

## HAMILTON WEALTH PARTNERS PTY LTD PRIVACY POLICY

### 1. WHAT PERSONAL INFORMATION DOES HAMILTON WEALTH PARTNERS COLLECT?

Personal information is information or an opinion about you from which you can be reasonably identified. The personal information Hamilton Wealth Partners may collect about you will depend on the circumstances of collection, including whether we collect the information from you as a client, supplier, contractor, stakeholder, job applicant or in some other capacity.

Hamilton Wealth Partners collects personal information so that we can provide you with our products and services and comply with our legal obligations such as those under superannuation laws, taxation laws and the Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) Act. If Hamilton Wealth Partners does not collect your personal information, we may not be able to provide you with a product or service.

The product or service that we are providing will also determine what information we will collect about you. The kinds of personal information that Hamilton Wealth Partners may collect and hold about you include: your name, contact details, date of birth, citizenship, tax file number (TFN), employment details, financial information and banking details. In some cases we may collect information about your family (eg details related to your spouse, dependents or beneficiaries where we are providing you with services which they have a stake in).

In addition, we may collect personal information about individuals who are not clients of Hamilton Wealth Partners (eg business contact details of a company representative with whom we deal).

In the context of Hamilton Wealth Partners' recruitment process for employees and contractors, we may collect and hold the following kinds of personal information about you: your name, contact details, date of birth, citizenship, employment references, civil, credit and criminal records, regulatory accreditations, media (including social media), directorships, property ownership, passport and driver's licence information, education, employment history and credential variation.

In the employment context, we may also collect and hold the personal information listed above, as well as your TFN, financial information, banking details, and other personal information that may be collected in your use of Hamilton Wealth Partners systems or assets. This information may be collected to assist us in monitoring compliance with our internal policies and perform other necessary functions and activities.

Generally, we will not collect sensitive information about you (such as your race, political beliefs or religion). We may collect information about your health if necessary to provide you with a product or service (eg estate planning). If we need sensitive information, we will ask for your consent when we collect this information (unless an exemption applies).

## **2. HOW DOES HAMILTON WEALTH PARTNERS COLLECT AND STORE PERSONAL INFORMATION?**

### **Collecting information**

Depending on how you choose to interact with us, we may collect your personal information when you contact us or our service providers by telephone, by email, through our web site, complete an application or registration form, or when you meet one of our representatives face to face.

Hamilton Wealth Partners may also collect information about you from third parties. For example, Hamilton Wealth Partners may collect personal information from:

- your representatives
- our service providers
- your employer
- our corporate clients, where we are providing services to them
- referees, in the case of prospective employees
- ASIC for AML/CTF.

### **Collecting information from visits to Hamilton Wealth Partners's website**

Hamilton Wealth Partners may collect information based on how you use Hamilton Wealth Partners's website. Hamilton Wealth Partners uses "cookies" and other data collection methods such as pixel tags to collect information on website activity such as the number of visitors and the number of pages viewed. This information is collected to analyse and improve our website, our marketing campaigns and to record statistics on web traffic. No attempt is made by Hamilton Wealth Partners to use this information to personally identify you.

If you access your account information online through one of the secure areas of Hamilton Wealth Partners's website, we will collect information about your visit using cookies to track your use of our website and to allow you to effectively access your account information. This information is collected for security purposes and to protect the integrity of your account details.

### **Securing your personal information**

We hold personal information in secure computer storage facilities with our service provider, on paper-based files; as well as in other formats. Hamilton Wealth Partners takes reasonable steps to protect your information from loss and unauthorised access, destruction, use, modification or disclosure. Access to personal information held by Hamilton Wealth Partners is controlled to prevent misuse or unauthorised disclosure of the information. We utilise a range of technical security measures such as secure authentication, password controls, encryption, firewalls and anti-virus technology to prevent unauthorised access to your information.

## **3. HOW DOES HAMILTON WEALTH PARTNERS USE YOUR PERSONAL INFORMATION?**

Hamilton Wealth Partners may collect, hold, use or disclose your personal information to provide you, and our corporate clients, with a range of products and services, such as:



- establishing and managing your investment in superannuation or investment funds
- providing you with tailored financial advice
- planning for your wills, trusts, and estates
- providing an investment platform.

We may also collect, hold, use or disclose your personal information to:

- consider any concern or complaint that you raise against Hamilton Wealth Partners and/or to manage any legal action between you and Hamilton Wealth Partners
- prevent or investigate any actual or suspected fraud, unlawful activity or misconduct
- identify you or establish your tax status under any Australian or foreign legislation
- comply with any relevant laws, regulations, codes of practice and court orders
- consider job applicants for employment.

Personal information collected about you may be used by different service providers within the Hamilton Wealth Partners universe, but only if this is necessary in order for us to provide you with products or services.

Hamilton Wealth Partners may use your personal information that we have collected about you to identify a product or service that may be of interest to you. If at any time you no longer wish to be notified about other Hamilton Wealth Partners services or promotions please contact us. Privacy specific contact details are included at the end of this policy.

We may also use your information for other purposes required or authorised by or under the law (including purposes for which you have provided your consent).

#### **4. HOW IS PERSONAL INFORMATION DISCLOSED TO OTHERS?**

Hamilton Wealth Partners does not sell, rent or trade personal information to, or with, third parties.

In some circumstances, your information may be disclosed to Hamilton Wealth Partners's service providers that perform a range of services on our behalf. Examples include:

- fund and investment administrators/managers
- auditors and solicitors
- custodians and brokers
- registry and platform providers
- information Technology/vendors
- other consultants.

Where we disclose your information to our service providers, we will take steps to ensure that they are authorised to only use personal information in order to perform the functions required by Hamilton Wealth Partners.

Depending on the nature of the product or service that we are providing, we may disclose your personal information to your nominated representatives (eg your accountant) and their respective service providers.

In relation to superannuation products, we may disclose your personal information to the trustee of another superannuation fund where your superannuation is transferred to or from the other fund.

We may also disclose your personal information to law enforcement agencies, courts or government agencies where required to comply with specific legal requirements.

With your consent, we may also disclose your personal information to other third parties and for other purposes. That consent may be written, verbal or implied from your conduct.

#### **5. HOW YOU MAY ACCESS OR CORRECT YOUR PERSONAL INFORMATION?**

You may contact us to request access to the personal information we hold about you at any time. You may also ask us to correct information about you that you may believe is inaccurate, incomplete or out of date.

We will need to verify your identity before giving you access, or correcting your information.

In certain circumstances, Hamilton Wealth Partners may not be able to correct or provide you with access to your information. In these circumstances, we will write to you to explain and provide the reasons why.

#### **6. HOW YOU MAY COMPLAIN IF YOU HAVE CONCERNS ABOUT HOW HAMILTON WEALTH PARTNERS HAS MANAGED YOUR PERSONAL INFORMATION?**

If you have a complaint related to how Hamilton Wealth Partners has managed your personal information, you should contact the Hamilton Wealth Partners Privacy Officer.

Privacy Officer, Hamilton Wealth Partners Limited

PO Box 7031

GLEN IRIS VIC 3146

Telephone: 03 9275 8888

If we cannot resolve your complaint then you may wish to raise your issue with the Office of the Australian Information Commissioner (OAIC). The Commissioner may be contacted on the privacy hotline: 1300 363 992.

#### **7. NOTIFIABLE DATA BREACHES**

We are 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 unclear if a suspected data breach meets these criteria. The assessment will determine whether the breach is an 'eligible data breach' that triggers a notification obligation.**8 ADDITIONAL INFORMATION**

Further information on privacy in Australia may be obtained by visiting the OAIC at <http://www.oaic.gov.au/>.