

# Privacy Policy

## Our Commitment to Privacy

Euroz Hartleys Limited ('Euroz Hartleys') (ABN 33 104 195 057) is an Australian Financial Services Licensee (No.230052) and a full-service investment advisory company that complies with the Australian Privacy Principles, as enforced by the Privacy Act 1988 ('Privacy Act'). Our Wealth Management Division provides proficient, personalised service and where possible we provide advice based in a comprehensive knowledge of our clients' needs. Our commitment to protecting your personal details is an integral part of our business operations.

## Types of Personal Information

We collect and hold personal information that is pertinent to the product or service that is provided to you. The types of personal information that we collect is dependent upon the nature of the account being opened. This varies for individual accounts, partnerships, company accounts, institutional accounts, superannuation funds, trusts and so forth. The personal information that is required is inclusive of, but not limited to, personal contact details; birthdate(s); originally certified copies of identification; employment information; financial details; risk profile(s); Tax File Numbers; shareholding details; spouse and dependent details; bank account information; and insurance details. In addition, the type of personal information that we collate is in accordance with the Anti-Money Laundering/Counter Terrorism Financing Act 2006, the Privacy Act, the Corporations Act 2001 and all other relevant legislation.

## Collection and Storage of Personal Information

We are required to protect personal information from misuse, interference, loss, unauthorised access, modification, and disclosure. As such, we collect and store personal information in a secure office with restricted access.

The steps that we take to ensure your personal information is protected, encompass steps such as access control measures; security keys; controlled drives; back up procedures; and physically secured cabinets. Electronic copies of personal information are also stored on a protected client management system that requires user logins and passwords. Computer and network security is regularly monitored and maintained, in addition to virus monitoring.

## Purposes of Collecting, Using and Disclosing Information

Euroz Hartleys will use the personal information that we collect to provide you with the required product or service and to manage, administer and enhance the product or service provided.

From time to time, we may communicate additional information to you such as, market updates or information about products or services deemed relevant to your financial needs. Where the information is for marketing purposes and is not relevant to your financial needs, you will be given the opportunity to elect not to receive any further such communication.

Occasionally, we may disclose information to a third party organisation if the party is contracted to us for the purpose of providing an administrative function, or activity on our behalf, or if they provide one of the financial products or services we offer. Where the organisation is providing a product or service on our behalf, the organisation will usually be named in the form used to collect the information or any accompanying documentation. We may also need to disclose information to any financial institution you have nominated, other Australian Financial Services Licensees, share registries, the Clearing House Electronic Subregister System (CHES) and the Australian Securities Exchange (ASX) for the purpose of completing transactions on your

behalf. We will not disclose any personal information to overseas recipients, other than those stated above.

Your information may also be released to the Australian Securities and Investments Commission (ASIC), the ASX, the Australian Transaction Reports and Analysis Centre (AUSTRAC), or any other governmental agency if required by law, or to a court if required by subpoena, or notice. Relevant information may also be disclosed to a credit reporting agency, or the Financial Services Protection Limited and credit reports may be obtained about you from a credit reporting agency, in connection with the establishment of these arrangements and the collection of any overdue payments.

## Your Right to Access or Correct Your Information

You are entitled to access and correct your personal information that we maintain. If you would like to access the personal information that we hold about you, or obtain a copy of our detailed Privacy Policy, simply contact our Privacy Officer at Euroz Hartleys, GPO Box 2777, Perth WA 6000 or 08 9268

2888. Upon accessing this information, if any information is inaccurate, incomplete or out-of-date, then please request to alter this information.

## Making a complaint

Euroz Hartleys is committed to protecting the privacy of your information; however, should you have a complaint about the handling of your personal information by Euroz Hartleys, you should take the following steps:

1. Contact the Privacy Officer at Euroz Hartleys and inform the Officer about your complaint in writing. If you have not received a satisfactory response, or if thirty days has elapsed, you may refer the matter to the Office of the Australian Information Commissioner (OAIC).
2. Under the Privacy Act you can make a complaint to the OAIC about the handling of your personal information by Euroz Hartleys. The complaint is to be in writing and the service is free of charge. The OAIC recommends that you complete the Privacy Complaint form/template online, which can be accessed via the following website link <http://www.oaic.gov.au/privacy/privacy-complaints>. The complaint may be submitted via mail, fax, email or online. Contact the Director of Compliance (Investigations) at GPO Box 5218, Sydney NSW 2001; email [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au); or facsimile: +61 2 9284 9666

## Other Communication

Please tick this box if you do not want to be sent marketing information on products, services or special offers that are not related to the services we currently provide you.

Please DO NOT send me marketing information on products, services or special offers that are not related to the services you have currently offered.