



Amalgamated Australian Investment Group Limited ACN 140 208 288

## Privacy Policy

---

Amalgamated Australian Investment Group Limited (referred to as AAIG, 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 the personal information of our clients and customers.

### About this Policy and your privacy

This Policy sets out how AAIG handles your personal information. It explains:

- how and why we collect, use, hold and disclose your personal information, including any sensitive information;
- how you can access the information we hold about you;
- how you can ask us to correct your information or make a complaint about how we have managed your information; and
- the safeguards we have in place to protect the personal information we hold.

### What information do we collect and hold?

#### Personal Information

Personal information includes any information or opinion that can identify somebody, such as name, address, date of birth, telephone numbers or driver's license number.

We collect and hold personal information about you that is both relevant and necessary in order for us to provide you with financial products and services.

This information may include:

- name, date of birth, address, phone numbers, email addresses, gender, occupation;
- government issued identifiers such as driver's licence, Tax File and Medicare numbers;
- financial information, including details of:
  - your investments;
  - bank account details
  - your insurance policies;
  - estate planning strategies;
  - taxation information; and
- other personal information needed or required by law, such as the Anti-Money Laundering and Counter Terrorist Financing Act 2006 (Cth) or tax treaties.

#### Sensitive Information

Sensitive information includes information about a person's racial or ethnic origin, political opinions, political association, religious beliefs or affiliation, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record, health information and genetic information.

We will only collect sensitive information if:

- we need it to provide you with the products or services you have requested or for one of our functions or activities, and have your consent, or
- we are legally required or allowed to collect this information.

Depending on the services you receive from us, this may include:

- health information;
- information about your personal circumstances.

## **How we collect your 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 our products and services, including when you visit our website, call us or send us correspondence.

We may also collect personal information about you from a third party, such as electronic verification services, referrers, marketing agencies, or credit providers.

We will not collect sensitive information about you without your consent, unless an exemption in the APPs 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 you do not provide the personal information we request, we may not be able to provide you with the benefits of all of our services or inform you about other products and services that might be more appropriate or suit your needs. It may also limit or prevent us from releasing records to you or dealing with you.

We do not give you the option of dealing with us anonymously, or under a pseudonym. This is because it is impractical, and, in some circumstances, illegal for AAIG to deal with individuals who are not identified.

## **When we receive unsolicited information?**

We may receive unsolicited personal information about you that we do not require (for example, in correspondence that you may send to us). We will, where reasonable to do so, destroy or de-identify such 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 and it will be subject to this Policy.

## **Information collected when you visit our websites and use online services**

We collect personal information when you visit our websites, when we receive emails and when you use our online services. We may also engage third parties to analyse traffic at that website, which may involve the use of cookies. Information collected through such analysis is anonymous.

Our websites may contain links to other sites, which are not subject to this Policy and our procedures. Refer to these websites directly to obtain their privacy policies and practices.

## Why 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 (including general and/or personal financial advice services);
- 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;
- assist in providing wealth management, financial planning, personal risk and stockbroking services.

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 or required by law.

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 if there is an exemption under the law.

## Who we disclose your personal information to?

We may disclose your personal information to:

- a related entity of AAIG;
- service providers and specialist advisers we engage to provide us with services such as administrative, audit, financial, insurance or research services;
- an agent, contractor, or service provider we engage to carry out our functions and activities, such as our lawyers, accountants, platform providers, storage and emailing services, debt collectors or other advisers;
- insurers;
- third party product issuers and licensed custodians;
- 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;
- financial product issuers and credit providers; and
- anyone else to whom you authorise us to disclose or is required by law.

If we disclose your personal information to service providers that perform business activities for us, we expect them to 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.

## How we manage your personal information?

We recognize the importance of securing the personal information of our customers and clients.

We take reasonable steps to protect your information from misuse, interference, and loss, and from unauthorized access, modification, or disclosure. We will hold your personal information for 7 years after you stop using our services and will then take reasonable steps to securely destroy the information, or to ensure the information is de-identified.

## Disclosing information overseas

AAIG may disclose your personal information to our bookkeeping service provider, which is located in India and to our information technology service provider, which has offices in the Philippines. AAIG may engage service providers located in countries outside Australia to assist in providing products or services and may require disclosure of personal information to overseas providers. When we do disclose or store information overseas, we take reasonable steps to ensure that your information is provided with the same level of protection as it is within Australia.

We will not disclose personal information to recipients outside of Australia unless:

- the overseas third party can provide the same level of protection consistent with our privacy laws; or
- you have consented to the disclosure.

If you consent to your personal information being disclosed to an overseas recipient, and the recipient breaches the APPs, we will not be accountable for that breach under the privacy laws, and you will not be able to seek redress under the privacy laws.

## How we protect and hold your information?

We recognise the importance of securing the personal information of our customers. We will take steps to ensure your personal information is protected from misuse, interference or loss, and unauthorised access, modification, or disclosure.

Your personal information is generally stored in our computer databases. Any paper files are stored in secure areas that have locks and security systems. In relation to information that is held on our computer database, we apply the following guidelines:

- passwords are required to access the system and passwords are routinely checked;
- we have strict access management controls in place to prevent unauthorised people accessing our data or systems;
- training is provided to employees so that they know how to keep your information safe and secure;
- firewalls and other software security measures are in place for our websites and computer systems;
- we have verification processes to identify you when you contact us by phone or online to ensure we only disclose information to you or someone authorised by you.

Please note that data transmission over the internet or data storage system cannot be guaranteed to be 100% secure. If you have reason to believe that the security of any account you have with us has been compromised, please contact us immediately on + 61 2 8356 9356.

## Direct Marketing

We may only use personal information we collect from you for the purposes of direct marketing 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
- 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. You may also request that we provide you with the source of their information. If such a request is made, we will notify you of the source of the information free of charge within a reasonable period of time.

If you would like to “opt out” of having your information used for direct marketing purposes, please contact us via phone on + 61 2 8356 9356 or email at [contact@aaigl.com.au](mailto:contact@aaigl.com.au).

## How to correct your information?

If you believe that the information we hold about you is inaccurate, incomplete or out-of-date, please contact us to get the information corrected.

## How to access your information?

You may request access to the information we hold about you by contacting us. Upon receipt of your request we will endeavour to service your request within 30 days.

We will require identity verification and specification of what information is required. In some circumstances access to your information or parts thereof may not be possible. If this is the case, we will inform you as to why and, where practicable, make alternative arrangements.

## Reporting your privacy concerns

If you have an issue regarding your personal information or to make a complaint about the treatment or handling of your personal information, contact us via:

Email: [contact@aaigl.com.au](mailto:contact@aaigl.com.au)

Phone: + 61 2 8356 9356

Address: The Privacy Officer

Amalgamated Australian Investment Group Limited  
Suite 203, Level 2, 1 York Street, Sydney 2000

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:

Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

Phone: 1300 363 992

Address: Office of the Australian Information Commissioner  
GPO Box 5218 Sydney NSW 2001

Online: [www.oaic.gov.au](http://www.oaic.gov.au)

## Getting a copy of the Policy

We encourage you to review and check regularly for any updates to this Privacy Policy. We will publish the updated version on our website and, by continuing to deal with us, you accept this Privacy Policy as it applies from time to time. If you would like a copy of this Privacy Policy sent to you, please contact us.

## Entities covered by this Policy

AAIG, its subsidiaries and some related entities are subject to the same standards for handling of personal information, regardless of which services they provide. AAIG subsidiaries and related entities this Privacy Policy applies to are:

- APSEC Compliance and Administration Pty Ltd ACN 142 148 409
- APSEC Funds Management Pty Ltd ACN 152 440 723
- Australian Stock Report Pty Limited ACN 106 863 978
- Amalgamated Australian Investment Solutions Pty Limited ACN 123 680 106
- Atlantic Pacific Securities Pty Ltd trading as ASR Wealth Advisers ACN 135 187 085
- Leap Digital Investments Pty Ltd ACN 665 153 935