

PRIMEWEST Privacy Policy Statement

July 2018

PRIMEWEST PTY LTD
54 603 233 290

1. Background

As a global investment manager PRIMEWEST complies with data privacy requirements for a number of jurisdictions in order to protect your information and ensure it's stored properly and correctly. We are committed to protecting and respecting your personal information, and keeping it private. By 'your personal information' we mean any information about you that we may collect from time to time about you as a client, prospective client or other third party or your employees, directors, officers or representatives (any of whom are referred to as "you" or "your" in this statement).

By providing us personal information, you accept that your personal information will be processed by us for the purposes described in this Privacy Policy Statement ("Statement"). You further accept that your personal information may be shared between the entities of the PRIMEWEST and that your personal information will be shared and processed in countries where the level of protection of personal data is not always equivalent to the level of protection that may be provided in your own country.

'PRIMEWEST', 'we', 'us' or 'our' refers to PRIMEWEST PTY LTD Group entities operating in Australia and across the globe.

2. Objective

This Statement relates to the privacy of your information at PRIMEWEST. This Statement aims to outline how we use your personal information and the principles under which we handle your information.

If you are a legal entity or partnership, by engaging in the provision of services with us, you confirm to us that you have provided your employees, directors, officers or representatives with the information set out in this Statement and that they have agreed to us using, in accordance with this Statement, any personal information about them that you provide to us in connection of our financial services business. By continuing to engage in the provision of services with us, you authorise us to use and transfer the personal information about your employees, directors, officers or representatives in accordance with this Statement, as amended from time to time in accordance with the "Notification of Changes" section below.

3. Authority and Scope

This Statement has been approved by the PRIMEWEST CEO and is part of PRIMEWEST's global data Privacy Framework. Our data Privacy Framework applies to all PRIMEWEST staff, including employees, secondees, contractors, directors, non-executive directors, and any other persons acting on behalf of PRIMEWEST or engaged in the PRIMEWEST business in Australia and non Australian jurisdictions in which PRIMEWEST operates. All PRIMEWEST staff are expected to operate within the Privacy Framework.

4. What types of personal information do we collect?

As part of our business relationship with you, we may collect, control, process and use your "personal information" which may include names, postal addresses, e-mail addresses, telephone numbers or any other personal information that you provide to us.

We may also, in appropriate cases and to the extent permitted by law, control, process and use certain "sensitive personal information" (e.g. when undertaking 'Know Your Customer' or anti-money laundering ("AML") checks, we may collect information about any offences that you or your employees, directors, officers or representatives have committed). For the purposes of the EU General Data Protection Regulation, we are respectively the data controller or the data user of your personal information.

5. How do we use your personal information?

Your personal information may be processed, used or transferred for purposes connected to our investment management business, including:

- administering the provision of services between us including, without limitation, billing, internal reporting and analysis and any other ancillary matters;
- complying with requests made by, or making voluntary disclosures to, Regulators, governments, Authorities or Organisations;
- obtaining advice, receiving services or providing a third party with information about matters that may impact on PRIMEWEST;
- providing you with information concerning products and services which we believe will be of interest;
- compliance with any requirement of law, regulation, associations, voluntary codes we decide to adopt, or good practice, anywhere in the world;
- confirming and verifying your identity (this may involve the use of a credit reference agency or other third parties acting as our agents) and to conduct due diligence, including 'Know Your Customer' checks and other procedures that we undertake prior to you becoming our customer. We may also screen against publicly available government and/or law enforcement agency sanctions lists;
- The detection, investigation and prevention of fraud and other crimes or malpractice. For the purpose of, or in connection with, any legal proceedings (including prospective legal proceedings), for obtaining legal advice or for establishing, exercising or defending legal rights; and
- any other purposes that are incidental to, or directly connected with, the above purposes or otherwise in the course of our legitimate financial services business activity.

If you do not wish to provide your personal information for any of the purposes listed immediately above (except for the purpose of providing you with marketing information), we will not be able to provide our financial services to you.

For the purpose of providing you with marketing information relating to our products or services, you are providing your personal information to us on a voluntary basis.

6. Who might we provide your personal information to?

In the course of operating our global investment management business we may provide your personal information to any of the following recipients or categories of recipients:

- our employees, board members, directors, officers or representatives;
- our third-party service providers, business associates, distributors, advisors or auditors (including their employees, directors, officers, sub-contractors or representatives);

- domestic and foreign regulators (“Regulators”), governments, law prevention, detection, investigation or enforcement authorities, tax, social or labour authorities (“Authorities”) and any other authorities or official bodies and their representatives;
- domestic and foreign courts, tribunals, arbitrators, ombudsmen, mediators, other dispute resolution bodies (“DR Organisations”) and their representatives;
- any parties who are directly related to any one of these recipients; and
- any person or entity that you request us or permit us to keep informed.

If you no longer wish us to share your personal information with such person(s) or wish to change your preferences in this respect, please inform by writing to us via [our contact email address](#).

When we provide your personal information to any of the above recipients, that recipient will process your personal information on our behalf. If the recipient processes the personal information for its own purposes, such as a regulator or law prevention agency, it will be responsible for its compliance with any applicable law with regard to your personal information.

7. Will my personal information be transferred to another country?

Yes, your personal information may be transferred to any of the recipients identified in this Statement, and these recipients may be located or have operations in countries other than where you are located. This means that your information might be stored or accessed in countries other than where you are located, including Australia, Barbados, China, countries within the European Union, Hong Kong, India, Japan, Malaysia, Mauritius, New Zealand, Philippines, Singapore, South Korea, Switzerland, United Arab Emirates, United Kingdom and United States. The countries which your personal information is transferred may not offer an equivalent level of protection for personal information to the laws of your home country. In connection with any transfer of personal information to such a country we will implement measures to ensure an adequate level of protection for your personal information.

8. How will we protect your personal information?

Whether your personal information is gathered through face-to-face meetings or by interacting with us via telephone, mail, internet or other methods, we take steps to store your information securely. We hold your personal information in a combination of secure computer systems, storage facilities, paper-based files and other formats. We take a number of steps to protect personal information from misuse, loss, unauthorised access, modification or improper disclosure. This includes instructing staff who handle personal information to respect the confidentiality of personal information and the privacy of individuals.

9. How long will you retain personal information for?

We will only retain your personal information for as long as, in our reasonable opinion, is necessary to comply with applicable law or for the purposes for which we process your personal information (as set out in this Statement).

When we no longer need your personal information we will seek to delete, destroy or de-identify it in accordance with our current records retention policies and any applicable legal and regulatory requirements.

10. How can I update or access my personal information?

It is important for us to maintain accurate records of your personal information. Please inform us of any changes to, or errors in, your personal information as soon as possible by writing to us via [our contact email address](#) and we will update our records accordingly.

You have a right under data protection laws to access the information we hold about you, subject to certain conditions. If you wish to make an application to access your information please write to us via [our contact email address](#). We will do our best to respond within 30 days; if it is going to take longer we will get in touch and ask for more time. There are some situations where we may be allowed to limit your access to information or refuse a request to delete information, for example when the information is commercially sensitive or in respect of deletion, we are required to keep the information to satisfy a regulatory requirement. If that happens, we will write to you and let you know the reasons why.

There is no charge for making a request to access your personal information. However, in some cases there may be a charge to cover the administrative cost of providing this information. If there is a charge, we will give you an estimate and confirm you wish for us to proceed.

Similarly, if you do not want to receive any marketing information from us and wish us to cease using your data for this purpose or if you wish for us to cease using your personal information or would like us to delete the personal information that we hold on you, please inform us by writing to us via [our contact email address](#).

11. Further information

If you have any questions about this Statement or questions or complaints about the processing of your personal data by PRIMEWEST, please contact us via [our contact email address](#)

If you are dissatisfied with PRIMEWEST's handling of any privacy complaints you have the right to lodge a complaint with your data protection supervisory authority. For instance, if you are located in Australia, your data protection supervisory authority is the Office of the Australian Information Commissioner (OAIC).

Privacy and the internet

The following statements are specific and applicable to your use of the **primewest.biz** , websites.

1. Interactive tools

Our websites may provide you with interactive tools to help you make informed choices and provide you with information. We may also make available portals to assist with the provision of services between us. We may collect personal information you enter when using the interactive tools on our website applications.

2. Cookies

Cookies are small pieces of text stored on your computer to help us determine the type of browser and settings you are using, where you have been on the website, when you return to the website, where you came from, and to ensure your information is secure. We use cookies on our websites to record and remember when you have seen a policy, such as our cookie notification "pop-up" on the websites, or provided consent, such as consent to the terms and conditions on our online forms.

The purpose of using cookies is to enhance the way our website works, and to provide you with a more relevant and effective experience on our websites, including presenting web pages according to your needs or preferences, for example, by determining whether site visitors can find information easily, or by identifying the aspects of our websites that are of the most interest to them. Additionally, cookies help to improve and tailor the user's experience of the site by allowing us to recognise, measure and track visitors to our websites and compile a record of this usage information.

We use cookies to give you access to certain pages of the websites without having to log in each time you visit. We may also use external service providers to track the traffic and usage on the website. Cookies are frequently used on many websites on the internet and you can choose if and how a cookie will be accepted.

Managing your cookie preferences

If you wish to remove cookies set by our websites from your browser in the future, you may delete them and change your preferences and options in your browser. The instructions for removing cookies from your computer or mobile device and stopping cooking storage depends on the operating system and web browser you use. You may not be able to access some parts of our websites, or some functionality of the site may be impaired, if you choose to disable the cookies in your browser, particularly the secure parts of the website.

3. Links to third party websites

Our websites have links to external third party websites that may benefit the user. External websites should contain their own privacy statements and we recommend you review them when using their websites. Please note, however, that third party websites are not covered by this policy, and these sites are not subject to PRIMEWEST's privacy standards and procedures.

4. Website analytics

Website analytics measurement software is used to assist in tracking traffic patterns to and from our websites, surveying users of the sites. Website analytics are used to collect such information as the number of unique visitors, how long these visitors spend on the website when they do visit, and entry and exit points into and from the website.

This information is collected and aggregated by third party software and provided to us to assist in our analysis of our websites and to manage and improve the services we provide to you. These website analytics are generally anonymous, however if you have allowed tracking then we may be able to identify you in some circumstances, for example when you submit a form or visit the website from a link in one of our newsletters. Where this information is identifiable then we may be storing personal information about you via the use of our website analytics.

Managing your tracking preferences

You can choose if and how we can track or obtain website analytics about you by changing your preferences and options in your browser. The instructions for turning off tracking from your computer or mobile device depend on the operating system and web browser you use.

Notification of changes

This Statement is dated July 2018. From time to time we may amend this Statement without notice and an amended Statement will be posted and available on our website. This may be for a number of reasons, including changes in law, market practice or our treatment of your personal information.