

# Privacy Policy

## Our Commitment to Privacy

Canaccord recognises that it is important for you to know how we deal with your personal information and for that reason this statement provides details in relation to our current Privacy Policy. This Privacy Statement has been developed to comply with the relevant provisions of the Privacy Act 1988 (Cth) as amended by the Privacy Amendment (Enhancing Privacy Protection) Act, 2012 ("Privacy Laws") setting out a number of Australian Privacy Principles including about how and when personal information can be collected, stored and distributed by Canaccord. This document summarises our Privacy Policy.

## Collection of Personal Information

To provide the highest quality service and advice, Canaccord is required to obtain certain personal information about you. Canaccord is subject to certain legislative and regulatory requirements under s961B of the Corporations Act 2001 (for retail clients) and the Anti-Money Laundering and Counter Terrorism Financing Act 2006 which necessitate us obtaining and holding detailed information which personally identifies you and/or contains information or an opinion about you ("personal information"). Personal information is defined under the Privacy Laws as information or an opinion that can identify a person. In addition, our ability to provide you with comprehensive financial advice is dependent on us obtaining certain personal information about you.

Therefore Canaccord, its representatives and staff may request personal information from you which will generally comprise, but not be limited to the following:

- Personal details e.g. name, address, contact details (phone, fax, email), date of birth;
- Employment details and employment history;
- Details of your financial needs and objectives;
- Financial details including your assets and liabilities (both actual and potential), income and expenditure;
- Details of your current investments, insurance cover and superannuation including amounts, investor numbers and bank account details;
- Details of your personal goals and objectives;
- Details of your investment preferences and aversion or tolerance to risk;
- Health information including current health, smoker status and historical medical records;
- Centrelink details including your benefit type and reference number;
- Taxation information including your tax file number; and
- Estate planning details including status of wills, beneficiaries and powers of attorney.

We do not collect information about anyone's political or religious beliefs, ethnic background or sexual preferences.

In most circumstances, the information that we hold about you has been provided to us by you or under your authority. You have the right to refuse us authorisation to collect information from a third party.

Failure to provide the personal information referred to above may affect the adequacy or appropriateness of advice we give to you and expose you to higher risks in respect of the recommendations made to you.

## Use and Disclosure of Personal Information

Any personal information about you collected by Canaccord will be used for the following purposes:

- To provide recommendations suitable to your personal situation and for preparation of your Statement of Advice;
- To give effect to the recommendations made to you;
- To provide you with agreed services to assist in meeting your goals and objectives;
- Reviewing the recommendations made in relation to various financial products;
- Providing you with information about issues that may affect your personal and financial situation including details of alternative financial products.

The organisations we may be required to disclose information to include, but are not limited to:

- Related entities and internal divisions of Canaccord;
- Any financial institution (including fund managers, share brokers, clearing and settlement providers) with whom you will be investing, are invested in or have previously invested in. This may include companies based outside of Australia;
- Government departments e.g. Australian Taxation Office, RBL Office and Centrelink;
- Your professional Advisors such as solicitor, accountant and medical practitioner;
- Your executor or power of attorney if required;
- External mail house for bulk mail-outs;
- IT contractors working on our systems;
- Any other external party as authorised by you at the time.

The organisations receiving this information are not permitted to use your information for any purpose other than for the specific purpose it was provided.

We will not use or disclose information collected about you otherwise than for a purpose made known to you unless the disclosure is:

- Required by law (e.g. the Australian Tax Office, AUSTRAC and Australian Securities and Investments Commission have the power to order us to disclose information about your situation);
- Authorised by law (e.g. to protect our interests or where we have a duty to the public to disclose); or

- You have consented to our disclosing the information about you. Canaccord does not sell, rent or trade its client's personal information.

Where we have provided personal information about you to a third party provider and you instruct us to notify the third party provider with the updated information, Canaccord will take reasonable steps to provide notification unless it is impractical or unlawful to do so.

## Privacy Policy (continued)

Should Canaccord refuse the request by you we will provide a written notice that explains the reasons for the refusal except to the extent that it would be unreasonable to do so; the mechanisms available to complain about the refusal; and any other matter prescribed by the regulations.

### Overseas Companies

Canaccord is part of the global Canaccord Genuity group of companies with offices in 10 countries worldwide.

In providing our services or as otherwise required by law, we may need to share your personal information with a company based overseas. By providing us with your personal information you consent to Us disclosing your personal information to overseas companies, and acknowledge that We will not be required to use reasonable steps to ensure that the overseas recipient conducts itself in compliance with the Australian Privacy Laws. Companies based overseas are predominantly located in the United Kingdom, Canada, the United States, Singapore and Hong Kong.

Canaccord utilises cloud based computing systems and as such data maintained on our system will be stored in Australia and Singapore.

### Storage and Security

Canaccord recognises how important the privacy of your personal information is to you and has undertaken to store such information in a secure environment. Your personal information may be stored both in hard copy and/or electronically. Canaccord restricts access to your information by maintaining login and password control on all computer systems and has in place secure, lockable filing cabinets to store hard copies of personal information.

Personal information is treated as confidential and sensitive information is treated as highly confidential.

It is a legislative requirement that we keep all personal information and records for a period of 7 years. Should you cease to be a client of ours, we will maintain your personal information on or off site in a secure manner for 7 years. After this, the information will be destroyed in a secure manner.

### Ensure Your Personal Information Is Correct

Canaccord takes all reasonable precaution to ensure that the personal information we collect, use and disclose is accurate, complete and up to date. To ensure we can maintain this level of accuracy and completeness, we recommend that you inform us of any errors in your personal information and update us with any changes to your personal information as soon as possible.

If you provide us with inaccurate or incomplete information we may not be able to provide you with the products or services you are seeking.

We want our records to be accurate, complete and up to date and we rely on the accuracy of the information to provide you with appropriate recommendations. Unless we disagree with you about the accuracy, currency or completeness of a record, we will generally correct it if requested (or suggest alternative arrangements for updating our records). If we disagree with you, we will give you our reasons and record your objections on file.

### Access to Your Personal Information

Under the Australian Privacy Principles you are generally entitled to access the information we hold about you. Where you are entitled to access, the time we require to give you access will depend on the type of information requested. If we can we will answer your question immediately.

We will also try to answer you in the same way that you ask, for example; if you telephone to ask for the information we will, if practicable, give you that information over the telephone. We will generally respond to a written request in writing.

Sometimes we will ask that you put your request in writing to The Privacy Officer, for example; where you want copies of material, access to older information, or files which are not current, or it is necessary for us to retain record of your request.

We may also ask you to identify yourself to our satisfaction.

There are certain conditions under which we may refuse you access to your personal information, such as when your request may unreasonably impact upon another person's right to privacy. If we are entitled under the Australian Privacy Principles to refuse to give you access, we will tell you and provide reasons for our decision.

We will not charge a fee for making a request to access your personal information however we may charge a fee for accessing your personal information. If a fee is applicable, we will disclose this to you prior to providing you with the information.

### Email Communication

As electronic communication becomes more and more part of our daily business lives Canaccord will use your email address that you have provided to contact you when necessary or to provide you with information you have requested.

We will also use your email address to alert you to marketing initiatives, newsletters, or events that may interest you.

If at any time you decide you do not wish to receive such marketing information you have the right to ask us not to send you any further such material. You may do this by advising your adviser or by sending us an email with "Unsubscribe" in the subject line.

Please allow two weeks for this instruction to take effect. We maintain a Register for those individuals not wanting direct marketing material.

### Collection of Information on Our Websites

The Canaccord websites ([www.canaccordgenuity.com](http://www.canaccordgenuity.com) and [www.canaccordwealth.com.au](http://www.canaccordwealth.com.au)) may contain links to other websites whose operator may or may not adhere to a Privacy Policy or be governed by the Privacy Laws. While it is not necessary to register your personal details to use our website, we may offer a registration service in the future which will enable you to obtain information on your current portfolio and update your personal contact details. If in the future you do register with us, it will be our intention to collect personal information from you including your name, e-mail address and other necessary details.

## Privacy Policy (continued)

If you do register with us and decide, at any time that you do not wish to receive any further information from us, you can send an e-mail to the e-mail address noted below requesting to be removed from our online registration database. Please allow 2 weeks for your request to be actioned.

We may use cookies to allow us to identify your browser while you are using our site. Cookies do not identify you, they simply allow us to track usage patterns so that we can measure the level of interest in various areas of our site. All browsers allow you to be notified when you receive a cookie and elect to either accept it or not. Your internet service provider should be able to assist you to set your preferences.

### Complaints

If you wish to complain about any breach or potential breach of this privacy policy or the Australian Privacy Principles, you should contact us and direct your complaint to the Privacy Officer. We will respond to your complaint within 7 days. We will use our best endeavours to resolve any complaint to your satisfaction; however, if you are unhappy with our response, you are entitled to contact the Office of the Privacy Commissioner who may investigate your complaint further.

### Access to Your Information

You may request details of the information we hold about you at any time, by contacting our Privacy Officer:

Privacy Officer – Mr David Barlow  
Canaccord Genuity (Australia) Limited  
Email: david.barlow@canaccord.com.au  
Phone: 03 8688 9100  
Fax: 03 8688 9155  
www.canaccordwealth.com.au  
www.canaccordgenuity.com

In this Financial Services Guide, the term: "Canaccord" is used to refer to Canaccord Genuity (Australia) Limited ABN 19 075 071 355, holder of Australian Financial Services License No.234666.

"Canaccord Financial" is used to refer to Canaccord Financial Group (Australia) Limited ABN 53 128 279 336. "Canaccord Financial Group" is used to refer to Canaccord, Canaccord (Australia) Pty Ltd, Canaccord Financial Group (Australia) Pty Ltd, and their related bodies corporate, which are involved in the provision of financial services outlined in this FSG. Canaccord Genuity Wealth Management is a division of Canaccord Genuity (Australia) Limited. "We", "our" and "us" are used to refer to Canaccord and its representatives. "You" and "your" are used to refer to retail clients, as the term is defined in the Corporations Act 2001 (Cth).