

Privacy Policy

Dated: 01 December 2020

Australian Moneymarket Pty Ltd ABN 56 126 032 755 is a corporate authorised representative (No. 338682) of DDH Graham Limited ABN 28 010 639 219 (AFSL No. 226319). Australian Moneymarket Pty Ltd (referred to as "AMM", "our", "we" and "us") recognise that the privacy of your personal information is important to you and is committed to protecting the privacy of any personal information it collects from you. Unless you give us your consent to do otherwise, we will only collect and use your personal information as set out below.

AMM abides by the Australian Privacy Principles ("APPs") under the *Privacy Act 1988* (Cth) ("the Act"). This Privacy Policy outlines how we will handle and manage personal information we collect about you. You can obtain information about the APPs and your privacy rights at the website of the Office of the Australian Information Commissioner at www.oaic.gov.au/privacy-portal/.

Exclusions

This policy relates to our collection and handling of personal information that is covered by the Act; it is not intended to cover categories of personal information not covered by the Act.

What information do we collect?

AMM collects and holds personal information from clients, customers, employees, contractors, financial advisers and other individuals. We collect personal information that is necessary for us to conduct our business. Personal information is any information that can be used to identify you and may include:

- name;
- date of birth;
- citizenship;
- address;
- telephone numbers;
- email address;
- occupation and industry;
- financial information, including assets, income and superannuation details;
- bank account details; and
- tax file number.

Where relevant we may ask you for other information, for example, qualifications and employment history if you are applying for employment with us. We also collect certain sensitive information (such as health information) but only where you have expressly consented to this collection.

How do we collect and hold your personal information?

We usually collect personal information in the following ways:

- directly from you, either in person, in documents, by email, facsimile or via the AMM website. We may also collect information via telephone, where calls we receive from you may be recorded for quality assurance purposes;
- from third parties, such as your employer, financial advisers, stockbrokers, financial institutions or Self-Managed Superannuation Fund administrators, where we have established accounts or other banking facilities in your name, business associates and business counterparties, lessors and solicitors; and
- from publicly available resources.

We hold personal information in hard copy and electronic files.

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Collection of information from the AMM website

When using the AMM website you may voluntarily disclose personal information to us. Our service provider logs the following information for statistical purposes: your server address, top level domain name (eg .com, .gov, .au, .uk, etc.), the date and time of your visit, the pages accessed, the documents downloaded, the previous site visited and the type of browser used. This information is used for internal purposes only and to properly manage our website, including statistical purposes. None of this information specifically identifies an individual.

We will not try to identify users or their browsing activities except as necessary to investigate or report any suspected unlawful activity, as required or authorised by law or as reasonably necessary for the activity of an enforcement body.

Cookies are used on our website. Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work or work more efficiently as well as to provide information (noted above) to the owners of the site.

Unless you have provided it to us otherwise than through the AMM website, we will only record your email address if you send us a message. In those circumstances, your email address will not be automatically added to any mailing list.

For what purposes do we collect personal information and what are the consequences of not providing us with the information requested?

The main purpose for which we collect, hold and use personal information about you are:

- to provide you with a range of products and services, to meet our obligations to you and to enable us to conduct our business;
- to maintain contact with you; and
- as required under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth).

We also collect personal information so you can seek employment with us or communicate with us in writing, by e-mail, telephone or via the AMM website.

If you do not give us the requested personal information, or if the information you give us is incomplete or inaccurate, we may be delayed or prevented from providing you any products or services, carrying out any transactions for you, providing information to you, processing any application or otherwise meeting our obligations to you.

How do we use your personal information?

We use the personal information we collect primarily to provide you with a range of products and services, to meet our obligations to you and to enable us to conduct our business, including:

- administering and reporting to you on a variety of investment solutions, carrying out investments on your behalf as well as managing and reporting to you on your investments;
- providing you with superannuation administration services and insurance claims processing;
- establishing accounts or other banking facilities on your behalf with third party financial institutions, and administering your accounts or other banking facilities;
- negotiating and documenting leases and related decisions; communicating operational matters in relation to tenancies; and arranging for the sale of premises;
- conducting our internal business operations (including meeting any relevant legal requirements);
- managing client relationships and improving the services we provide;
- providing you with information about financial and superannuation products and services or events through our newsletters and other promotional materials;
- providing your appointed financial adviser or authorised third party with information about your investments held through AMM, which may be done through electronic means, such as software-based data feeds; and
- assessing applications for employment.

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To whom do we disclose personal information?

We will only disclose personal information for the purposes for which it was collected or in the following circumstances:

- internally to our staff;
- to any entity owned or controlled by AMM;
- to our related bodies corporate;
- to any person where necessary or desirable in connection with the provision of our products or services, including to financial institutions where we may establish accounts or other banking facilities on your behalf;
- to your appointed financial adviser or authorised third party;
- to our professional advisers such as auditors, accountants and lawyers, insurance companies, property managers, consistent with normal business practices;
- to third parties we may engage from time to time to assist us in the promotion of our products and services, and who may receive limited personal information for that purpose;
- to external service providers in Australia, New Zealand, India and the United Kingdom (on a confidential basis) so they can provide us services related to our business, for example mailing services, IT services, and off-site secure data storage providers. We require our service providers to adhere to our Privacy Policy and not to keep, use or disclose personal information we provide to them for any unauthorised purpose;
- where required or authorised by law; and
- where you consent to the disclosure.

Where applicable we may rely on employee and related bodies corporate exemptions that are available to us under the Act when using or disclosing personal information.

Financial Adviser Information

From time to time, we may use contact information provided to us by financial advisers for marketing and promotional purposes, such as rate sheets, newsletters and other notifications you would reasonably expect from our service. We may also disclose contact information provided to us by financial advisers to third party product providers for the purpose of direct marketing. If at any time you would not like to receive marketing or promotional material from AMM, you can notify us in writing or by clicking the 'Unsubscribe' option on any marketing or promotional material we may send to you by email. If at any time you would not like AMM to disclose your contact information to third party product providers for direct marketing purposes, you can notify us in writing or by opting out at the time of registering as a financial adviser with AMM.

Webinars

Where you sign up to attend one of AMM's live webinars, we will collect personal information from you such as your name and email address. AMM use Zoom Video Communications, Inc. ("Zoom") to present our webinars. If you choose to sign up to a webinar you will be directed to the Zoom website to register, where you will be asked to provide your name and email address. Zoom will then share this information with AMM. Further information regarding Zoom's privacy statement is available from their website <https://zoom.us/privacy>.

We will use this information to send you correspondence relating to the webinar you have registered to attend, such as an accredited certificate of completion for continuing professional development purposes. We may also disclose your name and email address to third party product providers, such as those that are involved with the webinar you have registered to attend, for direct marketing purposes.

If at any time, including prior to the webinar, you would not like AMM to disclose your information to third party product providers for direct marketing purposes, you can notify us by emailing marketing@moneymarket.com.au

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Electronic Verification

To meet our obligations under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth), AMM, with your consent, may use your personal information to verify your identity through the process of electronic verification. We may also perform the same process to re-identify you, from time to time.

We will disclose your personal information to our service providers and external data sources, in order for us to verify your identity by electronic verification. Our service providers will match and exchange your personal information with external data sources, which may include a credit reporting agency. If personal information is disclosed to a credit reporting agency for the purpose of electronically verifying your identity, the credit reporting agency will not record this as an enquiry on your consumer credit report.

For more information regarding electronic verification, please see our Verifying Your Identity Electronically document, which is available on our website.

Cross-border disclosure of personal information

Some of our third-party contractors and service providers may perform certain services overseas. As a result, your personal information may be disclosed to a recipient in a foreign country, including in India, New Zealand and the United Kingdom. For example, we may use external service providers overseas so they can provide us services related to our business, for example mailing services and IT services. Under privacy laws effective from 12 March 2014, we must take reasonable steps, in the circumstances, before personal information is disclosed to an overseas recipient to ensure that the overseas recipient does not breach privacy laws in relation to that information.

How secure and accurate is your personal information?

We will take reasonable steps to ensure that all personal information we collect or use is:

- accurate, complete, up-to-date, relevant and not misleading;
- stored in a secure environment; and
- protected from misuse and loss as well as unauthorised access, modification or disclosure.

If any of your details change, please let us know as soon as possible by using the contact details below so we can maintain the accuracy of your personal information.

Data breach notification

We acknowledge the introduction of a mandatory data breach notification scheme which commenced on 22 February 2018. In the event of an 'eligible data breach' we will promptly notify the Office of the Australian Information Commission and any affected or at-risk individuals. Generally speaking, this would be when we have reasonable grounds to believe that there has been unauthorised access or disclosure of personal information, or that the information has been lost in a way that is likely to give rise to unauthorised access or disclosure. Importantly, we are only required to make a notification where there is a likely risk of serious harm as a result of the unauthorised access or disclosure.

If we notify you of a breach, where possible we will provide recommendations as to the steps you should take regarding the breach.

There are a number of exceptions that apply in relation to our obligation to notify you of an eligible data breach. These include where we have taken sufficient remedial action before any serious harm is caused.

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How can you access and correct your personal information?

You have a right to access personal information we hold about you. We will comply with any request to access your personal information that you send us by emailing admin@moneymarket.com.au, except where the Act or the APPs allow us to refuse to do so. There is no fee for making a request to access your personal information, but we may charge a fee for giving you access to your personal information in a mutually agreed format, usually by sighting the accessible information held on file.

You also have the right to ask us to correct information about you that is inaccurate, incomplete, out-of- date, irrelevant or misleading. If we refuse to correct your personal information as requested, we must:

- notify you in writing of the reasons for the refusal unless it would be unreasonable to do so, and how to complain of the refusal; and
- upon request from you that we associate a statement that the information is inaccurate, incomplete, out-of-date, irrelevant or misleading, take such steps as are as reasonable in the circumstances to associate such a statement so that it will be apparent to users of the information.

AMM links to other websites

Sometimes the AMM website may contain a link to third party websites. We are not responsible for the content or material contained in, or obtained through, any third-party website or for the privacy practices of the third-party website. We suggest that you review the privacy policy of each website that you visit.

How can I contact AMM?

If you have any questions or complaints about how we handle your personal information, you can contact our Privacy Officer, being our Senior Compliance Manager, on 07 3228 2688 during business hours or email compliance@moneymarket.com.au.

We will consider and respond to any complaint notified to us within 30 days. We will always endeavour to resolve any complaint to your satisfaction. Further details about how we handle complaints can be found in our Financial Services Guide.

Australian Privacy Commissioner

If you are not satisfied with the way in which we handle your enquiry or complaint, you can contact the Office of the Australian Privacy Commissioner by visiting their website www.oaic.gov.au

Changes to this Privacy Policy

This is our current Privacy Policy outlining our personal information management practices. This Policy replaces any other privacy policy published by us to date. We may vary this policy from time to time. We encourage you to review the AMM website regularly to ensure that you are aware of our current Privacy Policy.