Privacy Policy + Collection Statement (Privacy Policy)

1. Introduction

Templestone Financial Services Pty Ltd (ACN 641 075 95) (referred to as ***Templestone***, ***we***, ***our***, ***us***) is bound by the *Privacy Act 1988* (***Privacy Act***), including the Australian Privacy Principles (***APPs***), and recognises the importance of ensuring the confidentiality and security of your personal information.

All third parties (including clients, suppliers, sub-contractors, or agents) that have access to or use personal information collected and held by Templestone, must abide by this Privacy Policy and Collection Statement (**Privacy Policy**). Templestone makes this Privacy Policy available free of charge and can be downloaded from its website www.templestone.com.au [1]

In this Privacy Policy:

- ***Disclosure*** of information means providing information to persons outside of Templestone;
- ***Personal information*** means information or an opinion relating to an individual, which can be used to identify that individual;
- ***Senior Manager*** means Templestone's *Senior Manager (Licensing and Compliance)* who is the contact person for questions or complaints regarding Templestone's handling of personal information;
- ***Sensitive information*** is personal information that includes information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences and criminal record, and also includes health information; and
- ***Use*** of information means use of information within Templestone.

2. What kind of personal information do we collect and hold?

In our dealings with you, we may collect and hold a range of personal information about you to provide you with our services, including:

- name;
- address;
- phone numbers;
- email addresses;
- occupation;
- bank account details;
- driver's licence details;
- financial information, including details of:
    - your bank account details;
    - tax file number;

- directorships; and
- other information necessary to comply with Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) laws and obligations;

3. How do we collect personal information?

We generally collect personal information directly from you. For example, personal information will be collected through our application processes, forms and other interactions with you in the course of providing you with access to our financial services, including when you call us or send us correspondence.

We may also collect personal information about you from a third party, such as electronic verification services, referrers, your accountant, bankers and other agencies. If so, we will take reasonable steps to ensure that you are made aware of this Privacy Policy.

We will not collect sensitive information about you without your consent, unless an exemption in the Australian Privacy Principles (APP) applies. These exceptions include if the collection is required or authorised by law, or necessary to take appropriate action in relation to suspected unlawful activity or serious misconduct.

If the personal information we request is not provided by you, we may not be able to provide you with our financial services, or meet your needs appropriately.

We do not give you the option of dealing with us anonymously, or under a pseudonym. This is because it is impractical, and, in most circumstances, illegal for Templestone as an Australian financial services provider to deal with individuals who are not identified.

4. Unsolicited personal information

We may receive unsolicited personal information about you. We destroy or de-identify all unsolicited personal information we receive, unless it is relevant to our purposes for collecting personal information. We may retain additional information we receive about you if it is combined with other information we are required or entitled to collect. If we do this, we will retain the information in the same way we hold your other personal information.

5. Who do we collect personal information about?

The personal information we may collect and hold includes (but is not limited to) personal information about:

- clients;
- potential clients;
- service providers (including operating partners), contractors and suppliers;
- prospective employees, employees and contractors; and
- other 3rd parties

6. Why do we collect and hold personal information?

We may use and disclose the information we collect about you for the following purposes:

- provide you with our products and services;
- review and meet your ongoing needs;
- provide you with information we believe may be relevant or of interest to you;
- let you know about other products or services we offer, send you information about special offers or invite you to events;
- consider any concerns or complaints you may have;
- comply with relevant laws, regulations and other legal obligations;
- help us improve the products and services offered to our customers and enhance our overall business;

We may use and disclose your personal information for any of these purposes. We may also use and disclose your personal information for secondary purposes which are related to the primary purposes set out above, or in other circumstances authorised by the Privacy Act.

Sensitive information will be used and disclosed only for the purpose for which it was provided (or a directly related secondary purpose), unless you agree otherwise, or an exemption in the Privacy Act applies.

7. Who might we disclose personal information to?

We may disclose personal information to:

- an agent, contractor or service provider we engage to carry out our functions and activities, such as our lawyers, accountants, or operating partners;
- organisations involved in a transfer or sale of all or part of our assets or business;
- organisations involved in managing payments, including payment merchants and other financial institutions, such as banks;
- regulatory bodies, government agencies, law enforcement bodies and courts;
- anyone else to whom you authorise us to disclose it or is required by law.

If we disclose your personal information to service providers that perform business activities for us, they may only use your personal information for the specific purpose for which we supply it. We will ensure that all contractual arrangements with third parties adequately address privacy issues, and we will make third parties aware of this Privacy Policy.

8. Sending information overseas

Templestone and its representatives may utilise technology platforms, software applications, cloud-based services and service providers that store, process or transmit information outside Australia.

Where personal information is disclosed to overseas recipients, Templestone takes reasonable steps to ensure that those recipients handle personal information in a manner consistent with applicable privacy obligations and appropriate information security practices.

Where personal information is disclosed to, stored by or processed through overseas service providers, Templestone takes reasonable steps to ensure that those providers handle personal information in a manner consistent with applicable privacy obligations and appropriate information security practices.

The countries in which personal information may be stored, processed or accessed will depend upon the technology services and service providers used from time to time. These countries may include, but

are not limited to, the United States, the United Kingdom, member countries of the European Union and other jurisdictions in which our service providers operate.

By providing personal information to Templestone, you acknowledge that personal information may be disclosed to, stored by or processed through overseas service providers in connection with the provision of our services and the operation of our business.

Where reasonably practicable, Templestone seeks to engage service providers that maintain appropriate privacy, confidentiality and information security safeguards.

9. Management of personal information

We take reasonable steps to protect personal information from misuse, interference, loss and unauthorised access, modification or disclosure.

These measures may include physical, administrative and technological safeguards appropriate to the nature of the information we hold.

While no information security system is completely secure, we take reasonable steps to protect the information we hold and to respond appropriately to any actual or suspected data breach.

10. Direct marketing

We may only use personal information we collect from you for the purposes of direct marketing without your consent if:

- the personal information does not include sensitive information; and
- you would reasonably expect us to use or disclose the information for the purpose of direct marketing; and
- we provide a simple way of opting out of direct marketing; and
- you have not requested to opt out of receiving direct marketing from us.

If we collect personal information about you from a third party, we will only use that information for the purposes of direct marketing if you have consented (or it is impracticable to obtain your consent), and we will provide a simple means by which you can easily request not to receive direct marketing communications from us. We will draw your attention to the fact you may make such a request in our direct marketing communications.

You have the right to request us not to use or disclose your personal information for the purposes of direct marketing, or for the purposes of facilitating direct marketing by other organisations. We must give effect to the request within a reasonable period of time. You may also request that we provide you with the source of their information. If such a request is made, we must notify you of the source of the information free of charge within a reasonable period of time.

11. Identifiers

We do not adopt identifiers assigned by the Government (such as drivers' licence numbers) for our own file recording purposes, unless one of the exemptions in the Privacy Act applies.

12. How do we keep personal information accurate and up-to-date?

We are committed to ensuring that the personal information we collect, use and disclose is relevant, accurate, complete and up-to-date.

We encourage you to contact us to update any personal information we hold about you. If we correct information that has previously been disclosed to another entity, we will notify the other entity within a reasonable period of the correction. Where we are satisfied information is inaccurate, we will take reasonable steps to correct the information within 30 days, unless you agree otherwise. We do not charge you for correcting the information.

13. Accessing your personal information

Subject to the exceptions set out in the Privacy Act, you may gain access to the personal information that we hold about you by contacting the Templestone's Senior Manager (Licensing and Compliance). We will provide access within 30 days of the individual's request. If we refuse to provide the information, we will provide reasons for the refusal.

We will require identity verification and specification of what information is required. An administrative fee for search and photocopying costs may be charged for providing access.

14. Updates to this Privacy Policy

This Privacy Policy will be reviewed from time to time to take account of new laws and technology, and changes to our operations and the business environment.

15. Incidents/Complaints handling/Making a privacy complaint

We have an effective complaints handling process in place to manage privacy risks and issues

The complaints handling process involves:

- identifying (and addressing) any systemic/ongoing compliance problems;
- increasing consumer confidence in our privacy procedures; and
- helping to build and preserve our reputation and business.

You can make a privacy complaint to us about the treatment or handling of your personal information by lodging a complaint with the Senior Manager.

If you have any questions about this Privacy Policy, or wish to make a complaint about how we have handled your personal information, you can lodge a complaint with us in writing by emailing:

> Attn: Senior Manager (Licensing and Compliance)
> compliance@templestone.com.au

If you are not satisfied with our response to your complaint, you can also refer your complaint to the Office of the Australian Information Commissioner by:

- telephoning – 1300 363 992

- writing – Director of Complaints, Office of the Australian Information Commissioner, GPO Box 5218, SYDNEY NSW 2001
- online submission – https://forms.business.gov.au/smartforms/landing.htm?formCode=APC_PC

16. Your rights

This Privacy Policy contains information about how:

- you may access the personal information we hold about you;
- you may seek the correction of your personal information;
- you may ask us to provide an alternative means of identity verification for the purposes of the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth)*;*
- you may complain about a breach of the Privacy Act, including the APPs; and
- we will deal with a privacy complaint.