

PRIVACY POLICY

Background

This Privacy Policy is an important document and outlines our policy on handling the personal information that we collect about individuals including customers and potential customers.

Astute Capital Management Pty Ltd (ABN: 44 641 545 084, AFSL: 523 785) is referred to within this policy as 'the Licensees', 'we' or 'us' or 'our'. Where these terms appear in this document you should associate it with the entity named above who provided this policy to you.

We are committed to protecting your privacy in accordance with the Privacy Act 1988 (Cth) ('Privacy Act'). This Privacy Policy describes our policies and practices in relation to how we can collect, use, store and disclose your personal information.

Collection and storage of personal information

By 'personal information', we mean any details about you, from which your identity is apparent or can be uncovered. At times it may be necessary for us to collect and hold personal or sensitive Information from you. The purpose of collecting personal information is to facilitate financial planning, provision of financial products or services, insurance policies or related services, and to update our records.

In collecting this information, we will take reasonable steps to inform individuals as to:

- Why we are collecting that personal information;
- Who else we might disclose that personal information to;
- What may happen if individuals do not provide personal information to us;
- How to gain access to that information

Generally, we will not collect sensitive information about you unless we required to do so by law or unless you provide consent. 'sensitive information' includes information about your race or ethnicity, political opinions, criminal record, sexual information or biometric information. However, we may collect sensitive information from you in relation to religious beliefs or affiliations and other health, medical or genetic information if it will have an impact on the services we provide to you.

We will only use sensitive information for the purposes for which it was provided, unless you agree otherwise or the use or disclosure of this information is permitted by law.

Documents asking for sensitive information will explain this and we will only collect sensitive information from you where reasonably necessary for us to provide a service to you and with

your consent, or in limited other circumstances specified under the Privacy Act or under the Corporations Act 2001 (Cth) ('Corporations Act').

How do we collect your personal information?

Generally, we collect your personal information directly from you. We could do this in a number of ways, including through face to face interviews, email correspondence and other online mediums.

We may also collect personal information about you from third parties such as:

- Referral partners; and
- Other organisations, service providers or business partners who provide you with products or services along with us.

Why we collect personal information

Pursuant to the Corporations Act we are required to collect sufficient information to ensure appropriate advice can be given in respect of recommendations made to our clients. If you elect not to provide us with the personal information you may be exposed to higher risks in respect of the recommendations made to you and this may affect the adequacy or appropriateness of advice given to you. Alternatively, we may elect to terminate our relationship with you if we believe we are unable to provide you with adequate service.

Other purposes for which we are required to collect your personal information include:

- Verifying your identity for anti-money laundering and counter-terrorism financing purposes;
- Managing your ongoing requirements, our ongoing relationship with you and to improve our services;
- Internal functions such as administration, accounting and information technology system requirements;
- Complying with legal and regulatory requirements,
- In order to prevent fraud or crime;
- Sending you offers, updates, articles, newsletters or other information about products and services that we believe will be of interest to you. You may opt out of this at any time by getting in contact with us;
- Enhancing customer service and product options;
- Handling complaints; and
- Giving you educational information, newsletters or opportunities that we believe may be relevant to your financial needs and circumstances.

Types of personal information we collect and store

- Name, address, date of birth and phone number;
- Details of your financial needs and objectives;

- Details of your investment preferences and risk tolerance;
- Details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, etc;
- Information about your employment history, employment circumstances, family structure, commitments and social security eligibility;
- Any other relevant information including medical history and/or reports required for the purposes of risk insurance.

Disclosure of personal information

We will not use or disclose personal information collected by us for any purpose other than to perform the professional services you have contracted us to do. We will not use it for anything other than:

- The purposes for which it was provided or secondary related purposes in circumstances where you would reasonably expect such use or disclosure; or
- Where you have consented to such disclosure; or
- Where we are required or authorised under law, in circumstances relating to public health and safety and in connection with certain operations by or on behalf of an enforcement body.

Depending on the product or service concerned and particular restrictions on sensitive information, this means that personal information may be disclosed to:

- Other areas within our group who provide financial and related services;
- Financial planners, credit providers and brokers and those who are authorised by us;
- Service providers and specialist advisers to us who have been contracted to provide us with administrative, financial, insurance, accounting, legal, information technology, research or other services;
- Other insurers, credit providers, courts, tribunals and regulatory authorities as agreed or authorised by law;
- Credit reporting or reference agencies or insurance investigators;
- AUSTRAC, the government agency who oversees Anti Money Laundering and Counter Terrorism Financing;
- External dispute resolution bodies to handle your complaint; and
- Other companies in the event of a corporate sale, merger, reorganisation, dissolution or similar event.

Additionally:

- We may be required to make certain information available for inspection by Professional Associations which we or our Authorised Representatives are members of, as part of ongoing compliance with standards. This may involve the disclosure of your personal information.

- We are also obliged pursuant to the Corporations Act to maintain certain transaction records and make those records available for inspection by the Australian Securities and Investments Commission.
- We may disclose your personal information to superannuation fund trustees, insurance providers, credit providers and product issuers for the purpose of giving effect to your financial plan and the recommendations made by us.
- In order to ensure that you receive a personal and tailored service, your personal information may be transferred to one of our agents or representatives who will be your primary point of contact.

It is a condition of our agreement with each of our representatives that they adopt and adhere to this Privacy Policy. If you have any concerns in this regard, you should contact us by any of the methods detailed below.

Generally, we require that organisations outside our group who handle or obtain personal information as service providers acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with the privacy law.

Do we send personal information to overseas recipients?

Some of the entities that we share information with may be located in, or have operations in, other countries. This means that your information might be stored or accessed in overseas countries, including but not limited to New Zealand, Sri Lanka, Singapore, United Kingdom, Philippines, India and the United States of America. Details of the countries we disclose to you may change from time to time. You can contact us for further details regarding where we may send your personal information.

Personal information may also be processed by staff or by other third parties operating outside Australia who work for us or for one of our suppliers, agents, partners or related companies.

When we send information overseas, we will take reasonable steps to ensure that overseas providers do not breach the Privacy Act and that any third parties are subject to a similar level of protection or similar obligations that are offered by the Privacy Act. If you do not agree to the transfer of your personal information outside Australia, please contact us.

Some of our financial advisers may enter their own outsourcing arrangements to countries other than those detailed above. Those arrangements will be disclosed separately by the financial adviser to their clients.

Storing and protecting your information

We strive to maintain the relevance, reliability, accuracy, completeness and currency of the personal information we hold and to protect its privacy and security.

We generally keep personal information for up to 7 years from the date our financial advice was provided to you or for as long as is reasonably necessary for the purpose for which it was collected or to comply with any applicable legal or ethical reporting or document retention requirements. We will destroy or de-identify your personal information when it is no longer required.

We hold the information we collect from you in physical and electronic records, which may be stored at our premises or in secure data centres or in the cloud.

We take reasonable steps to protect the information we retain from misuse, loss and from unauthorised access, modification or disclosure.

We also instruct our staff and Authorised Representatives to respect confidentiality, adhere to policies and obey the law. Transgressions are reported and dealt with as required by the law.

Access and correction

You may have the right to access and request corrections of the Personal Information held by us. This right of access is subject to some exceptions permitted by law.

We will not provide you access to personal information which would reveal any confidential information or the detail of any in-house evaluative decision making process, but may instead provide you with the result of the decision making process or an explanation of that result.

We reserve the right to charge a reasonable fee for searching for and providing access to your personal information. In the event we refuse you access to your personal information, we will provide you with an explanation for the refusal.

We will endeavour to ensure that at all times the personal information about you that we hold is up to date and accurate. The accuracy of the personal information is dependant to a large degree on the information you provide and you should advise us if there are any errors in your personal information.

Collecting through our website

Data - We collect information about the use of our website, for example when you browse our website our service provider logs your IP address, the date and time of your visit, the pages and links accessed, time spent on pages, videos watched and emails opened. We use this information for statistical purposes and to improve the content and functionality of our website, to better understand our website users and markets and to improve our services.

Cookies – In order to collect this data we use “cookies”. Cookies are small pieces of information which are sent to your browser and stored on your computer’s hard drive. Sometimes they identify users where the website requires information to be retained from one page to the next. This is purely to increase the functionality of the site. Cookies by themselves cannot be used to discover the identity of the user. Cookies do not damage your computer and you can set your browser to not accept cookies or notify you when you receive a cookie so that you can decide if you want to accept it. They allow the website to recognise your computer when you return in the future.

Analytics - Google analytics marketing features are active on this website. Cookies are used for marketing analysis purposes, so that Google can provide more relevant advertising through its channels. We will not identify users or facilitate the merging of personally identifiable information with non-personally identifiable information collected through any Google advertising product or

feature. You can opt-out of the Google Analytics Advertising Features we use, through Ads Settings, Ad Settings for mobile apps, or any other available means, including the "Google Analytics opt-out browser ad-on" which can be found here:

<https://tools.google.com/dlpage/gaoptout/> .

How can you contact us about privacy?

You can contact us at

Astute Capital Management Pty Ltd

PO Box 399

COMO WA 6952

Or email to admin@astutecapital.com.au

Or phone on 0407 388 023

Correspondence should be addressed for the attention of the Privacy Officer. Please ensure that you provide sufficient information for us to be able to contact you if we require clarification of the matters that you raise.

If you wish to contact us to complain about any breach or potential breach of this privacy policy or the Australian Privacy Principles, in most cases we will contact you within five working days of receipt of your complaint to let you know what action we are taking regarding your complaint.

Alternatively, you can contact the Office of the Australian Information Commissioner, on 1300 363 992 or online at www.oaic.gov.au.

If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.

About this policy

This policy is effective as of 17th September 2020 We will update this policy as and when required and post the updated policy on our website at www.astutecapital.com.au