigated and responded to within 30 days. If you are not satisfied with the outcome of your complaint, you are entitled to contact the Office of the Australian Information Commissioner.

Policy Updates

This Policy is subject to change from time to time. The most current version of our Privacy Policy can be obtained from our website www.privatecapitaladvisers.com.au or by contacting us.