

# Privacy Policy

## St George Capital Pty Ltd

### Our Commitment

St George Capital is committed to providing you with the highest levels of client service. We recognise that your privacy is very important to you. The Privacy Amendment (Private Sector) Act, 2000 sets out a number of National Privacy Principles (NPPs). Our aim is to both support and ensure that we comply with these principles. Further information on privacy in Australia may be obtained by visiting the website of the Office of the Federal Privacy Commissioner at <http://www.privacy.gov.au>

St George Capital believes that this Privacy Policy discloses how the personal information you provide to us and our representatives, is collected, used, held, disclosed and disseminated. We encourage you to check our website regularly for any updates to our Privacy Policy.

St George Capital is required to meet particular legislative and regulatory requirements under its Australian Financial Services Licence. In order to provide thorough advisory services to you, we are required to collect certain personal information from you.

For the purposes of this Privacy Policy, St George Capital means St George Capital Pty Ltd and related bodies corporate.

### Your Personal Information

As a financial services organisation we are subject to certain legislative and regulatory requirements which necessitate us to obtain personal information about you, which may include:

- Your full name, date of birth, residential address, postal address and telephone and fax numbers
- your position and the organisation you work for
- your email address
- a certificate completed by a qualified accountant to confirm your status as a sophisticated investor.

We will not obtain details of government identifiers, such as your tax file number, Medicare number or pension card number unless you have voluntarily consented to disclose this information to any third party.

### How We Collect Personal Information

St George Capital collects personal information in a number of ways, including:

- directly from you, when you attend a face-to face interview;
- directly from you, when you provide information through a data collection form;
- directly from you, when you provide information by phone;
- directly from you via an email or the internet; and
- directly from other sources once authorisation has been provided by you. You have a right to refuse us authorisation to collect information from a third party.

### How We Use Your Personal Information

Primarily, your personal information is used in order to provide comprehensive and/or limited advisory services to you. We may also use the information that is related to the primary purpose and it is reasonable for you to expect the information to be disclosed.

Should you choose not to provide certain personal information or provide incorrect information, the advice and/or recommendations may be inappropriate or inadequate.

From time to time, we may provide you with direct marketing material. This will include articles and newsletters that may be of interest to you. If, at any time, you do not wish to receive this information any further, you may contact us with this request. We will endeavour to meet your request within 2 weeks. We maintain a Register for those individuals not wanting direct marketing material.

We may disclose your Personal Information to other organisations and/or service providers for the purpose of giving effect to the recommendations made by us.

We also collect information about you for the purpose of reporting to AUSTRAC under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006.

In the event we propose to sell the business, we may disclose your personal information to potential purchasers for the purpose of them conducting due diligence investigations. 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.

## **When We Disclose Your Personal Information**

The Corporations Act has provided the Australian Securities and Investments Commission with the authority to inspect certain personal information that is kept on our files about you.

For the purposes set out above, we may disclose your personal information to organisations outside of our organisation. The organisations to which we disclose information may include:

- compliance consultants to ensure that our representatives are meeting our compliance standards;
- mailing houses;
- your professional advisers, including your solicitor or accountant as authorised by you;
- information technology service providers to manage our IT systems;
- government and regulatory authorities and other organisations, as required or authorised by law;
- another authorised representative of St George Capital if necessary;
- a potential purchaser/organisation involved in the proposed sale of our business for the purpose of due diligence; and
- a new owner of our business that will require the transfer of your personal information.

In addition, our employees and the outsourcing companies/contractors are obliged to respect the confidentiality of any personal information held by us.

You can deal with us anonymously where it is lawful and practicable to do so. For example, if you telephone requesting our postal address.

## **How We Store and Secure Your Personal Information**

We keep your personal information in your client file. These files are accessible to authorised personnel only and are appropriately secured out of hours.

Your personal information may also be held on our computer database. All computer-based information is protected through the use of access passwords. Data is backed up regularly and stored securely off site.

Personal information will be treated as confidential information and sensitive information will be treated highly confidential. Without your consent, we will not collect information about you that reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs or affiliations, membership or trade association, membership of a trade union, details of health, disability, sexual orientation or criminal record. This is subject to some exceptions including:

- the collection is required by law; and
- when the information is necessary for the establishment, exercise or defence of a legal claim.

It is a legislative requirement that we keep all personal information and records for a period of 7 years. Should you cease to be a client of ours, we will maintain your personal information on or off site in a secure manner for 7 years. After this, the information will be destroyed.

## **Ensure Your Personal Information Is Correct**

St George Capital takes all reasonable precautions to ensure that the personal information we collect, use and disclose is accurate, complete and up-to-date. To ensure we can maintain this level of accuracy and completeness, we recommend that you:

- inform us of any errors in your personal information as soon as possible; and
- update us with any changes to your personal information as soon as possible.

## **Access to Your Personal Information**

You have a right to access your personal information, subject to certain exceptions allowed by law. We ask that you provide your request for access in writing (for security reasons) and we will provide you with access to that personal information. Access to the requested personal information may include:

- providing you with copies;
- providing you with the opportunity for inspection; or
- providing you with a summary.

If charges are applicable in providing access to you, we will disclose these charges to you prior to providing you with the information.

We will not provide you with access to your personal information if:

- providing access would pose a serious threat to the life or health of a person;
- providing access would have an unreasonable impact on the privacy of others;
- the request for access is frivolous;
- the information is related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings;
- providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations;
- providing access would be unlawful;
- denying access is required or authorised by or under law;
- providing access would be likely to prejudice certain operations by or on behalf of enforcement body or an enforcement body requests that access not be provided on the grounds of national security.

Should we refuse you access to your personal information, we will provide you with a written explanation for that refusal.

## **Sending Data Overseas**

We will not send any personal information about you overseas unless you consent to this, or we reasonably believe that the other country has privacy laws substantially similar to our own, or we provide the information in other circumstances giving like protection.

## **Complaints Resolutions**

Please contact our Privacy Officer if you wish to complain about any breach or potential breach of your privacy rights. Your complaint will be responded to within 7 days. If you are not satisfied with the outcome of your complaint, you are entitled to contact the Office of the Privacy Commissioner.

## Our Website

St George Capital's website may provide links to third party websites. The use of your information by these third party sites is not within the control of St George Capital and we cannot accept responsibility for the conduct of these organisations.

You may register with us to receive newsletters and other information. By doing so, your name and email address will be collected and stored on our database.

If you do not wish to receive any further information from us, or you wish to update your registration details, please email your request to us. We will endeavour to meet your request within 2 weeks.

Our Website utilises cookies to provide you with a better user experience. Cookies also allow us to identify your browser while you are using our site – they do not identify you. If you do not wish to receive cookies, you can instruct your web browser to refuse them.

### Contact Details

Privacy Officer: **STEPHEN BELBEN**  
Address: **Level 9**  
**105 St Georges Tce PERTH WA 6000**  
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