

Thomas Price Pty Ltd Privacy Policy

The privacy of your personal information is important to us at Thomas Price P/L. (Thomas Price). We are bound by The Australian Privacy Principles, (NPP) set out in The Privacy Amendment (Enhancing Privacy Protection) Act 2012 that governs confidential information that you provide to us. The Office of the Australian Information Commissioner (OAIC) is responsible for private functions that are conferred by the Privacy Act 1988. We are committed to supporting this and any other applicable laws affecting your personal information, including the AML/CTF Act 2006.

This privacy policy outlines Thomas Price's P/L policy on the collection and management of your personal information. It also sets out generally what sort of personal information we hold, for what purposes and how we collect, hold, use and disclose that information.

Opt Out

You can let us know at any time if you no longer wish to receive direct marketing offers from the group. We will process your request as soon as practicable.

Collecting Your Personal Information

Your personal information may be collected via meetings, telephone, email or correspondence.

Why we collect, hold, use and disclose a client's personal information

Thomas Price and its representatives are authorised to collect, hold and use and disclose client's personal information for the purpose of:

- providing you with the financial services you require.
- complying with our regulatory or legal obligations, including:
 - The Anti-Money Laundering & Counter-Terrorism Act, in particular the identification and verification requirements
 - The Corporations Act 2001
 - The Australian Securities and Investments Commission Act 2001
 - The Tax Laws Amendment (Implementation of the FACTA Agreement) Act 2014.
 - The Tax Laws Amendment (Implementation of the Common Reporting Standard) Act 2016 and
 - Applicable taxation laws.

What kind of Personal Information we collect

To enable Thomas Price and its representatives to provide you with financial services that are appropriate for your investment objectives, financial situation and particular needs we need to obtain and hold personal information about you. This includes:

- your name, contact details and date of birth, and those of your partner/s and dependant/s;
- employment details and history;
- financial details including information about your financial needs and objectives, your current financial circumstances including your assets and liabilities, income, expenditure, insurance cover and superannuation;
- details of your investment preferences and risk tolerance;
- information required under the AML/CTF Act 2006
- family circumstances and social security eligibility; and
- other information that we consider necessary.

The personal information collected may include sensitive information such as health information and memberships of professional or trade associations – see below as to why this may be collected to provide the financial services relevant to your needs.

Once appointed we will also collect and hold tax file numbers, financial information relation to the appointment and relevant banking details.

Quality of Data

If it is reasonable and practicable we will only collect your personal information from you. Generally, your personal information will be collected when you meet with your adviser in person, provide your adviser with information over the telephone or via written material, email letter or fax. We may need to collect personal information from third parties such as your accountant. We will ask you to sign an authority to collect this data. The Corporations Act require us to collect sufficient information to ensure appropriate advice can be given in respect of recommendations made to you. If you elect not to provide this information it may affect the appropriateness and adequacy of our advice and expose you to higher risks in respect of the recommendations made.

How Your Personal Information is Held

Your personal information will be stored in a secure environment in hard copy or network client files on a computer database or both. Your personal information may also be held in a secure archiving facility. We will take reasonable steps to ensure that the personal information that we hold is protected from misuse and from unauthorised access, modification, and disclosure. Some of the measures that we have adopted are having a secure storage of personal information, having secure offices and access controls for our computer systems. With exceptions as detailed within this Policy, your information will only be available to employees and appointed representatives of Thomas Price.

We will also take reasonable steps to destroy or permanently de-identify personal information that we no longer need for any purpose for which may be used or disclosed under the Australian Privacy Principles.

Using and Disclosing Your Personal Information

Your personal information may be disclosed for purposes related to the provision to you of the financial services you have requested. The types of third parties that may be provided with your personal information are:

- Any other financial advisers, brokers and organisations involved in providing the financial advice you have requested (which may include ongoing service) such as fund managers who assist us in providing financial advice and paraplanners;
- Insurance providers, superannuation trustees and product issuers in connection with the provision to you of the financial advice you have requested;

- organisations that assist in operating a financial planning business such as those that provide administrative, financial, accounting, insurance, research, legal, computer or other business services;
- your representatives or service providers such as your accountant, solicitor, tax agent, broker, stockbroker, or bank;
- organisations involved in a business restructure or a transfer of all or part of the assets of our business or the due diligence procedures prior to any such sale or transfer; (at your instruction)
- government authorities and other organisations when required by law; and
- other organisations that you have consented to your personal information being disclosed to.

Your personal information may also be used in connection with such purposes. We work to ensure that your personal information is not used or disclosed for any purpose other than:

- the primary purpose for which it was collected, a purpose related to the primary purpose, or a related secondary purpose;
- where you have consented to the use or disclosure; or
- in other circumstances where the Australian Privacy Principles authorise the use or disclosure such as when it is required by, or authorised under, law.

We may also use the information collected from you to provide you with direct marketing such as articles that may be of interest to you. Should you not wish to receive such information please advise us via the "contacting us" section of this policy.

We may disclose your personal information to third parties who provide services to us, in which case we will seek to ensure that the personal information is held, used, or disclosed consistently with the Australian Privacy Principles. We may also acquire information from external parties relating to the services you have authorised us to provide e.g. Accountant if advising on Mortgages, loans etc.

We will otherwise not transfer your personal information outside Australia or use, sell or disclose your personal information without your consent, unless permitted to do so under the Privacy Act or required to by law.

Accessing your Personal Information

You can gain access to your personal information upon contacting our Privacy Officer - see "Contacting us and Privacy Issues" below. The law permits us in some instances to deny the request and if we do so, we will provide you with our reasons.

Correcting Your Personal Information

Contact us if you think there is something wrong with the information we hold about you and we'll correct it if its: inaccurate; out of date; incomplete; irrelevant; or misleading. If you are worried that we have given incorrect information to others, you can ask us to tell them about the correction. We'll help wherever we can – if we can't, we'll let you know in writing. If we agree to correct your information, we'll do so within 30 days from when you asked us, or a longer period that's been agreed by you.

If we can't make corrections within a 30 day time frame or the agreed time frame, we must:

- let you know about the delay, the reasons for it and when we expect to resolve the matter;
- ask you to agree in writing to give us more time; and
- let you know you can complain to our external dispute resolution scheme or the Office of the Australian Information Commissioner.

Identifiers (Tax File numbers)

In some circumstances we are required to collect government identifiers, for example your tax file number. We will not use or disclose this information other than when required to do so by law or when consented to by you.

Sensitive Information

Sensitive personal information is information about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal records, health information, generic information biometric information or biometric templates.

This type of information is not normally collected and would only be collected with your consent where that information is relevant to the financial service that you are seeking. For example, in making an application for insurance, responses to questions involving sensitive personal information may need to be provided. With your consent that information would be collected and provided. If that information is not provided then cover may not be available or on the terms otherwise available.

Notifiable Data Breaches

Thomas Price is required to notify individuals and the OAIC about "eligible data breaches". An eligible data breach occurs when the following criteria are met:

- There is unauthorised access to or disclosure of personal information held by us (or information is lost in circumstances where unauthorised access or disclosure is likely to occur).
- This is likely to result in serious harm to any of the individuals to whom the information relates.
- We have been unable to prevent the likely risk of serious harm with remedial action.

We will conduct an assessment if it is not clear if a suspected data breach meets these criteria. The assessment will determine whether the breach is an "eligible data breach" that triggers notification obligations.

Contacting Us and Privacy Issues

You can obtain further information on request about the way in which we manage the personal information that we hold, or you can raise any privacy issues with us by either contacting The Privacy Officer – Thomas Price on 03 9654 9797 You may be asked to provide your concerns in writing to Level 4, 30 Collins Street, Melbourne Vic 3000.

If you wish to complain about any breach or potential breach of the privacy policy or the Australian Privacy Principles, you should contact the Privacy Officer.

Need more help? If you still feel your issue hasn't been resolved to your satisfaction, then you can raise your concern with the Office of the Australian Information Commissioner: Online: www.oaic.gov.au/privacy

- Phone: 1300 363 992
- Email: enquiries@oaic.gov.au
- Fax: +61 2 9284 9666