

Wealth Defender Equities Limited Privacy Policy (Clients, Investors & Website Users)

Wealth Defender Equities Limited ACN 602 517 528 (“**WDE**”) recognise the importance of protecting personal information. This Policy explains how WDE protects the privacy of individuals and summarises how the company collects, uses and discloses personal information about individuals.

WDE is bound to comply with the *Privacy Act 1988* and the Australian Privacy Principles (“**APPs**”) that regulate the handling of personal information about individuals.

1. Management of Personal Information

(a) Information WDE collects

From time to time WDE will collect personal information from clients, investors, financial planners, researches houses and other individuals (for example business contacts, referrers and potential new clients). The type of personal information that may be collected will depend on WDE’ relationship with the person, and the circumstances of collection. Information collected from individuals may include the following:

- name, occupation, date of birth and place of birth;
- residential or business address, email address, facsimile number and contact telephone numbers;
- bank account details and credit/debit card details;
- details about website users through the use of cookies (refer to our website terms and conditions for more information about WDE use of cookies); and
- sensitive Information including government identifiers (such as your tax file number), your nationality, country of birth and professional memberships.

WDE may collect sensitive information from individuals in order to comply with the Anti-Money Laundering and Counter-Terrorism Financing laws.

We may also collect copies of identification documents for example driver licences, birth certificates and/or passports.

If you do not provide or authorise the provision of your personal information, we may be unable to provide you with some or all of our products and services.

(b) How WDE collects information

How we collect personal information will largely depend on whose information we are collecting. If it is reasonable and practical to do so, we will collect personal information directly from you.

We may collect information about you when you:

- register, engage with or subscribe to WDE for the provision of services;
- make an application to invest with us;
- seek advice from us, or request information from us;
- interact or conduct business with WDE;
- telephone, email or write to us; or
- have a face to face meeting with a representative of WDE.

As well as collecting information directly from an individual, there may be occasions when WDE collects information from a third party, which will supplement the information held by WDE.

We may collect personal information from third party stockbrokers, and from share registries who provide share registry, investor communication and voting services, or from independent sources. We will however only collect information from third parties where it is not reasonable and practical to collect the information from you directly.

(c) Gathering and combining personal information

Improvements in technology enable organisations to collect and use personal information to get a more integrated view of investors, and to allow them to provide better products and services to investors.

We may combine investor information made available from a variety of sources. This enables us to analyse the data in order to gain useful insights, which can be used for the purposes mentioned in Section 1(f) of this Privacy Policy.

(d) Unsolicited Information

Sometimes we may be provided with your personal information without having sought it through our normal means of collection. We refer to this as “unsolicited information”. Where we collect unsolicited information we will only hold, use and or disclose that information if we could otherwise do so had we collected it by normal means. If that unsolicited information could not have been collected by normal means then we will destroy, permanently delete or de-identify the information as appropriate.

(e) How WDE stores information

The majority of personal information that investors provide will be sent directly to our share registry, however from time to time personal information is collected, stored and held in a combination of hard copy and electronic client files maintained by WDE.

Personal information is only accessible by officers and employees of WDE (on a need to know basis), unless it is disclosed to another party in accordance with this Policy.

WDE takes all reasonable steps to protect personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure by using industry standard software protection programs.

Our website may contain links to other websites. WDE is not responsible for their privacy practices. Please check their privacy policies.

(f) How is personal information used?

Personal information is used by WDE for the purpose of conducting our business.

Our uses of personal information include but are not limited to:

- establishing your identity;
- managing your investment and our relationship with you;
- providing you with updates in relation to your investment and other investments;

- providing you with one or more of our financial services or products;
- engaging with investors (including calls to investors and emails);
- assessing your application for a financial product or service;
- conducting and improving our business, and improving the investor experience;
- complying with our legal obligations, and assisting government and law enforcement agencies and/or regulators;
- identifying other products and services that we think may be of interest to you; and
- to communicate with you about the products and services that we offer.

We may also need to collect personal and sensitive information in order to comply with our legal obligations, such as the Anti-Money Laundering and Counter-Terrorism Financing laws, under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth).

(g) Direct Marketing

We may use your personal information to engage in direct marketing activities. If you do not want to receive emails and/or other communications from us, you can tell us by contacting us using any of the contact details set out in Section 2 of this Privacy Policy.

(h) Sensitive Information

We only collect sensitive information reasonably necessary for one or more of the uses specified in Section 1(f) of this Privacy Policy if we have the consent of the individuals to whom the sensitive information relates, or if the collection is necessary to lessen or prevent a serious threat to life, health or safety or another permitted general situation (as defined in Section 16A of the *Privacy Act 1988* (Cth)).

(i) Disclosure of information

Personal information may be disclosed to employees and agents of WDE, to enable them to provide services to the client (including advisory and stockbroking services).

It may be necessary for us to disclose your personal information to certain third parties in order to assist us with one or more of our functions or activities, or where permitted or required by law. Third parties may include:

- organisations providing share registry services;
- your financial advisor;
- those to whom we outsource certain functions, for example information technology support;
- agents, professional advisors, auditors and insurers;
- payment system operators and financial institutions;
- government and law enforcement agencies and regulators; and
- entities established to help identify illegal activities and prevent fraud.

We may disclose your personal information from time to time, only if one or more of the following apply:

- you have consented;
- you would reasonably expect us to use or disclose your personal information in this way;
- we are authorised or required to do so by law;
- disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety;
- where another permitted general situation applies (as defined in Section 16A of the Privacy Act 1988 (Cth));
- disclosure is necessary in discharging obligations (such as to foreign governments for the purposes of foreign taxation); or
- disclosure is reasonably necessary for a law enforcement related activity.

(j) Cross-boarder disclosure of personal information

In relation to New Zealand investors, personal information may be disclosed to brokers and authorities located in New Zealand.

We may also transfer personal information to a foreign recipient (including when an overseas entity accesses the information in Australia), only if:

- we reasonably believe that:
 - the recipient is subject to law, or a binding scheme, that has the effect of protecting the information in a way that, overall, is at least substantially similar to the APP's; and
 - there are mechanisms that the individual can access to take action to enforce that protection of the law or binding scheme; or
- the disclosure is required or authorised by or under an Australian law or a court/tribunal order; or
- the transfer is necessary for the performance of a contract with the individual (from which the information was collected); or
- the transfer is for the benefit of the individual (and the other APP requirements are met); or
- if the individual consents to the transfer.

Where disclosure is to be made to a known overseas entity, we will take reasonable steps to assess the privacy laws of the country where information will be disclosed to determine whether the overseas recipient is required to comply with privacy laws that are at least as stringent as the APP requirements in relation to information. We may enter into a written contract with the overseas recipient to enable us to enforce protection of the personal information that we provide to the overseas recipient, and ensure that the overseas entity does not breach the APPs.

(k) Security of information

WDE will take reasonable steps to protect the personal information WDE holds from any misuse, loss, modification, disclosure or unauthorised access. For example, personal

information is retained in secure hard copy and electronic files, and is only accessible by staff on a need to know basis.

(I) Information that is no longer required

If WDE no longer needs the personal information for any purpose for which it may use or disclose the information, and the information does not need to be retained under an Australian law, or court order, WDE will take reasonable steps to destroy or permanently de-identify the information.

2. Who can I contact for further information or to gain access to my personal information or to make a complaint?

(a) Contact Details

Individuals are able to contact WDE and request further information about this Policy, request access to their personal information or make a request that personal information be corrected and/or updated. Individuals are also able to make a complaint about any aspect of this Policy, and/or any aspect regarding the collection or use of information by WDE, including the following:

- the kind of information collected by WDE;
- the collection process;
- the purpose for which information is collected;
- how information is held; or
- use or disclosure of information by WDE.

Further information can be requested, access to information can be requested and complaints can be made using the contact details set out below.

Mail: Wealth Defender Equities Limited
Attention: Privacy Officer
Level 19, 56 Pitt Street
Sydney NSW 2000 Australia

Email: privacy@wealthdefenderequities.com.au

Telephone: +61 2 8274 2700

(b) Request for correction of information

If an individual requests WDE to correct personal information held in respect to that individual, WDE will take such steps (if any) as are reasonable in the circumstances to correct that information to ensure that, having regard to the purpose for which it is held, the information is accurate, up to date, complete, relevant and not misleading.

WDE will respond to a request for correction of personal information within a reasonable period after the request is made. If WDE refuses to correct the personal information as requested by an individual, WDE will provide the individual with a written notice that sets out:

- the reasons for the refusal except to the extent that it would be unreasonable to do so; and
- the mechanisms available to complain about the refusal.

If WDE refuses to correct the personal information, it will keep with the record an indication that the person has requested that the information be corrected.

(c) Complaints

Complaints in relation to this Privacy Policy or the collection of personal information will be investigated by WDE within a reasonable period after the complaint is received. Following an investigation, a response will be provided by WDE to the individual.

If a person is not satisfied with the way in which WDE handles an enquiry or complaint, they can call the Office of the Australian Information Commissioner on 1300 363 992.

3. Update of Privacy Policy

WDE may vary this Policy at any time, as business requirements or the law changes. WDE will review this Policy on a regular basis and update the Policy as required.