

## Privacy Policy

Updated: 11 March 2020

This Privacy Policy ('Policy') applies to information collected by Assetsecure Pty Ltd ABN 13 110 953 618 and its related bodies corporate ('Assetsecure' or 'we'). This policy outlines how we manage your personal information and safeguard your privacy.

At Assetsecure, we understand your concerns about privacy and the security of your personal information. Your privacy is important to us and we are bound by the Privacy Act 1998 (Cth) and the Australian Privacy Principles ('APPs'). We are committed to protecting the personal information that we hold about you.

### What personal information is collected?

Assetsecure collects personal information that is reasonably necessary for us to provide you with financial products and services and to administer them. The kind of personal information we collect and hold will depend upon the type of products and services that you request from us and may include:

- information you give us when you request a product or service from us. This information may include your name, date of birth, address, contact details, bank details and relevant identification documents;
- communications between us and your financial, legal or other adviser, or your broker or agent;
- communications between us and associations that you are a member of and with which we have an affiliation;
- transactional information about the use of a product if you have or had a product with us;
- financial information about you such as your financial position and information obtained from credit checks if you have authorised us to carry out those checks;
- in some cases, sensitive information (e.g. relating to your personal health, racial or ethnic origin);
- the name, contact details and date of birth of any individual acting as a guarantor in relation to a product or service we have provided to you; and
- employment history and contact details, if seeking employment or contracting opportunities with us.

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#### Corporate

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[www.assetsecure.com.au](http://www.assetsecure.com.au)

#### Sydney

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Level 28, 25 Bligh Street  
Sydney NSW 2000

#### Melbourne

† +61 3 9221 6358  
Level 27, 101 Collins Street  
Melbourne VIC 3000

#### Brisbane

† +61 7 3121 3010  
Riparian Plaza, 71 Eagle Street  
Brisbane QLD 4000

Assetsecure collects sensitive information where required by law or where the collection has been consented to. Sensitive information may also be collected and disclosed to employee screening agencies for background checking purposes if you are seeking formal employment with Assetsecure.

### **How personal information is collected?**

Assetsecure usually collects your personal information in a number of ways including:

- directly from you (including via your financial, legal, or other adviser, or your broker or agent), such as when you provide the information by phone, email or in an application form, or when you participate in a survey, promotion or competition;
- from our related companies where permitted by law;
- from third parties such as your financial adviser, lawyer or other agents or credit reporting agencies, credit providers, or identity verification service providers, if you authorise us to do so; and
- from publicly or commercially available sources for the purpose of complying with customer due diligence obligations under relevant legislation (e.g. anti-money laundering laws).

### **What if you do not provide certain information?**

If you provide us with an incomplete application, we may not be able to provide you with the product or service until the application is complete.

If you do not provide us with all relevant identity verification documents, or adequately satisfy electronic identity verification requirements, we may not be able to provide you, or continue to provide you with the product or service.

If you choose not to disclose your Tax File Number ('TFN'), TFN exemption or Australian Business Number ('ABN'), we may have to deduct tax at the highest marginal rate (plus the Medicare levy) from distributions or income payments made to you.

If you choose not to disclose your account details or correctly answer verification questions, we may not be able to process transactions requested.

## **Use and disclosure of your personal information**

Assetsecure may collect, use and disclose your personal information for the primary purpose of providing the products and/or services requested, as well as for related purposes such as:

- to verify your identity or transactions which you may enter into with us (including the identities of third parties connected with your product/service application, such as beneficial owners, where applicable);
- to process your applications for our products and services;
- to administer and manage the provision of our products and services;
- to respond to queries, complaints or to provide you with our general customer services;
- to provide your nominated financial adviser or other agent with details of your investment;
- to confirm your membership of an association with which we have an affiliation;
- to assess credit which you seek from Assetsecure and to administer any credit Assetsecure provides to you, including providing your nominated broker with details of your loan;
- to comply with laws and regulatory requirements, including anti-money laundering, financial services and taxation laws, or complying with any request made by a governmental authority in connection with legal proceedings or the prevention or detection of fraud and crime;
- to comply with Assetsecure's risk management policies and procedures;
- to conduct product and market research;
- to train our staff;
- if applying for employment with Assetsecure, to complete appropriate background checks; or
- to provide you with offers of other Assetsecure products or services and to improve and personalise our products and services;
- to provide you with offers from organisations with whom we have an alliance;
- if attending our offices in person, to assist Assetsecure in providing a safe and secure environment for employees and visitors.

We may disclose your personal information to:

- your financial, legal or other adviser, or your broker or agent;
- professional service firms that provide services to us, such as, legal and audit services or data or information services;
- electronic identity verification service providers in order for identity information (about you or related persons connected with your product/service application) to be verified against relevant government and other databases, for the purpose of complying with anti-money laundering laws;
- a financial institution with whom we have a branding arrangement;
- reinsurers;
- our related companies; or
- organisations with which we have an association and you are a member, and otherwise in accordance with this Privacy Policy and the APPs.

### **Use of service providers**

We may contract out some of our administrative and support functions such as mailing, settlement services, administration services, document and data storage or identity verification services to external service providers from time to time. Only information necessary for the service provider to carry out their function will be provided and will be subject to confidentiality clauses in the relevant services agreement.

### **Keeping us up-to-date**

Personal information such as your contact details may change from time-to-time and we ask that you keep us informed of any changes by notifying us. Changes to some details, such as a change of name, may require additional documentation to verify the change. Where you have previously provided information about another person related to your product or service (such as a guarantor or beneficial owner) and the information is no longer current, you must provide up-to-date information. Additionally, some changes may be required to be made on a specific form (such as a change of bank account from which direct debits are deducted). Assetsecure is unable to change any account details or provide any policy specific information through email. To change your contact information please contact us on 02 8089 0700.

Please see the 'Contacting us' information below if you would like to request an update to the personal information we hold about you or a guarantor (if applicable).

## **Storage and security of information**

Assetsecure stores personal information in a combination of computer storage facilities, paper-based files and other records. These are held on our premises and systems as well as offsite using trusted third parties. Some personal information may be held by data service providers located overseas (such as 'Cloud' service providers for data storage and management purposes). In such cases, Assetsecure maintains effective control of the information under contractual arrangements. We will take reasonable steps to protect personal information from loss, interference or misuse, and unauthorised access, modification or disclosure.

Where personal information is no longer required to be retained, we will take such steps as are reasonable in the circumstances to de-identify the information or put it beyond use.

## **Openness**

This Privacy Policy sets out Assetsecure's policies on the management of personal information and is made freely available on our website, or in hardcopy if requested.

## **Access and correction**

Generally, Assetsecure will provide you with access to your personal information that we hold, unless a particular exception applies, such as where:

- it would be unlawful to provide the information;
- providing access would be likely to prejudice an investigation of possible unlawful activity;
- the information is relevant to legal proceedings and would not be accessible in the normal discovery process;
- giving access would have an unreasonable impact on the privacy of other individuals;
- it would pose a serious and imminent threat to the life or health of any individual; or
- the request is frivolous or vexatious.

If a request for access would divulge a commercially sensitive decision-making process, then Assetsecure may provide an explanation rather than direct access to the information.

If we become aware that the personal information we hold about you is inaccurate, incomplete, misleading or irrelevant, then we will take reasonable steps to amend it. If we receive a request from you to correct your information, then we will seek to correct it within 30 days. If you and Assetsecure disagree about the accuracy, completeness or currency of our records, then you have the right to request that we note your disagreement on those records.

Please see the 'Contacting us' information below if you would like to request an update or seek access to the personal information we hold about you.

## **Identifiers**

Assetsecure does not use any government-issued identifiers (such as TFNs, Medicare numbers and Drivers Licence numbers) for use as its own identifier. Instead, Assetsecure issued numbers such as product or service account numbers are used to identify individuals and the Assetsecure products and services they obtain.

## **Anonymity and pseudonymity**

Given legal requirements on financial institutions to identify their customers, in most situations Assetsecure is unable to allow you to transact with it on the basis of anonymity (including the use of pseudonym). Access to the Assetsecure public website and some other interactions with Assetsecure may be done anonymously, or in the case of general enquiries, using a pseudonym. However, we may not be able to respond to your queries unless you provide us with certain information.

## **Overseas disclosures**

Assetsecure does not disclose personal information to recipients in foreign countries. In some cases, Assetsecure may utilise 'Cloud' storage solutions for data storage purposes and the relevant servers may be located overseas. Please see the 'Storage and security of information' section of this policy for further details.

## **Direct marketing**

We do not collect, use or disclose your personal information for the purpose of direct marketing of our, or any third party's, goods or services to you.

## **Changes to our Privacy Policy**

Assetsecure may make changes to this Privacy Policy from time to time for any reason and we will update the website in a timely manner.

## Contacting us

If you would like more information about how we manage your personal information, our Client Services team is available Monday to Friday, from 9am to 5pm EST, and can be contacted on 02 8089 0700 or write to us at the following address:

The Privacy Officer  
Assetsecure Pty Ltd  
Level 28, 25 Bligh Street, Sydney NSW 2000

Or send an email to: [admin@assetsecure.com.au](mailto:admin@assetsecure.com.au).

## Complaints about your privacy

If you wish to raise any concerns about any breach or potential breach of your privacy, please contact our Privacy Officer and we will make every effort to resolve your complaint internally. If you wish to raise a concern, you should be aware of the following;

- your complaint should be made in writing to the Privacy Officer (via post or email)
- we will attempt to respond within 30 days from receipt of your request
- if you feel your concerns have not been resolved, you may take them to an external dispute resolution service (such as the Australian Financial Complaints Authority (AFCA))
- AFCA provides fair and independent financial services complaint resolution that is free to consumers. There are some time limits for lodging certain complaints, please consult the AFCA website to find out if or when the time limit relevant to your circumstances expires
- the complaint may be taken to the Office of the Australian Information Commissioner (OAIC).

For more information on how you may lodge a complaint with the OAIC, please contact the OAIC hotline service on 1300 363 992 or email [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au).

## Use of our website

We will collect some information from you when you visit the Assetsecure website. Your use of the facilities and services available through the website will determine the amount and type of information that we will collect about you. Some of this information will not be personal information because it will not reveal your identity.

The only personal information which we collect about you when you use the website is what you tell us about yourself; for example, by completing an online form such as an application form or by asking for a disclosure document for our products or by sending us an email. We will record your email address if you send us an email.

## **Employment opportunities at Assetsecure**

If you are seeking employment or contracting opportunities with Assetsecure, we will collect personal information from you and, where applicable, from any referees you have provided to us during the recruitment process. We may also collect sensitive information about you as part of our background checking process (with your consent). This information may be disclosed to (and obtained from) third party agencies that we engage to conduct screening checks on our behalf. Personal information gathered during the recruitment process will only be used to assess your suitability for the relevant role, and if you are not the preferred candidate, your information may be retained to assess the suitability for roles offered in the future.