

Privacy Policy

General Statement:

Burrell Stockbroking Pty Ltd ABN 82 088 958 481, AFSL No 247431 (referred to as “Burrell Stockbroking”, “Burrell”, “Burrell’s”, “we” and “us”) and its related entities recognises that the privacy of your personal information is important to you and as part of our commitment to customer service, Burrell is committed to protecting the privacy of any personal information it collects from you. Unless you give us your consent to do otherwise, we will only collect and use your personal information in accordance with the policy set out below.

Burrell Stockbroking abides by the Australian Privacy Principles (“APPs”) under the Privacy Act 1988 (Cth). This Privacy Policy outlines Burrell’s approach to the handling and management of your personal information, consistent with the Privacy Act 1988 and the APPs. You can obtain information about the APPs and your privacy rights at the website of the Office of the Australian Information Commissioner: <http://www.oaic.gov.au>

This Privacy policy is aimed at assisting you to understand:

- The types of information we collect and hold
- The purposes of which we collect, hold, use and disclose personal information
- How we protect and handle the personal information we collect when providing you with a financial service or product or after your financial service or product is terminated
- How you may access the personal information that we hold about you and seek the correction of that information
- How you may complain if you are not satisfied with the way in which we handle your personal information and how we will deal with complaints
- When and how we may disclose personal information to overseas recipients and in which countries they are likely to be located.

The personal information we collect

We collect personal information about you that is necessary for us to conduct our business and to build our relationship with you including to:

- Provide you with financial services or products
- Consider applications or approaches you make to us
- Maintain your contact details
- Fulfill our legal obligations such as those that arise under taxation and anti-money laundering and counter-terrorism laws and regulations.

Personal information is any information that can be used to personally identify you and/or contains information or an opinion about you ("personal information"). The types of personal information we generally collect and hold relates to:

- Your name, date of birth, contact details (address, telephone numbers, email address, other contact details) and identification information, including those issued by government agencies such as a driver's licence number;
- Your tax file number and bank account details;
- Your employment details and occupation;
- Your financial position and investment objectives and the financial products and services we have provided. Details of your financial information, such as:
 - securities holdings;
 - assets;
 - income;
 - superannuation details;
 - financial needs and objectives;
 - financial circumstances; and
 - investment preferences and aversion or tolerance to risk;

Where relevant we may ask for other information, for example, qualifications, employment and criminal history if you are applying for employment with us.

Sensitive information

We will collect information about your health when we are applying for insurance on your behalf or to administer or assist with a claim under a policy. We will not otherwise generally collect sensitive information about you unless you provide your consent or we are required to do so by law. Sensitive information includes information relating to your health, race, political or religious beliefs, sexual preferences, criminal convictions or your membership of professional or trade associations or unions.

How we collect and hold your personal information

Generally, we collect personal information in the following ways:

- Directly from you, either in person, in documents, by email, telephone, facsimile, or via the Burrell Stockbroking website;
- By your adviser, during face to face interviews, telephone, discussions or email communications;
- From third parties, such as your accountant, other financial advisers or stockbrokers, financial institutions such as banks, superfund administrators including Self-Managed Superannuation administrators, platform and managed fund providers, where we have established accounts or other facilities in your name, business associates and business counterparties, overseas agents, and solicitors;
- We may also collect personal information about you when you attend our seminars or presentations and we film or record those events;
We hold personal information in hard copy and electronic files.

Collection of information from the Burrell website

While it is not necessary to register your personal details to use our Web site, we do offer a registration service that will enable you to receive product and service updates, newsletters and other information. In the event you do register with us, we will collect personal information from you including your name and e-mail address.

If you have registered with us and decide, at any time, that you do not wish to receive any further information from us, you can send an e-mail to info@burrell.com.au requesting to be removed from our online registration database. Please allow 14 business days for your request to be actioned.

You may amend or update your registration details by sending an e-mail to the above e-mail address providing your amended details. Please allow 14 business days for your request to be actioned.

Our Web site uses cookies, both session and persistent, which allows us to identify your browser while you are using our site and the patterns you use to reach our site. Cookies do not identify you; they simply allow us to track usage patterns so that we can measure the level of interest in various areas of our site to help us better tailor out services to you. For example, we may do this when you click on a link from our website or visit a website which displays an advertisement for Burrell. We use cookies for analytical, advertising, social networking and necessary browsing purposes. However, if you log into our secure client portal or access our website from a personalised communication from us, we may be able to identify you. You may configure your web browser to accept or reject cookies, or identify when cookies are being sent. However, if you disable the use of cookies or remove or reject specific cookies from our website you may not be able to gain access to all of the content on our website.

As part of our marketing strategy we use Google Analytics. Google Analytics gives us a greater insight into usage patterns. Google Analytics uses cookies. For more information about the specific cookies used by Google Analytics please visit www.google-analytics.com.

Our website may also contain external libraries, for example from social networking companies. These issue cookies through our website, however, are used by external companies for their own purposes. Please note that cookies do not identify you, they track usage patterns. Your internet service provider should be able to assist you to set your preferences to block these cookies.

Collection of information from Burrell emails

We use information collected through email for internal statistical and marketing purposes. We use a third party product that allows us to track certain information regarding emails we send. This product does not use cookies, rather there is technology embedded in the email that allows us to track:

- who opened an email, who didn't open an email, if an email bounced, who marked an email as spam;
- who opened a link in an email, what link was opened, and how many times the link was opened;
- if you forwarded an email, or if you shared an email on social media sharing; and
- the email service provider you use to read the email.

The tracking technology embedded in the email will allow us to identify you via any email address you have provided to us.

This product is CAN-SPAM Compliant, allowing you to unsubscribe through any email sent to you.

Burrell Stockbroking links to other websites

Sometimes the Burrell Stockbroking website may contain a link to third party websites. We are not responsible for the content or material contained in, or obtained through, any third party website or for the privacy practices of the third party website. We suggest that you review the privacy policy of each website that you visit.

Purposes for collecting your personal information, and the consequences of not providing us with the information requested

Generally, we collect personal information about you:

- to provide you with a range of financial products, services or advice, to meet our obligations to you and to enable us to conduct our business; and
- as required under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth).

We also collect personal information so you can seek employment with us or communicate with us in writing, by e-mail, telephone or via the Burrell Stockbroking website.

If you do not give us the requested personal information, or if the information you give us is incomplete or inaccurate, we may be delayed or prevented from providing you any financial products, services or advice, carrying any transaction for you, providing information to you, processing any application or otherwise meeting our obligations to you.

We may use the personal information collected from you for the purpose of providing you with material that may be of interest to you, however you may request not to receive such information and we will give effect to that request. We will action that request as soon as practicable.

Tax residency status

We may be required to ask you about your tax residency status under taxation information sharing agreements or treaties the Australian Government has in place with other countries. The relevant treaty or law may require us to collect your foreign tax identification number or to provide other personal information about you to overseas regulators or authorities.

How we use your personal information

We use the information we collect primarily to provide you with a range of financial products, services or advice, to meet our obligations to you and to enable us to conduct our business, including:

- providing you with stockbroking, financial planning and superannuation services; carrying out investments on your behalf as well as managing and reporting to you on your investments;
- Administer your accounts and perform other administrative tasks including reporting on your investments, risk management, systems development and testing, staff training, collecting debts and conducting market research;
- providing back office, clearing and settlement services to you;
- establishing accounts or other facilities, including banking facilities, on your behalf with third party financial institutions, and administering your accounts or other facilities;
- conducting our internal business operations (including meeting any relevant legal requirements);
- managing client relationships and improving the services we provide;
- providing you with up to date information about financial and superannuation products and services we offer or events through the Burrell Bourse, broadcasts and other promotional materials;
- prevent or investigate any actual or suspected unlawful activity and
- assessing applications for employment.

Disclosing personal information

We do not sell personal information to other organisations.

However, from time to time, we may share your personal information with other entities within Burrell. We may also provide your personal information to third parties in accordance with this policy.

We will only disclose personal information for the purposes for which it was collected or in the following circumstances:

- Internally to our staff;
- To our related bodies corporate;
- To any financial or investment adviser that you nominate or who refers you to us, including to financial institutions where we may establish accounts or other facilities on your behalf;
- To our professional advisers such as Self-managed superannuation fund administrators, auditors, accountants and lawyers, insurance companies, consistent with normal business practices;
- To third parties we may engage from time to time to assist us in the promotion of our products and services, and who may receive limited personal information for that purpose;
- To external service providers in Australia, United States, United Kingdom, Singapore, Canada, Switzerland, New Zealand, Malaysia and Luxembourg (on a confidential basis) so they can provide us services related to our business, for example international share execution, mailing services, IT services, unit registry and custodial services, archives services. Additionally, some client information is held in cloud data storage provided by Microsoft. Microsoft is headquartered in the USA, but maintains storage facilities worldwide;
- Your employer if your superannuation is invested in an employer sponsored corporate superannuation;
- Any fund to which your superannuation benefits are transferred or rolled over;
- Where required or authorised by law; and
- Where you consent to the disclosure.

Where applicable we may rely on employee and related bodies corporate exemptions that are available to us under the Privacy Act when using or disclosing personal information.

Cross-border disclosure of personal information

From time to time, some of our third party contractors and service providers may perform certain services overseas. As a result, your personal information may be disclosed to organisations located overseas. Typically, custodians, brokers or investment managers who may hold or deal in non-Australian assets such as international equities on our behalf for you in jurisdictions such as the United States, United Kingdom, Singapore, Canada, Switzerland, New Zealand, Malaysia and Luxembourg. For example, if we buy or sell international securities on your behalf, some personal information may be disclosed to the overseas service provider in order to process the transaction.

Further, we may use external service providers overseas so they can provide us services related to our business, for example mailing services and IT services. If we disclose your personal information overseas, we ensure reasonable steps are taken, to ensure that your personal information is treated in accordance with the Australian standards, to the extent that those standards are compatible with the domestic law of the relevant jurisdiction ("the Obligation").

The Obligation does not apply if you consent to the disclosure of your personal information to an overseas recipient.

By supplying personal information to us, you consent to the disclosure of your personal information to an overseas recipient and agree that the Obligation does not apply.

Security of your personal information

We aim to protect your personal information from misuse and loss and take reasonable steps to ensure that your personal information can only be accessed by people properly authorised to have access. We may store your personal information in hard copy documents or electronically. We maintain physical security, such as locks and security systems, over our premises. We also use technology to maintain the security of our computer network and employ firewalls and other security measures such as passwords to control access to our computer systems. Where we store your personal information on computer servers maintained by third parties we take reasonable steps to be satisfied that those third parties use technology to keep your information secure.

How to protect your privacy

There are inherent risks in transmitting information through the internet. You can help us to protect your privacy by observing our security requirements and contacting us immediately if your contact details change. We require you to:

- keep your passwords and user names confidential and secure at all times
- take reasonable steps to ensure that the computer, mobile device or email account that you use to interact with us stay secure such as by using anti-virus/malware software on personal devices and avoiding the use of public computing facilities (internet cafés)
- not to share your passwords or user names with any third party and to change them regularly
- let us know immediately if you believe your security measures have been compromised.

How long we hold your information?

We are required by law to retain certain types of information for varying lengths of time. Depending on the particular circumstances, we may be required to retain business records which include your personal information from a period of 7 years to indefinitely. Where we are not required to retain your personal information by law or to administer our relationship with you, we will take reasonable steps to permanently destroy or de-identify your personal information when it is no longer required for the purpose for which it was collected.

Accuracy of your personal information

We will take reasonable steps to ensure that all personal information we collect or use is accurate, complete, up-to-date, relevant and not misleading.

If any of your details change, please let us know as soon as possible by using the contact details below so we can maintain the accuracy of your personal information.

How you can access and correct your personal information that we have stored

You can contact us to request access to your personal information and we will (subject to the following exceptions) provide you with access to that information. We will provide you access either by giving you copies of the information requested, allowing you to inspect the information requested or providing you with an accurate summary of the information held. We will, prior to providing access in accordance with this policy, require you to provide evidence of your identity.

There is no fee for making a request to access your personal information but we may charge a fee for giving you access to your personal information in a mutually agreed format, usually by sighting the accessible information held on file.

We will not provide you with access to your personal information where the *Privacy Act 1988* (Cth) or the APPs allow us to refuse to do so. Situations where we may refuse you access to your personal information include, but may not be limited to, where:

- 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;
- we suspect that unlawful activity of a serious nature has been engaged in, and that allowing access could prejudice any future investigation.

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

How you can correct your personal information

If you believe that the personal information that we hold is inaccurate, incomplete, out of date, irrelevant or misleading, you should contact us. We will promptly update any personal information that we hold which is inaccurate, incomplete, out-of-date, irrelevant or misleading. If we do not agree to update your information, we will provide you with our reasons. We will also tell you what you can do if you are not satisfied with our response.

How to manage contact from us

From time to time we may send you invitations to seminars, events, offers to use our services, and other advertising and promotional material. You are able to unsubscribe from such communications by contacting our Privacy Officer (details below). Please note that where you use our services we are required by law to send you information from time to time. Although you may unsubscribe from advertising and promotional material, you may not be able to unsubscribe from certain communications.

How to contact Burrell Stockbroking

If you have any questions of how we handle your personal information or believe that your privacy has been compromised, you can contact our Privacy Officer as follows:

Email: info@burrell.com.au

By phone: 07 3006 7200 be considered within 30 days and responded to.

It is our intention to use our best endeavors to resolve any complaint to your satisfaction.

Complaints Procedure

If you have a complaint about how your personal information was handled or believe that your privacy has been compromised, please contact:

Compliance and Complaints Manager

Mail: Burrell Stockbroking Pty Ltd

GPO Box 1398

Brisbane QLD 4001

Online: Burrell.com.au

Email: info@burrell.com.au

If you are not satisfied with the way in which we handle your enquiry or complaint, you may be eligible to refer the complaint to Office of Australian Information Commissioner (OIAC) (www.oaic.gov.au) or the Australian Financial Complaints Authority (AFCA) of which we are a member (www.afca.org.au).

Office of Australian Information Commissioner (OIAC)

Mail: GPO Box 5218

Sydney NSW 2001

Online: oaic.gov.au

Email: enquiries@oaic.gov.au

By phone: 1300 363 992Fec

Australian Financial Complaints Authority

Mail GPO Box 3

Melbourne VIC 3001

Online: www.afca.org.au

Email: Info@afca.org.au

By phone: 1800 931 678

Changes to this privacy Policy

This is our current Privacy Policy outlining our personal information management practices. This Policy replaces any other privacy policy published by us to date. We may vary this policy from time to time. We encourage you to review the Burrell Stockbroking website regularly to ensure that you are aware of our current Privacy Policy.

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