

Privacy Policy Statement Version 8.1 (01/05/2008)

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Our Commitment

Infocus Securities Australia Pty Ltd (Infocus) recognises that your privacy is very important to you, which makes it important to us.

We are bound by, and committed to supporting, the National Privacy Principles (NPPs) set out in the Privacy Amendment (Private Sector) Act 2000. We believe that this Statement will address any potential concerns you may have about how personal information you provide Infocus is collected, held, used, corrected, disclosed and transferred. You can obtain more information on request by contacting us in one of the ways set out below.

Collection

As a financial planning organisation we are subject to certain legislative and regulatory requirements, which necessitate us obtaining and holding detailed information about you. This information personally identifies you and/or contains information or an opinion about you (“personal information”). In addition, our ability to provide you with a comprehensive financial planning and advice service is dependent on us obtaining certain personal information about you, including:

- (a) employment details and employment history;
- (b) details of your financial needs and objectives;
- (c) details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, insurance cover and superannuation;
- (d) details of your investment preferences and aversion or tolerance to risk;
- (e) information about your employment history, employment circumstances, family commitments and social security eligibility;
- (f) medical history for risk insurance applications.

We are required, pursuant to the Corporations Act and Rules of Professional Conduct of the Financial Planning Association of Australia, to collect sufficient information to ensure appropriate advice can be given in respect of recommendations made to our clients. If you elect not to provide us with the personal information referred to above, we may not be able to provide you with financial planning advice.

We will not collect any personal information about you except when you have knowingly provided that information to us or authorised a third party to provide that information to us. Generally collection of your personal information will be effected in either face to face interviews, over the telephone or by way of a financial fact find. From time to time additional and/or updated personal information may be collected through one or more of those methods.

We will only collect, maintain and use Personal Information about you if it is necessary for us to adequately provide to you the services you have requested, including:

- (a) the preparation of your financial plan;
- (b) the provision of financial planning advice to you;
- (c) making securities and investment recommendations;
- (d) reviewing your financial plan;
- (e) reviewing securities and investment recommendations;
- (f) the provision of risk insurance advice and cover;
- (g) the provision of equity or lending services.

Use and Disclosure

We will not use or disclose Personal Information collected by us for any purpose other than:

- (a) the purposes for which it was provided or secondary related purposes in circumstances where you would reasonably expect such use or disclosure; or
- (b) where you have consented to such disclosure; or

- (c) where the National Privacy Principles authorise use or disclosure where required or authorised under law, in circumstances relating to public health and safety and in connection with certain operations by or on behalf of an enforcement body.

We are required under the Rules of Professional Conduct of the Financial Planning Association of Australia to make certain information available for inspection by the Association on request to ensure ongoing compliance with mandatory professional standards. This may involve the disclosure of your personal information. We are also obliged pursuant to the Corporations Act to maintain certain transaction records and make those records available for inspection by the Australian Securities and Investments Commission.

We may use the personal information collected from you for the purpose of providing you with direct marketing material such as articles that may be of interest to you, however if you do not wish to receive such information you may request not to receive it, by contacting us by any of the methods detailed below. Please allow 2 weeks for your request to be actioned.

We may also disclose your Personal Information to superannuation fund trustees, insurance providers, and product issuers for the purpose of giving effect to your financial plan and the recommendations made by us.

In order to ensure that you receive a personal and tailored service, your Personal Information will be made available to other Infocus authorised representatives and staff for the purposes of assisting you as necessary. It is a condition of our agreement with each of our authorised representatives that they adopt and adhere to this privacy policy. You can be assured that all authorised representatives and staff will maintain your information in accordance with this policy. If you have any concerns in this regard, you should contact us by any of the methods detailed below.

We may disclose your personal information to external parties for the following purposes:

- (a) Database improvements and maintenance,
- (b) Assistance with mail-outs,
- (c) Professional advisers engaged in a capacity to assist Infocus.

It is a condition of our agreement with each of the external parties that they adopt and adhere to this privacy policy. You can be assured that your information will be maintained in accordance with this policy by any contractor to whom it is disclosed. If you have any concerns in this regard, you should contact us by any of the methods detailed overleaf.

In the event that we propose to sell our business we may disclose your personal information to potential purchasers for the purpose of them conducting due diligence investigations. Any such disclosure will be made in confidence and it will be a condition of that disclosure that no personal information will be used or disclosed by them. In the event that a sale of our business is effected, we may transfer your personal information to the purchaser of the business. As a client you will be advised of any such transfer.

We will only use your personal information for the main purpose we told you it was needed for, except where you consent to us using that personal information for another purpose, where the other purpose is related to the main purpose and you would reasonably expect us to use the personal information for that other purpose, or where it is permitted or required by law, or we reasonably believe it is necessary on health or public safety grounds to use the personal information for another purpose.

Access and Correction

If you ask, we will tell you what personal information we hold about you, and what we do with it. On receipt of your request we will facilitate access to you by allowing an inspection of your personal information in person, or by providing copies or an accurate summary of relevant documents, depending on what is most appropriate in the circumstance. Prior to providing this access we will require you to provide evidence of your identity. Any charge we make for providing access will be reasonable.

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We will not provide you access to personal information which would reveal any confidential formulae or the detail of any in house evaluative decision making process, but may instead provide you with the result of the formulae or process or an explanation of that result.

We will not provide you with access to your personal information if:

- providing access would pose a serious threat to the life or health of a person;
- providing access would have an unreasonable impact on the privacy of others;
- the request for access is frivolous or vexatious;
- the information related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings;
- providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations;
- providing access would be unlawful;
- denying access is required or authorised by or under law;
- providing access would be likely to prejudice certain operations by or on behalf of an enforcement body or an enforcement body requests that access not be provided on the grounds of national security.

In the event we refuse you access to your personal information, we will provide you with an explanation for that refusal.

At all times we will endeavour to ensure that the personal information we hold about you is up to date and accurate. If you can show us that the Personal Information we hold is inaccurate, we will take all reasonable steps to correct the information. If we do not agree that your personal information requires correcting, we will take reasonable steps to ensure that whenever your personal information is accessed, that it is apparent you are not satisfied as to the accuracy or completeness of that information.

We will endeavour to respond to any request for access within 14-30 days depending on the complexity of the information and/or the request. If your request is urgent please indicate this clearly.

Security

Your personal information is generally held in your client file and on our computer database.

We will at all times seek to ensure that your personal information is protected from misuse, loss, unauthorised access, modification or disclosure. At all times your personal information is treated as confidential and any sensitive information is treated as highly confidential. All paper files are stored in lockable cabinets/rooms. Access to our premises is controlled by only allowing authorised personnel to access those locations where personal information is stored. All computer-based information is protected through the use of access passwords on each computer and screen saver passwords. Data is backed up each evening and stored securely off site.

In the event you cease to be a client of this organisation, any personal information which we hold about you will be maintained in our secure storage facility for a period of 7 years in order to comply with legislative and professional requirements, following which time the information may be destroyed.

Cookies

When you visit our website, details may be recorded about your visit, such as time and date, your server address, pages accessed, time spent and type of browser. This information is used in an anonymous form for statistical purposes and as such cannot identify you individually.

When you log into the client section of our site, we may use cookies to identify who you are, while you are logged in for the session. The cookie is unique to that session, and the data within the cookie is encrypted.

You must have cookies enabled to be able to use our site.

Identifiers

We will not adopt as our own any identifiers that you may provide to us such as TFNs, Medicare numbers etc.

Sending Data Overseas and Third Party Websites

We will not send any personal information about you overseas unless you consent to this, or we reasonably believe that the other country has privacy laws substantially similar to our own, or we provide the information in other circumstances giving like protection.

Our website may contain links to other websites. When visiting these websites be sure to check the privacy policy as we are not responsible for privacy practices of those other parties.

Complaints Resolution

If you wish to complain about any breach or potential breach of this privacy policy or the National Privacy Principles, you should contact our Privacy Officer by any of the methods detailed below. Your complaint will be considered and responded to within 14 days. We will seek to address any concerns that you have through our complaints handling processes, however, if you are unhappy with our response, you are entitled to contact the Office of the Federal Privacy Commissioner who may investigate your complaint further.

Contact Us

If you seek any further information from Infocus about this Statement or our privacy policy generally please contact our Privacy Officer at one of the reference points below:

Email: support@infocus.com.au
Address: Level 1, Kawana House
1 Innovation Parkway
BIRTINYA QLD 4575
Postal: PO Box 1856
SUNSHINE PLAZA QLD 4558
Telephone: (07) 5436 9400
Facsimile: (07) 5437 8931

