



Privacy Policy

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QuarterFive Pty Ltd (ABN 96 668 837 992) is a Corporate Authorised Representative of Gatekeeper 77 Pty Ltd (ABN 70 675 484 287, AFSL No. 557074).



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References:

- *Privacy Act 1998 (Cth)*



1 Background and purpose of document

1.1 Background

- (a) The Licensee is committed to protecting the privacy of a client’s personal information.
- (b) The Licensee has adopted the Australian Privacy Principles (APPs) contained in the *Privacy Act 1988* (Cth) (**Privacy Act**). The NPPs govern the way in which we collect, use, disclose, store, secure and dispose of our client’s Personal Information. A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner (**OAIC**) at <https://www.oaic.gov.au/>.

1.2 Purpose

- (a) This policy describes how we collect, hold, use and disclose your personal information, and how we maintain the quality and security of your personal information.

2 Types of personal information

2.1 Personal Information

- (a) Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable:
 - (i) Whether the information or opinion is true or not; and
 - (ii) Whether the information or opinion is recorded in a material form or not.
- (b) We collect your Personal Information for the primary purpose of providing our services to our clients, providing information to our clients and marketing. We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure. You may unsubscribe from our mailing/marketing lists at any time by contacting us in writing.
- (c) When we collect Personal Information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

2.2 Sensitive information

- (a) Sensitive information may include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.
- (b) Sensitive information will be used by us only:
 - (i) For the primary purpose for which it was obtained;
 - (ii) For a secondary purpose that is directly related to the primary purpose; and
 - (iii) With your consent; or where required or authorised by law.

2.3 Examples

Examples of personal information we may collect (including but not limited to):

Types of Personal Information	Example
General information	<ul style="list-style-type: none"> • Name • Date of birth • Gender



	<ul style="list-style-type: none"> • Occupation • Signature
Contact information	<ul style="list-style-type: none"> • Residential and/or postal address • Telephone or mobile number • Email address
Government-issued identification documents	<ul style="list-style-type: none"> • Drivers licence details • Passport details • Tax file number
Financial information	<ul style="list-style-type: none"> • Banking details (BSB, account number and account name) • Income, assets and liabilities • Employment details (including the organisation you represent) • Insurance policies
Investment information	<ul style="list-style-type: none"> • Securityholder Reference Number (SRN) • Holder Identification Number (HIN) • Investment statements
Digital information	<ul style="list-style-type: none"> • Internet Protocol (IP) Address • Cookies
Sensitive information	<ul style="list-style-type: none"> • Health information and medical history

3 How personal information is collected

3.1 How personal information is collected

- (a) We may collect your personal information directly from you or in the course of our dealings with you. For example, we may gather personal information from or about you through:
- (i) Interactions between you and our representatives verbally, over the phone, email or other electronic means;
 - (ii) Visits to our website;
 - (iii) Your interactions with our marketing campaigns; or
 - (iv) Forms or surveys you may fill for our marketing activities and events.
- (b) Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances we may be provided with information by third parties.

3.2 Website analytics

- (a) Our website may use general information about your visit, such as your IP address, to help us better understand visitor traffic. Although this data is mostly anonymous, it is possible that under certain circumstances, we may connect it to you.



3.3 Cookies

- (a) A cookie is a small file of letters and numbers that is placed on your electronic device by a website if you allow it. These cookies recognise when your device has visited our website(s) before, so we can distinguish you from other users of the website. This improves your experience and our website(s).
- (b) We do not use cookies to identify you, just to improve your experience on our website(s). If you do not wish to use the cookies, you can amend the settings on your internet browser so it will not automatically download cookies. However, if you remove or block cookies on your computer, please be aware that your browsing experience and our website's functionality may be affected.

3.4 Direct marketing

- (a) We may send you direct marketing communications and information about our services, opportunities, or events that we consider may be of interest to you if you have requested or consented to receive such communications.
- (b) These communications may be sent in various forms, including mail, SMS, fax and email, in accordance with applicable marketing laws, such as the Australian Spam Act 2003 (Cth). You consent to us sending you those direct marketing communications by any of those methods. If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so.
- (c) You may opt-out of receiving marketing communications from us at any time by contacting us.

4 Why personal information is collected and held

4.1 Why personal information is collected and held

We collect and hold your personal information for various purposes:

- (a) For provision of our services and conduct our business operations;
- (b) For activities related to delivery of our services, such as advisory, performance reporting, file research, internal investigations, administrative functions, marketing and promotions, and client satisfaction surveys;
- (c) For disclosure to third parties, such as government departments, other accountants, auditors, law firms, real estate agents, financial planners, insurers, and industry networks, when necessary for them to assist us in providing services to you or to offer related services you have requested;
- (d) For disclosure to third parties as required or permitted by law; and
- (e) If you are a prospective employee, for purposes related to your recruitment, which may involve a third-party recruitment agency.

If you do not agree to the use of your personal information as outlined in this Privacy Policy, or if you choose not to provide the requested information, we may be unable to arrange certain products or services for you, or the products or services we do provide may not fully meet your needs.

4.2 Disclosure of personal information

Your Personal Information may be disclosed in a number of circumstances including the following:

- (a) Where you have consented to its use or disclosure;





- (b) Where you have consented to its use or disclosure to third parties;
- (c) Where we reasonably believe that use or disclosure is necessary to lessen, mitigate or prevent a serious and imminent threat to an individual’s health or safety, or the public's health or safety;
- (d) Where we reasonably suspect that unlawful activity has occurred, is occurring, or may occur, and the use or disclosure is necessary for our investigation or for reporting the matter to relevant authorities;
- (e) Where use or disclosure is required under or authorised by law;
- (f) To develop and improve our business, products and services; and
- (g) For any lawful purpose.

5 Security of personal information

5.1 How personal information is held and stored

- (a) Your personal information is stored on paper, electronically, or both. This may include:

Types of information	Storage of information
<ul style="list-style-type: none"> • General information • Contact information 	<ul style="list-style-type: none"> • Paper records • Electronic software with 2FA – Microsoft SharePoint, IRESS XPLAN, Hubspot
<ul style="list-style-type: none"> • Financial information 	<ul style="list-style-type: none"> • Electronic software with 2FA – Microsoft SharePoint
<ul style="list-style-type: none"> • Investment information 	<ul style="list-style-type: none"> • Electronic software with 2FA – IRESS XPlan
<ul style="list-style-type: none"> • Government-issued identification documents • Sensitive information 	<ul style="list-style-type: none"> • Electronic software with 2FA – Microsoft SharePoint

- (b) We have physical, electronic, and procedural safeguards in place to protect your personal information from misuse, interference, loss, and unauthorized access, modification, or disclosure:
 - (i) Paper records are stored in secure, key-card-access premises.
 - (ii) Electronic data is protected by internal and external firewalls, high-level encryption, and password-protected access that meets Microsoft complexity standards.
 - (iii) Access to personal information is limited to staff and contractors whose roles require it. Our employees and contractors are contractually bound to maintain the confidentiality of the personal information we hold.
 - (iv) Data stored or archived off-site is kept in secure facilities, and we require our storage contractors to implement privacy safeguards.
 - (v) We perform regular data backups, with copies stored at multiple locations for redundancy.
 - (vi) Our staff receive regular training on privacy procedures.





5.2 How personal information is destroyed

- (a) When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your personal information.
 - (i) Paper records are sent for secure destruction. In some instances, paper records and original documents will be returned to you and/or relevant third parties.
 - (ii) Electronic records retained may be archived to alternative storage and are subject to the procedural safeguards described above.
- (b) Personal information is or will be stored for a minimum of 7 years which is required by law.

6 Access to personal information

6.1 Access to personal information

- (a) You have a right to access the personal information we hold about you. If you wish to access your personal information, please contact us in writing.
- (b) In order to protect your personal information, we may require identification from you before releasing the requested information.

6.2 Maintaining the quality of personal information

- (a) You have a right to update and/or correct the personal information we hold about you, subject to certain exceptions. If you wish to update your personal information, please contact us in writing.

7 Data breaches

- (a) We take any accidental or unauthorised loss, use, or disclosure of personal information seriously and will address it promptly.
- (b) As we are subject to the Notifiable Data Breaches Scheme (**NDB Scheme**) under the Privacy Act, we will assess and respond to suspected data breaches in compliance with:
 - (i) Our applicable policies which incorporate the requirements of the NDB Scheme; and
 - (ii) The guidance of the OAIC.

8 Links to third party sites

8.1 Links to third party sites

- (a) Our website(s) may contain links to websites operated by third parties. If you access a third party website through our website(s), personal information may be collected by that third party website.
- (b) We make no representations or warranties in relation to the privacy practices of any third party provider or website and we are not responsible for the privacy policies or the content of any third party provider or website.
- (c) Third party providers / websites are responsible for informing you about their own privacy practices and we encourage you to read their privacy policies.



9 Complaints

9.1 Complaints

- (a) We have procedures in place for dealing with complaints and concerns about our practices in relation to the Privacy Act, the APPs, and any alleged breach of this policy. We will respond to your complaint in accordance with the relevant provisions of the APPs.

Privacy Officer

Level 5, 88 Jolimont Street,

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10 Changes to this policy

- (a) We may update this policy from time to time. By continuing to use our website or otherwise continuing to deal with us, you accept this Privacy Policy as it applies from time to time.

