

## Privacy Policy

Collins St Asset Management Pty Ltd (ACN 601 897 974) and its related bodies corporate (**we, our, us**) is an Australian financial services licensee (no. 468935). We recognise the importance of protecting the privacy and the rights of individuals in relation to their personal information. This document is our Privacy Policy and it tells you how we collect and manage personal information about you.

We respect our clients' (**you, your**) rights to privacy under the *Privacy Act 1988 (Cth)* (**Act**) and, to the extent required by the Act, we comply with all of the Act's requirements in respect of the collection, management and disclosure of your personal information.

This Privacy Policy tells you how we deal with personal information we may collect about you. The Privacy Policy should be read subject to any overriding provision of law and contract.

When you apply or accept any of our products or services, or provide us otherwise with your personal information, you are agreeing that we collect, hold, use and disclose your information as set out in the Privacy Policy.

### What is personal information?

When used in this Privacy Policy, the term "personal information" has the meaning given to it in the Act. Under the Act personal information means:

*information or an opinion about an identified individual, or an individual who is reasonably identifiable:*

- (a) *whether the information or opinion is true or not; and*
- (b) *whether the information or opinion is recorded in a material form or not.*

### What personal information do we collect and hold?

We may collect and hold the following types of personal information:

- your name, address, email address, telephone number, age or date of birth and any other identifying information contained in documents you may provide to us as proof of you identity (e.g. a driver's licence or passport);
- your occupation or job title;
- your credit card details;
- copies of relevant trust deeds, partnership agreements or company constitutions;
- transactional information you provide to us (e.g. your bank account details);
- details of the products and services you have purchased from us or which you have enquired about, together with any additional information necessary to deliver those products and services and to respond to enquiries;
- any additional information relating to you that is provided to us directly through our websites or indirectly through use of our websites or online presence, through our representatives or otherwise; and
- correspondences between you and us and information which you provide when corresponding with us.

## How do we collect personal information?

We collect personal information directly from individuals about whom the information relates unless it is unreasonable or impracticable to do so. When collecting personal information we may collect it in ways including:

- when you complete a form which you provide to us;
- through your access and use of our website;
- from communications between you and us (including for example, from emails and telephone conversations);
- during conversations between individuals and our representatives; or
- through our promotional or marketing activities.

In some circumstances you may need to provide personal information about third parties (e.g. when making a purchase with someone else's credit card details). When this occurs, we rely on the person giving the information to inform the third party that they are providing the personal information to us and to advise the third party that we can be contacted for further information.

We may also collect personal information from third parties including from third party companies such as credit reporting agencies, law enforcement agencies and other government entities.

## Cookies

In some cases we may also collect personal information through the use of cookies. When you access our website, we may send a "cookie" (which is a small summary file containing a unique ID number) to your computer. This enables us to recognise your computer and greet you each time you visit our website without bothering you with a request to register. It also enables us to keep track of products or services you view so that, if you consent, we can send you news about those products or services. By using cookies we can remember your personalised settings. We also use cookies to measure traffic patterns, to determine which areas of our website have been visited and to measure transaction patterns in the aggregate. We use this to research our users' habits so that we can improve our online products and services. Our cookies do not collect personal information.

If you do not wish to receive cookies, you can set your browser so that your computer does not accept them. Please note this does not opt you out of being sent marketing materials. You will continue to receive generic advertisements on our website even if you do not allow your computer to accept cookies.

We may log IP addresses (that is, the electronic addresses of computers connected to the internet) to analyse trends, administer the website, track users movements, and gather broad demographic information.

## What happens if we don't collect personal information?

If a person does not provide us with the personal information described above, some or all of the following may happen:

- we may not be able to provide the requested products or services, either to our usual standard or at all;
- we may not be able to provide information about products and services;
- we may not be able to provide updates and other information about products and services previously purchased; and
- we may be unable to tailor the content of our websites.

## Security

We take reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorised access, modification or disclosure. We may hold your information in either electronic or hard copy form. Personal information is destroyed or de-identified when no longer needed and no longer required under law to be maintained.

As our website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

## For what purposes do we collect, hold, use and disclose personal information?

We collect, hold, use and disclose personal information for the following purposes:

- to provide products and services to you and to establish and manage your investments;
- to contact you when you so request, and provide you with information you have requested;
- to process communications you send us and to send you communications;
- to answer enquiries and provide information or advice about existing and new opportunities;
- to provide access to protected areas of our website;
- to verify your identity and to get in contact with you if we need to;
- to conduct appropriate checks for fraud;
- to conduct internal research to improve the way we provide service to our clients, including assessing and improving the performance of our website;
- to conduct business processing functions including providing personal information to our related bodies corporate, contractors, service providers or other third parties;
- for the administrative, marketing (including direct marketing), planning, product or service development, quality control and research purposes;
- to update our records;
- to process and respond to complaints;
- to comply with laws and our legal obligations; and
- any other purposes identified at the time of collecting personal information, and anything you authorise us to do.

Personal information we collect will not be shared, sold, rented or disclosed other than as described in this Privacy Policy.

## To whom do we disclose personal information?

We may disclose personal information to:

- our employees and related bodies corporate;
- our custodian and administrative service provider with whom we work to provide our services and products;
- other contractors or service providers, for the purposes of operation of our website or our business and to otherwise provide products and services including, without limitation, web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants;
- third parties with whom we have commercial relationships, for business, marketing, and related purposes;
- regulatory bodies, government agencies and law enforcement bodies in any jurisdiction as required by law;
- other third parties as required or authorised by law;
- third parties such as a complaint body to whom a complaint relating to a product or service is referred, any party inquiring an interest in our business and anyone acting on your behalf; and
- any person or organisation for any authorised purpose with your express consent.

We may combine or share any information that we collect with information collected by any of our related bodies corporate (within Australia).

## Credit card details

We do not store credit card details anywhere on our database. If a customer opts to process the payment of a product in a single amount their credit card details are destroyed as soon as the payment has been processed. However, if a customer chooses to pay in instalments the company uses a token number and credit card details are not held by us. The credit card details we hold are: the name on the card, expiry date and the masked version of the code

## Direct marketing materials

We may send you direct marketing communications and information about our products and services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS, fax and email, in accordance with applicable marketing laws, such as the *Spam Act 2003* (Cth). If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so.

At any time you may opt-out of receiving marketing communications from us by contacting us (see the details below) or by using opt-out facilities provided in the marketing communications and we will then ensure that your name is removed from our mailing list.

We do not provide personal information to other organisations for the purposes of direct marketing.

## How can you access and correct personal information we hold about you?

You may request access to any personal information we hold about you at any time by contacting us (see the contact details below). Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you). We may charge you a fee to cover our administrative and other reasonable costs in providing the information to you. We will not charge you for simply making the request and will not charge you for making any corrections to your personal information.

There may be instances where we cannot grant you access to the personal information we hold about you. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment then we will add a note to the personal information stating that you disagree with it.

### **What is the process for complaining about a breach of privacy?**

If you believe that your privacy has been interfered with, please contact us using the contact information below and provide details of the incident so that we can investigate it.

### **Do we disclose personal information to anyone outside Australia?**

We may disclose personal information to our data hosting and other IT service providers which include personnel located outside of Australia, however your personal information will be held and managed within Australia by Australian personnel.

### **Changes to this Privacy Policy**

We may amend this Privacy Policy from time to time. If we amend this Privacy Policy, the amended Privacy Policy will be made available on our website. You are invited to review this Privacy Policy from time to time.

### **Contacting us**

If you have any questions about this Privacy Policy, any concerns or a complaint regarding the treatment of your privacy or a possible breach of your privacy, please use the contact link on our website or the contact details set out below.

We will treat your requests or complaints confidentially. Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in timely and appropriate manner.

Please contact:

Michael Goldberg (Executive Director)  
Collins St Asset Management Pty Ltd (ACN 601 897 974)  
Level 3 430 Little Collins St  
Melbourne VIC 3000

This Privacy Policy was last updated on 25 November 2020.

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