

1. General

HC Securities Pty Ltd (**HC Securities, We, Us, Our**) is bound by the Commonwealth Australian Privacy Principles, the *Privacy Act 1988* (Cth) and the *Privacy Amendment (Private Sector) Act 2000* (Cth) (collectively the "Acts"). The Act and the general law, place strict requirements on HC Securities to treat any information that it hold about you as confidential. This privacy policy details how HC Securities handles and protects that information.

HC Securities has implemented procedures to ensure that Personal Information is handled in accordance with the Act. HC Securities has issued this policy in compliance with the Act.

Please read the following policy to understand how HC Securities deals with the Personal Information that it may collect about you from time to time. This policy may change from time to time, so please revisit the policy periodically.

For the purpose of this policy, "**Personal Information**" means information or an opinion (including information or an opinion forming part of a document or other source), whether true or not, and whether recorded in a material form or not, about a person whose identity is apparent, or can be reasonably ascertained, from the information or opinion.

2. Collection of Personal Information

2.1. Collection of Personal Information from You

HC Securities collects and uses Personal Information for the purpose of carrying out its business and complying with laws and regulations that may require the collection and disclosure of such information.

The Personal Information HC Securities may collect include the following:

- name;
- address;
- e-mail addresses;
- telephone numbers;
- details about your financial position which could include information about your assets and any debts you may have;
- details of any securities you have given HC Securities;
- details of specific transactions;
- any other information required to open an account with HC Securities and its service providers;
- any other information that you have provided as a result of HC Securities dealings with you; and
- any Personal Information necessary for the purposes of the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth).

To assist HC Securities in providing quality services, it is important that the information you entrust to Us is complete, accurate and up-to-date.

In most instances information about you will be collected from you either in an application form, via Our website, during an interview or from telephone contact.

2.2. Collection of Personal Information from Website

We may collect information about you from the HC Securities website, however this information will only be used to identify you where you have provided Us with your details (e.g. if you e-mail your contact details to Us, submit your details via a web form or if you use a logon and password to access a particular service).

When you visit HC Securities website HC Securities' web server may collect the following types of information for statistical purposes:

- Our internet service provider's address;
- the number of users who visit the website;
- the date and time of each visit; and
- the pages accessed and the documents downloaded.

We will not attempt to identify you where HC Securities website may contain links to the websites of third parties. If you access those third party websites they may collect information about you. You will need to contact them to ascertain their privacy standards.

Cookies

A cookie is a small text file placed on your computer hard drive by a web page server. Cookies may be accessed later by HC Securities web server. Cookies store information about your use of the HC Securities website. Cookies also allow HC Securities to provide you with more personalised service when using Our website.

HC Securities uses cookies to:

- determine whether you have previously visited HC Securities website; and
- identify the pages you have viewed.

Most web browsers are configured to accept cookies but you may reconfigure your browser not to accept cookies. If you set your browser to reject cookies you may not be able to make full use of the HC Securities website

2.3. Collection of Information from Third Parties

With your consent, HC Securities may collect Personal Information from a third party or it may collect information from sources you would reasonably expect, for example, information extracted from publicly available sources such as public domain websites or telephone directories.

3. Use and Disclosure of Personal Information

HC Securities will only use or disclose the information collected about you for the purpose for which it was collected, for related purposes which you would reasonably expect Us to use or disclose the information for, or where you have consented to Us using or disclosing the information.

We may use your Personal Information to:

- verify your identity as a requirement of the *Anti-Money Laundering and Counter Terrorism Act 2006* and *Financial Transactions Reports Act 1988* (Cth);
- open and maintain your account;
- process your application and your instructions;
- assist Us to identify which products are of interest to you;
- provide you with product information including product disclosure statements, prospectuses and research;
- audit and monitor the services provided to you; and
- update your personal file.

We may disclose your Personal Information to:

- related companies where the use is related to HC Securities business with you;
- HC Securities' agents, contractors or third party service providers to enable them to provide administrative and other support services to Us; and
- government agencies and regulatory bodies, or for law enforcement purposes, for example where the disclosure is required by the law.

If HC Securities uses your Personal Information for direct marketing of its products or services, We will provide you with the opportunity, at the point of HC Securities first contact and at any time afterwards at your request, to decline

receipt of any further marketing information from Us.

4. Telephone Recording

HC Securities may record telephone conversations for the purposes of training and confirming discussions between you and Our representatives.

Transcripts from such recording may be used as evidence in any dispute or anticipated dispute between HC Securities and you.

5. Data Quality

HC Securities will take reasonable steps to ensure that your Personal Information is accurate, complete and up-to-date.

We will take reasonable steps to destroy or permanently de-identify your Personal Information, if it is no longer needed for any purpose for which the information may be used or disclosed under Section 3 of this policy.

6. Data Security

HC Securities recognises how important the privacy of your personal information is to you and we undertake to store that information in a secure manner. We will protect personal information from unauthorised access, modification and disclosure; misuse and loss; and (subject to record retention regulations) destroy or permanently de-identify personal information we no longer need.

We train and remind our staff of their obligations with regard to your information.

If we send information overseas or use third parties that handle or store data, we ensure that appropriate data handling and security arrangements are in place.

When you communicate or transact with us on the internet via our website we encrypt data sent from your computer to our systems.

We have firewalls, intrusion detection systems and virus scanning tools to protect against unauthorised persons and viruses accessing our systems.

When we send your electronic data outside the company we use dedicated secure networks or encryption.

We limit access to your data by requiring use of passwords and/or smartcards.

We have protection in our buildings against unauthorised access such as alarms and smartcard access.

Where practical, we keep information only for as long as required (for example, to meet legal requirements or our internal needs).

7. Transparency

A paper copy of the policy can be made available on request.

In response to a request by you, HC Securities will take reasonable steps to let you know, generally:

- what sort of Personal Information it holds;
- for what purposes it holds that information; and
- how it collects, holds, uses and discloses that information.

8. Access and Correction

If you wish to verify what information (if any) HC Securities holds on you and / or whether your Personal Information is correct, you may either:

- email info@hcsecurities.com.au (marked "Attention: Privacy Officer") or
- apply in writing to:
Privacy Officer
HC Securities Pty Limited
GPO Box 5392
Sydney NSW 2001

HC Securities will take reasonable steps to confirm the identity of the person making the request and will endeavour to respond within 14 business days of receiving the request.

However, where complying with the request is more complex or time consuming, We will endeavour to provide access to the information requested within 28 business days.

HC Securities reserves the right to deny access to Personal Information if providing access:

- a) could pose a possible threat to life or health; or
- b) could cause an unreasonable impact on the privacy of others; or
- c) would be in response to a frivolous or vexatious request; or
- d) relates to existing or anticipated legal proceedings which could be prejudiced as a result; or
- e) relates to existing or anticipated commercial negotiations involving HC Securities, and HC

- Securities legitimate commercial interests could be prejudiced as a result; or
- f) is in any way unlawful; or
 - g) would be likely to prejudice an investigation of possible unlawful activity; or
 - h) would circumvent a request to HC Securities by an enforcement body performing a lawful security function to not provide access to the information because providing access would jeopardise national security; or
 - i) could likely prejudice:
 - i. the prevention, detection, investigation, prosecution of criminal offences, breaches of the law imposing a penalty or sanction or breaches of prescribed law; or
 - ii. the enforcement of laws relating to the confiscation of the proceeds of crime; or
 - iii. the protection of public revenue; or
 - iv. the prevention, detection, investigation or remedying of seriously improper conduct or prescribed conduct; or
 - v. the preparation for, or conduct of, proceedings before any court or tribunal, or implementation of its orders by or on behalf of an enforcement body.

However, where providing access would reveal evaluative information generated within the company in connection with a commercially sensitive decision-making process, HC Securities may give the individual an explanation for the commercially sensitive decision rather than direct access to the information.

Where there is disagreement about direct access or where direct access to Personal Information is impractical or inappropriate, HC Securities will discuss the possible use of a mutually acceptable intermediary.

If you advise HC Securities that your Personal Information held by Us is inaccurate, incomplete or out of date, We will take reasonable steps to correct or update the information accordingly.

Should there be a disagreement between HC Securities and you about whether the Personal Information is complete or up-to-date then, at your request, We will take reasonable steps to associate a statement from you that the information is not correct with the relevant record(s) held by HC Securities.

HC Securities reserves the right to levy a reasonable charge to meet the costs of providing access to Personal Information, although there will be no charge for lodging a request for access.

HC Securities will provide reason(s) as far as practicable, should it deny access to or correction of Personal Information it holds.

9. Identifiers

HC Securities will not use an identifier assigned to an individual by a government agency or related body as its own identifier; nor will it provide such an identifier to a third party without your consent, unless:

- a) disclosure is necessary for HC Securities to fulfil its obligations to the government agency or related body; or
- b) the use or disclosure is necessary for HC Securities to fulfil its obligations to the government agency; or
- c) one or more of the paragraphs in [Section 3](#) of this policy apply to the use or disclosure of Personal Information; or
- d) the use or disclosure is by a prescribed organisation of a prescribed identifier in prescribed circumstances.

10. Anonymity

Wherever lawful and practical, HC Securities will give you the option of not identifying yourself when dealing with Us.

11. Trans-border Data Flows

HC Securities will not transfer Personal Information outside Australia without your consent unless:

- a) We reasonably believe that the recipient of the information is subject to a law, binding scheme or contract providing substantially similar protection of Personal Information as provided for under Australia's National Privacy Principles; or
- b) the transfer is necessary for the performance of a contract between HC Securities and the individual, or for the implementation of pre-contractual measures taken in response to the individual's request; or
- c) the transfer is necessary for the performance or conclusion of a contract between HC Securities and a third party that is in the interests of the individual concerned; or
- d) the transfer is for the benefit of the individual; it is impractical to obtain the individual's consent and, if it was, the individual would be likely to give it; or
- e) HC Securities has taken reasonable steps to satisfy itself that the recipient of the

information will manage the information consistent with this policy.

12. Sensitive Information

HC Securities will not, without your consent, collect 'sensitive' information, that is information concerning your racial or ethnic origins, political opinions, membership of a political, professional or trade association or trade union, philosophical or religious beliefs or affiliations' sexual preferences or practices or health information unless:

- a) it is required to do so by law; or
- b) it will prevent or lessen a serious and imminent threat to life or health threatening situations and it is not possible or practical to gain your consent; or
- c) the collection is necessary in relation to a legal or equitable claim.

13. Complaints

Wherever lawful and practical, HC Securities will give you the option of not identifying yourself when dealing with company people who may potentially be subject of your complaint or where you may seek to complain about any aspect of HC Securities management of your Personal Information. You may either:

- a) E-mail info@hcsecurities.com.au (marked "Attention: Privacy Officer") or
- b) Apply in writing to:
Privacy Officer
HC Securities Pty Limited
GPO Box 5392
Sydney NSW 2001

You must set out full details of the complaint in order to assist HC Securities to complete a quick and effective investigation, you should include as much detail as you have available to assist the Privacy Officer to identify the nature and scope of the complaint.

The Privacy Officer will maintain a record of all complaints received, including, but not limited to:

- name and contact details of the complainant;
- date the complaint was received;
- nature of the complaint;
- details of the person(s) investigating the complaint;
- outcome of the investigations; and
- dates and details of all contacts made with the complainant.

These records will be held in a secure manner by the Privacy Officer and will only be accessible



to senior management of HC Securities or people in the business in which the complaint relates. Otherwise, the records will only be made available if required or authorised by law or to assist with any investigations carried out by the office of the Federal Privacy Commissioner.

The Privacy Officer or their designate will also be responsible for investigating privacy complaints.

We endeavour to acknowledge all complaints within 7 business days and a full response given within 45 days. Where it is not possible to complete the investigation of a complaint within 45 days, the complainant will be contacted once this period has elapsed with an estimate of when the investigation will be completed.