

Privacy Policy

February 2020

INTRODUCTION

TRG Financial Pty Ltd is bound by the Privacy Act 1988 ('Privacy Act'), including the Australian Privacy Principles ('APPs'). TRG Financial recognises the importance of ensuring the confidentiality and security of your personal information.

Copies of this Policy are available free of charge by contacting our Privacy Officer.

In this Policy:

- 'TRG Financial', 'we', 'our', and 'us' means TRG Financial Pty Ltd ACN 603 646 117, the holder of Australian Financial Services (AFS) Licence No. 508008.
- 'Financial Product' means any financial product in relation to which our AFS Licence authorises us to provide financial services including shares, debentures, bonds, bank bills, convertible notes, units in managed investment schemes, any other equity or debt product, and their derivatives and deposit products, in each case whether market traded or not (i.e. listed or unlisted).
- 'You' and 'your' refers to the individual whose information we collect and hold for the purposes of providing our services. Depending on the context, it may also refer to the organisation you represent.
- 'Disclosing' information means providing information to persons outside TRG Financial.
- 'Personal information' means information or an opinion relating to an individual, which can be used to identify that individual.
- 'Privacy Officer' means the contact person within TRG Financial for questions or complaints regarding TRG Financials handling of personal information.
- 'ASIC' means the Australian Securities and Investments Commission.
- 'ASX' means ASX Limited or a financial market it operates, as the context requires.
- 'AUSTRAC' means Australian Transaction Reports & Analysis Centre.

WHAT KINDS OF PERSONAL INFORMATION DO WE COLLECT AND HOLD?

We may collect and hold a range of information about you to provide you, your business or employer with our services, including:

- your full name and contact details;
- your occupation, employer, employment history, and professional memberships;
- your date of birth;
- your Tax File Number, but only if you provide it to us;
- the names and addresses of your dependants or beneficiaries;
- your family and business relationships;
- your financial circumstances (i.e. your objectives, financial situation and needs), including your salary, other sources of income, levels of cash flow debt and expenses, your investments, investable funds, trading experience and your attitude to investment risk;
- Holder Identification Numbers (HINs) or Security holder Reference Numbers (SRNs) identifying your financial product holdings;
- your creditworthiness and capacity to carry or access or guarantee debt;
- other matters which you tell us about or that is included in information you give us; and
- any other information relevant to the services we provide.

There may be occasions when we receive or need to source personal information about you from third parties such as:

- banks (for example, opinions about your creditworthiness);
- publicly available sources of information (for example, telephone directories and financial product registries);
- our business alliance partners;
- your representative or agent;
- your financial adviser, accountant, margin lender, investment banker or mortgage broker; or
- Government agencies.

HOW DO WE COLLECT PERSONAL INFORMATION?

Personal information about you will usually be collected from you or your duly authorised representative(s), during face to face interviews and meetings, during telephone discussions or other communications with you (for example, by email), during negotiation of service arrangements or requirements with us or by means of our client account application or mandate negotiation process (which may be submitted electronically). We may also collect personal information from your agent or other person providing services to you where they have introduced you to us or have arranged for TRG Financial to provide certain services to you.

We may also collect personal information about you from a third party, such as government regulators or accountants. If so, we will take reasonable steps to ensure that you are made aware of this Policy. We may also use third parties to analyse traffic at our website, which may involve the use of cookies. Information collected through such analysis is anonymous.

TRG Financial 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 is necessary to take appropriate action in relation to suspected unlawful activity or serious misconduct.

If you do not provide us with the personal information we request, we may not be able to provide you with our products or services, or meet your needs appropriately.

TRG Financial does not give you the option of dealing with us anonymously, or using a pseudonym. This is because it is illegal or impractical for TRG Financial to deal with individuals who are not identified.

UNSOLICITED PERSONAL INFORMATION

TRG Financial may receive unsolicited personal information about you. We destroy or de-identify all unsolicited personal information we receive, unless it is relevant to our purpose of 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.

USE OF YOUR PERSONAL INFORMATION?

Your personal information will primarily be used to provide you with financial services or access to a financial product(s). We may use the information to:

- check whether you are eligible for the product or service;
- provide you with advice about the product or service;
- review and provide advice about your investment holdings or portfolio;
- arrange an application or redemption of an unlisted product, or to buy or sell a market- traded product for you, using the service infrastructure of the relevant specialists (for example, persons who provide clearing and settlement services or other brokers who can trade in markets where we are not authorised to trade directly);
- provide you with advice about business planning and financial structuring, and issuing financial products;
- assist us to manage or administer a product or service for you; and /or
- identify you in relation to all your dealings with us. In support of the services you require or are likely to require, we may also use personal information for related purposes you would reasonably expect, including:
- facilitating authorised direct credit /debit payment arrangements with your bank or other financial institution or product provider;
- telling you about products or services we believe may interest you (for example, mail - outs of newsletters or direct marketing material), but you can contact us at any time to request that we not do this;
- instructing couriers, delivery companies and mail houses to make deliveries of documents and other material to you;
- running and improving our business (for example, training our staff, preventing fraud, record keeping, accounting, enhancing our services, statistical analysis of our client activities and services); and /or
- inviting you to attend, or following up your attendance at a seminar or forum we have arranged, sponsored or presented at.

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 by the Privacy Act.

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 an exemption in the Privacy Act applies.

WHO DO WE DISCLOSE PERSONAL INFORMATION TO?

Your personal information may be capable of being accessed by all representatives of TRG Financial, in order for us to provide you with the products and services we offer efficiently and effectively.

We may provide personal information about you to other organisations outside TRG Financial, including:

- third parties who assist in providing, managing or administering a product or service. This may include for the purpose of opening and maintaining an account with third party service providers we use to enable execution and /or timely clearing and settlement of market transactions entered into on your behalf, and for the purpose of completing applications to issuers for Initial Public Offerings (IPOs) or other new issues of Financial Products (New Issues); and
- with respect to ASX, information may also be provided to the Clearing House Electronic Sub-Register System (CHES) and other entities within the ASX group of companies (such as those involved in clearing, settlement and market surveillance), share registries, financial institutions, other service providers (such as software providers) of any such entities, and, where applicable, margin lenders;
- if ever relevant, your executor, administrator, trustee, guardian or attorney;
- businesses we use for printing and dispatch of reports, newsletters and other services we despatch to you;
- your bank or other financial institution(s) to arrange or make direct credits / debits or other payments;
- your agents, including your legal or tax advisers, or those who have referred you to us;
- event organisers to ensure you are invited to seminars and forums we believe would be of interest to you;
- stockbrokers and custodians for the purposes of completing transactions in foreign financial products;
- complaints and dispute resolution schemes or arbitration schemes which have jurisdiction over us;
- our auditors, external advisers, consultants and other contractors to whom certain functions and activities are contracted and /or outsourced (including portfolio administration and reporting services) Where relevant, confidentiality arrangements will apply to prohibit these organisations from using or accessing your personal information except for the specific purpose for which it needs to be accessed or supplied to them. We will only disclose personal information to other third parties with your consent or if we are permitted or authorised to do so by law.

We will be obliged to provide personal information about you when:

- required by law or other regulations (for example, to ASIC, AUSTRAC, the courts or the Australian Taxation Office, all of whom have the power to order us to disclose information about you and your dealings with us); or
- otherwise authorised by law (for example, in order to protect our interests or where we have a duty to the public to disclose).

DO WE DISCLOSE YOUR TFN?

We only use your TFN for the purpose required by law, as permitted by the Privacy Act and TFN Guidelines and as instructed by you.

SENDING INFORMATION OVERSEAS

We are not likely to disclose your personal information to any overseas recipient.

We will not disclose your personal information to overseas recipients without your consent unless:

- we have taken reasonable steps to ensure that the recipient does not breach the Privacy Act, or the APPs; or
- the recipient is subject to a similar information privacy regime.

MANAGEMENT OF PERSONAL INFORMATION

TRG Financial recognises the importance of securing the personal information of our clients. 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 database. Any paper files are stored in secure areas. In relation to information that is held on our computer database, we apply the following guidelines:

- passwords are required to access the system;
- unauthorised employees are barred from updating and editing personal information;
- all computers which contain personal information are secured electronically;
- we have procedures for the disposal of personal information; and
- hard-copy personal information is shredded.

DIRECT MARKETING

TRG Financial may only use personal information we collect from you for the purposes of direct marketing without your consent 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
- we provide a simple way of opting out 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.

We do not disclose names and addresses to third parties for the purposes of allowing them to market their products and services to you.

IDENTIFIERS

We do not adopt identifiers assigned by the Government (such as driver's licence numbers or Tax File Numbers) for our own file recording purposes.

HOW DO WE KEEP PERSONAL INFORMATION ACCURATE AND UP-TO-DATE?

We are committed to ensuring that the personal information we collect, hold, use and disclose is relevant, accurate, complete and up-to-date.

We encourage you to contact us if any personal information we hold about you needs to be updated. For users that register their details on our website, we store the personal information provided in their user profile. All users can see, edit or delete their personal information at any time (except for their username). The website's administrators also have access to view and edit such information. If we correct any personal information that has previously been disclosed to another APP entity, we will take reasonable steps to notify the other APP entity of the correction, unless it is impracticable or unlawful to do so. Where we are satisfied information is inaccurate, we will take reasonable steps to correct the information within 30 days, unless you agree otherwise. We will not charge you for correcting your personal information.

ACCESSING YOUR PERSONAL INFORMATION

Subject to exceptions in the Privacy Act, you can access the personal information that we hold about you by contacting our Privacy Officer. We will generally provide access within 30 days of your request. If we refuse to provide you with access to the information, we will provide reasons for the refusal.

We will require identity verification and specification of what information is required. An administrative fee for search and photocopying costs may be charged.

For users who have registered via our website, you can access your user profile and edit or delete any personal information contained there.

EMBEDDED CONTENT FROM OTHER WEBSITES

Articles on our website may include embedded content (e.g. videos, images, articles, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website.

These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged into that website.

UPDATES TO THIS POLICY

This Policy will be reviewed from time to time to take account of new laws and technology, and changes to our operations and the business environment.

MAKING A COMPLAINT

If you have any questions about this Policy, or wish to make a complaint about how we have handled your personal information, you can lodge a complaint with us by:

- telephoning – 03 5304 8200
- writing – TRG Financial Privacy Officer, PO Box 80W, BALLARAT WEST, VIC 3350
- emailing – info@trg.com.au

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 by:

- telephoning – 1300 363 992
- writing – Director of Complaints, Office of the Australian Information Commissioner, GPO Box 5218, SYDNEY NSW 2001
- emailing – enquiries@oaic.gov.au