

Privacy Policy

June 2024



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Revision Header

Revision No.	Revision Date	Revision Comments	Prepared By:	Approved By:
1	August 2018	Initial Version	Compliance Officer	Board
2	August 2023	Periodic Review – Minor amendments: - Inclusion of AFCA as regulator - Minor formatting	Compliance Officer	N/a – minor amendments only.
3	June 2024	Periodic Review – No amendments required	Compliance Officer	N/a – minor amendments only.

This Policy will be reviewed every two years.
This Policy can only be amended with the approval of the Board, with the exception of minor amendments that do not affect the nature, substance or intent of the document.

1. Purpose and scope

This is the Privacy Policy for Aliro Group Pty Limited and applies to all companies in the Aliro Group (**we, us or our**). It applies to us in our capacity as trustee and investment manager of the various trusts and other investments to which we operate as a funds management business.

Our clients' privacy is important to us and we are committed to managing their personal information responsibly and in accordance with our legal obligations including the requirements of the Privacy Act 1988 and with the Australian Privacy Principles. These laws and principles regulate, among other things, the way we collect, use, disclose, keep secure, and give you access to our client's personal information.

This Privacy policy explains how we manage and protect personal information, including:

- What personal information does Aliro collect?
- How does Aliro go about collecting and storing personal information?
- For what do we use personal information and how is it disclosed to others?
- How you may access or correct your personal information?
- How you can complain if you have concerns about how we have managed your personal information?
- Where to get more information.

2. What personal information does Aliro collect?

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

Aliro 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, the *Anti-Money Laundering and Counter-Terrorism Financing Act (AML/CTF Act)*. If we do 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 determine what information we will collect about you. The kinds of personal information that we may collect and hold about you include:

- full name, date of birth, gender and contact details including telephone, address, e-mail and fax;
- a copy of your driver licence and/or passport or other identification documentation for the purpose of verifying identity and to ensure compliance with the AML/CTF Act and/or other legislation and regulations regarding identification verification, and tax reporting and withholding;
- your tax file number (TFN) and bank account details for the purpose of administering investor accounts and tax reporting and withholding;
- investor contribution details and investment choice;
- details about authorised signatories on your investments or accounts with us;
- detailed contact information about your financial adviser; and
- copies of any relevant trust deed, partnership agreements or constitutions, which may be relevant to comply with the AML/CTF Act.

In addition, we may collect personal information about individuals who are not customers of ours (e.g. business contact details of a company representative with whom we deal).

In the context of our 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, accreditations, media, directorship, property ownership and driver's licence information, education, employment history and credential variation. In the employment context, we may also collect and hold your TFN, financial information and banking details.

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. If we need sensitive information, we will ask for your consent when we collect this information (unless an exemption applies).

3. How does Aliro go about collecting and storing personal information?

Collecting information

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.

We may also collect information about you from third parties. For example, Aliro may collect personal information from:

Your authorised representatives and advisor(s);

- Our service providers;
- Your employer;
- Our corporate clients, where we are providing services to them;
- Referees, in the case of prospective employees.

Collecting information from visits to our website

If you use our website, we have the capacity to collect the following types of information for statistical purposes:

- the number of users who visit the website;
- the number of pages viewed; and
- traffic patterns.

This statistical data is anonymous and we will not make any attempt to identify users or their browsing activities. We will use this data to evaluate our website performance and to improve the content we display to you.

Other information, such as browser type, is included in a 'cookie' that is sent to your computer when you complete certain tasks on our website. A cookie contains bits of information that enables our servers to identify and interact efficiently with your computer. Cookies are designed to provide a better, more customised website experience, and to make it easier for you to use our website. You can configure your computer to accept or reject cookies.

Where necessary, we will remind you that the internet is an unsecure medium.

Securing your personal information

We hold personal information in secure computer storage facilities (both in-house and at our service providers); on paper-based files; as well as in other formats. Aliro takes all reasonable steps to protect your information from loss, unauthorised access, destruction, use, modification or disclosure. Our access to your personal information 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.

Where vendors engaged by us are required to administer personal information, we will take appropriate steps to ensure that similar measures are in place to secure your personal information.

4. For what do we use personal information and how is it disclosed to others?

Generally, we only use and disclose information for the purpose for which it was disclosed to us or related purposes which would reasonably be expected. Those purposes generally include:

to establish and administer your investment or account and your relationship with us;

- for communication purposes including surveys and questionnaires;
- to comply with our record-keeping, reporting, and tax obligations;
- to protect legal rights and comply with legal obligations;
- to prevent fraud and abuse;
- for quality assurance and training purposes;
- to enable us to provide information about new and existing products and services that will enhance our relationship with you. However, we do respect the right of individuals to ask us not to do this; and
- to handle any relevant enquiries or complaints.

We have certain legal requirements which compel us to disclose personal information. For instance, we may be required to provide details to:

- Australian Government regulators such as the Australian Securities and Investments Commission, the Australian Tax Office, the Australian Transaction Reports and Analysis Centre and to other regulatory or government entities;
- the Australian Financial Complaints Authority (AFCA);
- as required by a court order (including in Family Law matters); and
- other regulatory or governmental entities outside of Australia where compelled to by Australian laws or regulations, for example the Foreign Account Tax Compliance Act or Common Reporting Standard requirements.

To meet our investors' needs and provide some investor services, such as administration of accounts and mailing of investor distribution statements, it may be necessary to release information or provide access to external service providers, for instance:

- to any organisations involved in providing, managing or administering our products systems or services such as custodians, registries, administrators, mail houses and software and information technology providers;
- to auditors, consultants and other professional advisers;
- to your financial adviser;
- to a legal personal representative, attorney or any other person who may be entitled to receive the proceeds from your investment or account with us;
- to other financial institutions who hold an account in an investor's name, for example, where amounts have been transferred to or from that account; and
- to authorities investigating (or who could potentially investigate) alleged fraudulent or suspicious transactions in relation to an investment or account.

Information about you or your dealings with us is not and will not be sold to any other company, individual, or group, whether in Australia or overseas.

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, we 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 can complain if you have concerns about how we have managed your personal information?

If you have a complaint related to how Aliro has managed your personal information, please contact us using the contact information below. We may ask you to place your concerns in writing in order for us to fully understand and investigate the issues you have raised. We will acknowledge any complaint in writing within five business days and we will respond to a privacy related complaint no more than 30 days after receiving it.

If a complaint remains unresolved, you may access an external dispute resolution service or apply to the Office of the Australian Information Commissioner (OAIC) to have the complaint heard and determined. The Commissioner may be contacted on the privacy hotline: 1300 363 992.

When we write to you about our decision, we will explain how you may access an external dispute resolution scheme or make a complaint to the OAIC.

7. Need more information?

If you have any questions about this privacy policy, if you wish to complain about how we handled personal information about you, or if you wish to access or correct your personal information, please contact Aliro's Chief Operating Officer:

Chief Operating Officer
Aliro Group Pty Limited
Level 38, 1 Macquarie Place
Sydney NSW 2000

T: 1300 310 085

E: info@aliro.com.au