



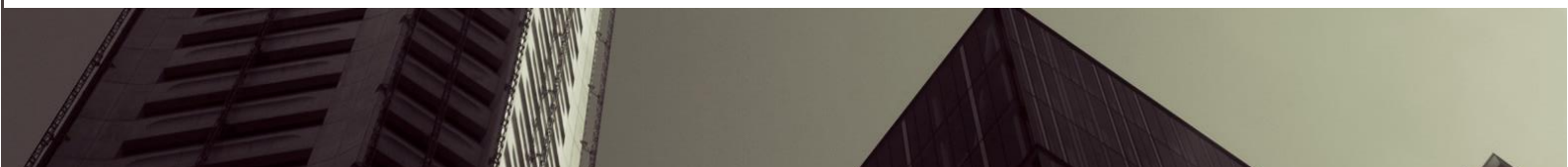
LIPMAN BURGON & PARTNERS

PRIVACY POLICY

We protect legacies, and
help create new ones.



FINANCIAL ADVICE & PORTFOLIO MANAGEMENT



1. Lipman Burgon & Partners Pty Ltd is subject to the Australian Privacy Principles established under the Privacy Act 1988, and to the extent that it applies to our activities, the European Union General Data Protection Regulation (“GDPR”). A summary of the Australian Privacy Principles is available on the website of the Office of the Australian Information Commission, www.oaic.gov.au.
2. This Privacy Policy applies to Lipman Burgon & Partners Pty Ltd (“we”, “us” or “our”) and the personal and credit information (jointly referred to in this policy as “personal information”) we collect and hold.
3. Personal information is information or an opinion about an individual that is reasonably identifiable. For example, this may include your name, email address and contact details.
4. Credit information is personal information that is collected in connection with a credit application. For example, this may include ID information, default information or repayment history information.
5. By providing your personal information to us, you consent to us collecting, using and disclosing your personal information in accordance with this Privacy Policy.
6. We may change this Privacy Policy from time to time by publishing changes to it on our website. Please check our website regularly to ensure that you are aware of any changes to this Privacy Policy.

What personal information do we collect?

7. As a financial planning organisation we are subject to certain legislative and regulatory requirements, which necessitate us obtaining and holding detailed personal information about clients. In addition, our ability to provide clients with a comprehensive financial planning and advice service is dependent on us obtaining certain personal information about those clients.
8. The information we may collect and hold about our clients include:
 - (a) Contact information, including name, residential/postal address, email address, telephone number, date of birth and information about your dependents or family members;
 - (b) IP address information;
 - (c) Financial information, including bank account details, credit or debit card details
 - (d) Details of your financial needs and objectives;
 - (e) Details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, insurance cover and superannuation;
 - (f) Details of your investment preferences and aversion or tolerance to risk;
 - (g) Information about your employment history, employment circumstances, family commitments and social security eligibility; and
 - (h) Details of your personal, investment and business objectives in the near and longer terms.
9. When collecting personal information we may collect government identifiers such as tax file numbers or Medicare numbers. We will not use these to group, classify or identify a person. We will destroy or deidentify these numbers if they are not required for any authorised purpose.
10. Failure to provide the personal information referred to above may expose a client to higher risks in respect of the recommendations made to that client and may affect the adequacy or appropriateness of advice we give to that client.
11. As we are required pursuant to the:
 - Corporations Act 2001,
 - Australian Securities and Investment Commissions Act 2001,
 - Anti Money Laundering and Counter Terrorism Financing Act 2006,
 - Taxation Administration Act 1953,
 - Superannuation Guarantee (Administration) Act 1992, and
 - Superannuation (Unclaimed Money and lost members) Act 1999,(as those acts are amended and any associated regulations) to collect sufficient information to ensure appropriate advice can be given in respect of recommendations made to our clients, if a client elects not to provide us with the personal information referred to above, we may elect to terminate our retainer with the client if we believe we are unable to provide the client with a complete service. From time to time other acts may also require or authorise us to collect your personal information.
12. A client has the right to interact anonymously or under a pseudonym. This is not practical with financial services as the services are personal and a client’s id must be verified before any financial transaction is

implemented. If a client is making a general enquiry about a product or service though the client does not need to tell us who they are.

- 13 Generally, the personal information that we may request from you is required to enable us to enter into a contractual agreement with you, is a requirement under the terms of the contractual agreement with you or is required by us to comply with its obligations under applicable laws, such as the Anti-Money Laundering and Terrorism-Financing Act 2006. You are not obliged to provide the personal information we request, however if you do not provide the personal information requested by us, we may not be able to provide you (or the client with which you are associated) with the requested services.

How do we collect personal information?

- 14 We will generally not collect any personal information about a client except when that client has knowingly provided, or authorised a third party to provide, that information to us. However, there may be times where we may collect information about a client from a third party and the client will not be aware of it but the information will be necessary for us to provide the required financial service.
- 15 We may collect personal information about a client from the following third parties:
- a. banks or other financial institutions;
 - b. fund managers;
 - c. superannuation funds;
 - d. life insurance companies;
 - e. other product issuers; and
 - f. Accountants, legal advisers or other professional relationships.
- 16 We may collect information about you, including where you are not our client, but are associated to a client, from that client or from publicly available sources such as registers maintained by the Australian Securities and Investments Commission and ABN Lookup or made available by third parties.
- 17 Generally, collection of your personal information will be effected in either face-to-face interviews, over the telephone, or by way of written communication via mail, email or an online client engagement form. From time to time additional and/or updated personal information may be collected through one or more of those methods.

Purposes for which we collect and use personal information

- 18 We will only collect, maintain, use and disclose personal information about a client if it is necessary for us to adequately provide the services that client has requested, including:
- (a) The preparation of your Statement of Advice;
 - (b) The provision of financial services or credit assistance to you as requested by you or from time to time as we believe appropriate;
 - (c) Making securities, life insurance, superannuation and investment recommendations;
 - (d) Reviewing your Statement of Advice;
 - (e) Reviewing securities, life insurance, superannuation and investment recommendations;
 - (f) The potential dissemination of information to a new Financial Services Licensee in the event a representative changes to such a new licence in accordance to terms of his/her employment;
 - (g) To identify and control or minimise risks to our services;
 - (h) To enable us to monitor suspicious or fraudulent activity in relation to our services;
 - (i) To enforce compliance with our terms;
 - (j) To provide information to representatives and advisors, including lawyers and accountants, to help us comply with legal, accounting, or security requirements; and
 - (k) Where we believe it is necessary to protect our legal rights, interests and the interests of others, including in connection with legal claims, compliance, regulatory and audit functions, prevention of fraud, ensuring data security.
- 19 We will not use or disclose Personal Information collected by us for any purpose other than:
- (a) The purposes for which it was provided or secondary related purposes in circumstances where the client would reasonably expect such use or disclosure;

- (b) Where the client has consented to such disclosure; or
 - (c) Where the Australian Privacy Principles authorise use or disclosure where 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.
- 20 If one of our representatives is a member of a Professional Industry Body that Body may inspect the representative's files to assess that representative's compliance with the Rules of Professional Standards of that Body. This may involve the disclosure of your personal information. We are also obliged pursuant to the Corporations Act to maintain specified records and make those records available for inspection by the Australian Securities and Investments Commission.
- 21 We may use the personal information collected from a client for the purpose of providing that client with direct marketing material such as articles that may be of interest to the client, however the client may, by contacting us (by phone, email or in a face to face meeting), request not to receive such information and we will give effect to that request. We will action a client's request promptly.
- 22 It is our policy that sensitive information will be used and disclosed only for the purposes for which it was provided, unless the customer agrees otherwise or the use or disclosure of this information is allowed by law. Documents asking for sensitive information will explain this.
- 23 Some personal information we hold is 'sensitive' and subject to greater restrictions. Sensitive information relates to a person's racial or ethnic origin, political opinions or membership of political bodies, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association or trade union, sexual preferences or activities, criminal record, state of health and medical history. Some sensitive information is usually needed for applications for death, sickness and disability insurance and to manage claims on those products. It may also be relevant for applications and management of credit as well as for other applications relating to the provision and operation of a financial service or product.
- 24 If you are an individual in the European Union ("EU"), we collect and process information about you only where we have a legal basis for doing so under the GDPR. The legal basis for processing your personal information will depend on the services you use and your relationship with us (for example, whether you are our client or you are a beneficial owner or controlling person of a client). We will only collect and use your personal information where one of the following legal bases apply:
 - 25 it is required to provide you with the relevant products or services in accordance with our agreement with you;
 - (a) it is necessary for the purposes of our legitimate interests (which is not overridden by your data protection interests), including in connection with legal claims, compliance, regulatory and audit functions, prevention of fraud and ensuring data and system security;
 - (b) you have given us consent to do so for a specific purpose; or
 - (c) it is necessary for us to comply with our legal obligations.

When we may disclose personal information

- 26 We may outsource some of the processes involved in providing financial services. Those entities may require access to a client's personal information to carry out those processes on our behalf. We will take reasonable steps to ensure that any such recipient will deal with such personal information in a way that is consistent with the Australian Privacy Principles. Examples of the processes are paraplanning, compliance assessments, direct marketing or data storage. These entities may reside overseas, including in United Kingdom, Europe, the US or Asia regions.
- 27 In order to ensure that a client receives a personal and tailored service, the client's Personal Information may be transferred to one of our agents or representatives who will be that client's primary point of contact with the organisation. It is a condition of our agreement with each of our representatives that they adopt and adhere to this privacy policy. A client can be assured that his or her information will be maintained by any representative in accordance with this policy. If a client has any concerns in this regard, the client should contact us by any of the methods detailed below.
- 28 In the event that we propose to sell our business we may disclose a client's personal information to potential purchasers for the purpose of them conducting due diligence investigations. Any such

disclosure will be made in confidence and it will be a condition of that disclosure that no personal information will be used or disclosed by them. In the event that a sale of our business is affected, we may transfer clients' personal information to the purchaser of the business. Each client's authority, which may be negative consent, will be sought for any such transfer.

- 29 We may disclose a client's Personal Information to superannuation fund trustees, insurance providers, platform operators, credit providers and product issuers for the purpose of giving effect to a loan application or the Statement of Advice and the recommendations made by us.
- 30 We do not disclose any of a client's credit information to credit reporting bodies including for the purpose of requesting a credit check on a client.
- 31 Some of the third parties to which we may disclose your personal information may not have equivalent privacy and data protection laws to the country in which you reside and may not, in the case of individuals located in the EU, be subject to an adequacy decision of the European Commission that the third country ensures an adequate level of protection. We will use our best endeavours to ensure that personal information will receive protection similar to that which it would have if the information were in Australia by implementing standard data protection obligations in its contractual agreements with these overseas service providers. For more information, please contact the Compliance Manager.

Protection of your personal information

- 32 A client's personal information is generally held in that client's file. Information may also be held in a computer database.
- 33 We will at all times seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure. At all times a client's personal information is treated as confidential and any sensitive information is treated as highly confidential. All paper files are stored in lockable cabinets, which are locked out of hours. Access to our premises is controlled. All computer-based information is protected through the use of access passwords on each computer and screen saver passwords. Data is backed up each evening and stored securely, which may include off site.
- 34 In the event that a client ceases to be a client of this organisation, any personal information which we hold about that client will be maintained in a secure storage facility (which maybe off-site) for a period of 7 years in order to comply with legislative and professional requirements, following which time the information will be destroyed.

Requesting access or correction to personal information

- 35 A client may at any time, by contacting us, request access to their personal information and we will reasonably provide access to that information for the client either by providing him or her with copies of the information requested, allowing him or her to inspect the information requested or providing him or her with an accurate summary of the information held. You can also request confirmation from us as to whether we are processing your personal information.
- 36 We will endeavour to ensure that at all times the personal information we hold about a client is up to date and accurate. In the event that you become aware, or believe, that any personal information which we hold about you is inaccurate, incomplete or out-dated, you may contact us and provide to us evidence of the inaccuracy or incompleteness or out-datedness and we will, if we agree that the information requires correcting, take all reasonable steps to correct the information. We must retain historical information to support the services we provided at a point in time.
- 37 If we do not agree that that client's personal information requires correcting, we must, if that client requests, take reasonable steps to ensure that whenever that client's personal information is accessed or handled in the future, it is apparent that the client is not satisfied as to the accuracy or completeness of that information.
- 38 We will endeavour to respond to any request for access or correction within 14-30 days depending on the complexity of the information and/or the request. If a client's request is urgent this needs to be indicated clearly to us.

Data retention

- 39 The period of time for which your information will be retained by us will depend on the types of information we hold about you. Generally, your information will be retained for the period during which you have an ongoing relationship with us and for a period of 7 years after this relationship ceases, or such other period of time as required under specific legislation relating to the type of information held (for example under the Anti-Money Laundering and Terrorism-Financing Act 2006 (Cth)).

Additional rights for individuals located in the EU

- 40 If you are an individual in the EU, you have the following additional rights:
- (a) Erasure of your personal information: You may request erasure of your personal information in certain circumstances. For example, if you believe your personal information is no longer necessary for the purpose which we collected it or if you have withdrawn your consent for us to process your personal information.
 - (b) Restriction or objection to processing personal information: You may request us to restrict or stop the processing of your personal data in certain circumstances. For example, if you believe the personal information we hold is not accurate, if you believe that the data has been unlawfully processed or if we are using your personal information for direct marketing activities.
 - (c) Data portability: You may request us to provide you with a copy of your personal information in a format that you can easily move or provide to another service provider. Your right to data portability applies to some, but not all, of your personal information.
- 41 Requests should be made by in writing and addressed to the Compliance Manager, using the contact details set out below. We may refuse your request, for example if we still have a legitimate business interest in keeping and continuing to process that personal information, if processing of your personal information is necessary to comply with a legal obligation, or if the request is manifestly unfounded or excessive (as applicable). If we deny your request, it will provide its reasons in writing.

Contact us

- 42 If a client wishes to complain about any breach or potential breach of this privacy policy or the Australian Privacy Principles, the client should contact us by any of the methods detailed below and request that the complaint be directed to the Compliance Manager. Your complaint will be considered within 7 days and responded to. It is our intention to use our best endeavours to resolve any complaint to your satisfaction, however if you are unhappy with our response, you are entitled to contact the Office of the Australian Information Commissioner who may investigate your complaint further using the following contact details; GPO Box 5218 Sydney NSW 2001, Phone: 1300 363 992 or www.oaic.gov.au.
- 43 If you are an individual in the EU, you may lodge a complaint with your local data protection supervisory authority within the European Union if your complaint has not been adequately dealt with by us.

CONTACT DETAILS

The Compliance Manager

Address: Level 9, 4 Martin Place Sydney NSW 2000

Telephone: 02) 92309600

Facsimile: 02) 92309666

Email: operations@lipmanburgon.com.au