

Halifax Investment Services Limited Privacy Policy

What is this policy about?

Halifax Investment Services Limited ("Halifax") recognizes the importance of ensuring that its clients have confidence in the way Halifax handles personal information.

This document sets out the policy of Halifax for management of personal information. We are committed to ensuring the privacy of your information and recognise that you are concerned about your privacy and about the confidentiality and security of information that Halifax may hold about you.

This Policy is designed to inform customers of –

- The Halifax Privacy Policy;
- What information we collect and the purposes for which we collect it;
- Use and disclosure of information collected;
- Security of your personal information;
- Gaining access to information we hold about you;
- What to do if you believe the information we hold about you is inaccurate;
- Complaints in relation to privacy; and
- How to contact us.

Halifax is bound by, and committed to the terms of the Privacy Act 1988 (Cth) as amended from time to time and the Australian Privacy Principles. A summary of the Australian Privacy Principles is available by contacting our office.

We reserve the right to update this policy from time to time without notice.

Should you wish to obtain further information about privacy you can do so by visiting the Office of the

Australian Information Commissioner at www.oaic.gov.au

What is Personal Information?

Personal Information is any information about you, that identifies you or by which your identity can reasonably be ascertained.

What kinds of Personal Information do we collect and hold about you?

We must obtain personal information about you so we can provide the most appropriate financial products and services to you, provide information and marketing material to you and satisfy certain legislative and regulatory requirements.

Halifax will also collect any personal information necessary for the purposes of complying with the Anti-Money Laundering and Counter-Terrorism Financing Act 2006.

The information we collect from you will depend on what services we provide to you and may include the following:

- your full name, address and contact details;
- your e-mail address;
- your tax file number;
- bank account details;
- identification and verification information;
- personal financial information about your assets, liabilities, investment preferences and risk profile; and
- details of specific transactions.

If you do not give us your personal information, we may not be able to provide products and services as requested by you.

We will not collect any Personal Information about you except when you have knowingly provided that information to us or authorised a third party to provide that information to us. Generally collection of your Personal Information will be effected in either face-to-face interviews, over the telephone or by completion of a Client Agreement Form. From time to time additional and/or updated Personal Information may be collected through one or more of those methods.

How is Personal Information Collected?

Most information we hold about clients is collected from the Client Services Agreement Form during the account opening process. Information may also be collected over the phone or via the internet during the course of the client's relationship with Halifax. Sometimes, information about an individual is collected from other people or organisations. For example, information about a director of a corporate customer may be obtained from a public record relating to the company.

Regardless of how it is collected, all Personal Information is handled in accordance with this privacy policy.

Use and Disclose of Personal Information i.e. what does Halifax use your Personal Information for?

Halifax uses the Personal Information it holds in order to provide its clients with the services they request. Halifax 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 you would reasonably expect such use or disclosure; or
- b) Where you have 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.

Halifax is required under the Corporations Act to make certain information available for inspection by the Australian Securities and Investments Commission on request to ensure ongoing compliance with licensing and regulatory requirements. This may involve the disclosure of your Personal Information.

Halifax may disclose your Personal Information to market operators and product issuers for the purpose of giving effect to your instructions and the recommendations made by us. Halifax may disclose your Personal Information to external contractors for the following purposes:

- a) Execution, clearing and settlement of financial products transactions;
- b) Accounting for financial products transactions;
- c) Causing statutory audits to be conducted as required by law;
- d) Maintenance and service of our information technology systems; and
- e) In the course of reviews by external consultants.

It is a condition of our agreement with each of our external contractors that they adopt and adhere to this privacy policy. You can be assured that your information will be maintained by any contractor to whom it is disclosed in accordance with this policy. If you have any concerns in this regard, you should contact us by any of the methods detailed below (refer paragraph below entitled "Contact Details").

Halifax may use the Personal Information collected from you for the purpose of providing you with direct marketing material such as research that may be of interest to you, to inform you about new products and services or special offers from time to time. However



you may, by contacting us by any of the methods detailed below, request not to receive such information and we will give effect to that request. Please allow 2 weeks for your request to be actioned.

Often the law requires us to advise you of certain changes to products/ services or regulations. You will continue to receive this information from us even if you choose not to receive direct marketing information from us. We will not disclose your information to any outside parties for the purpose of allowing them to directly market to you.

Document Storage and Security

We will at all times seek to ensure that the Personal Information collected and held by us is protected from misuse, loss, unauthorized access, modification or disclosure. At all times your Personal Information is treated as confidential and any sensitive information is treated as highly confidential and stored securely.

Your Personal Information is generally held in your client file. Information may also be held in a computer database. Halifax will take reasonable steps to ensure that all Personal Information we collect or use is:

- Accurate, complete and up-to-date;
- Stored in a secure environment; and
- Accessed only by authorized personnel for permitted purposes.

If your details change, we ask that you advise us of the change as soon as possible in order that we may maintain accurate records.

Access to Halifax's premises is controlled, with unauthorised persons strictly prohibited from entering dealing rooms. All electronic information is protected by maintaining a certified security capable operating system i.e. access is only granted via suitable passwords on each computer.

In the event you cease to be a client of this organization, any Personal Information which we hold about you will be maintained in a secure offsite storage facility for a period of 7 years in order to comply with legislative and regulatory requirements, following which time the information will be destroyed.



Access to your Personal Information

You may at any time, by contacting Halifax (refer paragraph below entitled “Contact Details”), request access to your Personal Information.

Halifax will (subject to the following exceptions) provide you with access to that information either by:

- Providing you with copies of the information requested;
- Allowing you to inspect the information requested; or
- Providing you with an accurate summary of the information held.
- We will, prior to providing access in accordance with this policy, require you to provide evidence of your identity.

Halifax will not provide you with access to your Personal Information if:

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

In the event we refuse you access to your Personal Information, we will provide reasons.

Correction of Personal Information

Halifax will endeavour to ensure that, at all times, the Personal Information about you (that we hold) is up to date and accurate. In the event that you become aware, or believe, that any Personal Information which Halifax holds about you is inaccurate, incomplete or outdated, you may contact us (refer details below) and provide to Halifax evidence of the inaccuracy or incompleteness. Halifax will, if we agree that the information requires correcting, take all reasonable steps to correct the information.



If Halifax does not agree that your Personal Information requires correcting, Halifax must, at your request, take reasonable steps to ensure that whenever your Personal Information is accessed or handled in the future, it is apparent that you are not satisfied as to the accuracy or completeness of that information. We will endeavour to respond to any request for access within 1-2 weeks, depending on the complexity of the information and/or the request. If your request is urgent please indicate this clearly.

Does Halifax disclose the Personal Information it holds?

Sometimes Halifax obtains services from other organizations and where necessary (and where the law permits), Personal Information will be provided to those organizations. The kinds of services obtained externally by Halifax include information technology support, financial advice, legal advice and settlement and clearing functions.

External service providers are only authorised to use Personal Information for the purpose for which Halifax supplied it. Those organizations are not authorized to use that Personal Information for their own purposes.

Sometimes, the law requires Halifax to disclose Personal Information. For example, information may be disclosed to a court in response to a subpoena or to a Government agency such as the Australian Taxation Office on receipt of a direction issued under taxation laws.

Where a client nominates someone to act on their behalf, Halifax may provide Information to that person, for example, the client's accountant or financial adviser.

If a client nominates someone to act on their behalf, Halifax must receive a signed written request prior to liaising with the nominated person.

Website

Halifax has implemented procedures and installed equipment to safeguard the security and confidentiality of Personal Information collected via Halifax's website. While it is not necessary to register your personal details to use our website, Halifax does offer a registration service which will enable you to receive additional services and information. In the event you do register with us, Halifax will collect Personal Information from you including your name and e-mail address.

Halifax continually reviews this arrangement to ensure that we are doing all that is reasonably and technically feasible at the time to protect your information. Due to the



nature of the Internet, we cannot guarantee that it is totally protected from hackers or misuse.

Halifax's web site contains links to other web sites whose operator may or may not adhere to a privacy policy or be governed by the Australian Privacy Principles. This Privacy Policy does not apply if you access another website through a link from ours. In this case the privacy policy of the owner of the other website (if any) will apply. We cannot and do not make any warranty or representation as to the practices of any linked websites in the handling of your Personal Information. If you have registered with Halifax and decide, at any time, that you do not wish to receive any further information from Halifax, you can send an Email to the address listed below requesting to be removed from our online registration database. Please allow 2 weeks for your request to be actioned.

You may also amend or update your registration details by sending an Email to the same Email address noted below, providing your amended details. Please allow 2 weeks for your request to be actioned.

Cross border disclosure/Sensitive information/Use of government identifiers/Anonymity & Pseudonymity

Halifax does not, for the purposes of the Privacy Act, collect sensitive information. Wherever lawful and practicable, individuals may deal anonymously with Halifax but given the nature of our services, it is unlikely that this will be a viable option. Halifax does not use official identifiers (e.g. tax file numbers) to identify individuals. An individual's name or Australian Business Number is not an identifier for the purposes of the Privacy Act and hence may be used to identify individuals.

Halifax, may provide your information to parties in the following countries Denmark, United States of America, United Kingdom and Switzerland

Complaints

If you believe that the privacy of your Personal Information has been compromised, you are entitled to complain. Complaints can be made by contacting the person you were dealing with or by contacting the Halifax Privacy Officer. We will respond to complaints as soon as possible. It is Halifax's intention to use our best endeavors 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.



Contact Details

Privacy Officer: Cassandra Moloney

Email: cassie@halifaxonline.com.au

Additional information

If you would like more information about Halifax's approach to privacy, you are encouraged to contact the Privacy Officer on the above mentioned details.