



GROUP PRIVACY POLICY
DECEMBER 2018



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Policy Owner	Sargon Capital Pty Ltd
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Next scheduled Review	December 2020
Regulator	Office of the Australian Information Commissioner

1. Statement of Policy

1.1. Objectives

This Privacy Policy deals with the collection, security, use and disclosure of personal and credit information gathered by us, Sargon Capital Pty Ltd (ACN 608 799 873) and our subsidiary companies (Sargon Group) pursuant to the Privacy Act 1988 (Cth) (Privacy Act) including the Australian Privacy Principles (APPs) and Part IIIA (Credit reporting).

The Sargon Group is committed to ensuring the confidentiality and security of any of your personal information that is disclosed to the Sargon Group. The Sargon Group Companies act in various legal capacities which may include as one or more of the following: Australian Financial Services (AFS) Licensee, Responsible Entity (RE), credit provider, and Registrable Superannuation Entity (RSE) Licensee.

1.2. Application

The terms “we”, “us” or “our” used in this Sargon Group Privacy Policy (Policy) mean the Sargon Group as a whole or any individual entity or entities within the Sargon Group, depending on the context. This Policy explains how the Sargon Group may collect, use, share and retain information about you and the choices you have in relation to the collection and use of your personal information.

1.3. Amendments

This Policy applies to all directors, employees, contractors, and subsidiary companies of the Sargon Group. Some entities within the Sargon Group will have their own privacy policy, or privacy policy addendum, in place. In the event that a provision within an entity's privacy policy is inconsistent with this Policy, this Policy will take precedence over the entity's privacy policy to the extent of the inconsistency.

Any amendments to this Privacy Policy will be notified to you by posting an updated version to our website.

2. Collection of Personal Information

The Sargon Group collects personal information through a variety of methods and contact points in the course of its business. In some cases, we may also collect personal information through third parties or intermediaries.

The type of information collected may include the following:

- Name, gender and date of birth;
- Contact details;
- Employment details such information relating to your remuneration, superannuation contributions and employment status;
- Accounting records;
- Tax File Number and taxation records;
- Statements of financial position regarding assets and liabilities;
- Nominated beneficiaries of a superannuation fund;
- Attitudes to investment risks;
- Information on your family members and partners, eg. details on next of kin, family details; and
- Details relating to some related personal interests, eg.

charitable interests.

If we provide a credit service, we may collect and hold the following credit information:

- identification information- name, date of birth, current or previous address, driver's licence number;
- type and amount of credit sought;
- trade references – name of entity, ABN, contact name, telephone number, fax number, email, years trading with you;
- publicly available information about an individual's creditworthiness;
- consumer credit liability information- name of credit provider, type of consumer credit, details of the consumer credit provided;
- default information;
- repayment history information;
- payment information in relation to an overdue payment; and
- other information we require in order to provide a service to you.

When you visit our website, we may use “cookies” or similar technologies to collect data. A cookie is a small file, typically of letters and numbers, downloaded on to a device when you access our website. Our website collects the following information from users:

- your server address;
- your top level domain name (for example, .com, .gov, .au etc);
- the date and time of your visit to the site;
- the pages you accessed;
- the previous site you have visited; and
- the type of browser you are using.

In addition, we may have to collect certain information about you where we are required to do so by law. This includes Australian Anti-Money Laundering law, which affects financial institutions, and requires us to collect personal information to verify your identity, prior to providing certain services to you.

Other personal information relating to an individual may be collected by or on behalf of an entity in the Sargon Group in providing its products and services, or through its website or third parties.

All personal information collected by the Sargon Group is treated as confidential and collected only when required for the provision of a product or service offered by a member of the Sargon Group. If we are not able to collect personal information from you, or you choose not to disclose personal information to the Sargon Group, we may not be able to provide our services to you.

By providing us with your personal and/or credit information, you are agreeing to be bound by the Privacy Policy.

2.1. Anonymity

The Privacy Act allows you to choose to remain anonymous or use a pseudonym in your dealings with the Sargon Group. For example, you may choose not to provide your name or contact details if enquiring about a product or service.

However, this option will not be available to you where it is impractical for us to provide a service or product without verifying your identity.

We comply with our obligations under the Anti-Money Laundering legislation and will act in accordance with any relevant Anti-Money Laundering and Counter-Terrorism Financing policies.

2.2. Unsolicited Information

There may be instances where an entity within the Sargon Group comes into possession of personal information that it has not requested.

If this occurs, we may be permitted to record or use this information if the information could have been collected through the ordinary course of our business. However, if the information would not have been collected through the ordinary course of our business, we will destroy or de-identify any information.

3. Management of Personal Information

Personal information that is collected may be stored electronically or in hard copy form. Such personal information may be held directly by us or by an administrator, or by a third party, which we have engaged to provide services.

We have implemented processes and systems to ensure personal information is protected and used only for the purposes for which it was collected. This acts to prevent the unauthorised use or disclosure of personal information to third parties by ensuring:

- Database access is controlled, and third party agreements reflect privacy law obligations;
- Internal access to client records and databases is restricted based on employees' roles and responsibilities;
- Authorisation processes are in place for changes in access;
- Password encryptions apply; and
- Client records in hard copy format are secured and archived where appropriate.

In cases where we are no longer required to maintain records, personal or sensitive information, including credit information, held by us will be promptly and securely destroyed or de-identified (or where the records are held by a third party, we will take reasonable steps to ensure the personal information is destroyed or de-identified).

4. Use and Disclosure of Personal Information

We collect, hold and disclose your personal and credit information for the following purposes:

- as a necessary part of providing our goods and services to you;
- to promote and market our products and services to you or provide you with information that we believe may be of interest to you (unless as directed otherwise);
- to personalise and customise your experiences with our websites;
- to help us research the needs of our customers and to market our goods and services with a better understanding of your needs and the needs of customers

generally;

- to allow us to provide advertising material to you regarding us, our clients, and other business partners (unless as directed otherwise); and
- other purposes related to any of the above.

We will only use your information for the purposes for which it was collected (**primary purposes**) or a purpose related to the primary purpose, if this use would be reasonably expected by you, or otherwise, with your consent. Where we are provided personal information for recruitment purposes, this information may be confidentially disclosed to authorised personal within the Sargon Group for this purpose.

4.1. Disclosure to Third Parties

We may disclose your information to necessary third parties, who assist us to provide, manage and administer our goods and services. Information provided to third parties will be dealt with in accordance with that entity's privacy policy. People we may disclose your information to include:

- third parties that provide goods and services to us or through us;
- third parties, such as marketing and digital agencies, who may send to you our e-newsletters on our behalf;
- our website host or software application providers; and
- other organisations listed as trade references in a credit application.

We will only disclose your personal information to a third party if:

- you have provided consent to the disclosure; or
- the disclosure is related to the purpose for which it was collected; or
- it is required by law or order of an Australian court or tribunal; or
- exceptional circumstances apply, such as an imminent risk to health or of criminal activity.

For example, we are permitted to provide personal information to a third party broker to execute a trade for a client's portfolio. Provided the disclosure is only of information relevant to the service, this will relate to the primary purpose for which the information was collected which was the provision of an investment management service to the client.

We may need to share some of your information, including credit information, with organisations outside of Australia. Overseas recipients are likely to be located in the Philippines. We may also store your information in networked or electronic systems, such as the cloud. Because the cloud can be accessed from various countries through an internet connection, it may not always be practicable to know in which country your information is held. If your information is stored in the cloud, disclosures may occur in countries other than the Philippines.

We will not disclose information to an overseas recipient unless:

- we have taken reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles,
- we have obtained consent from the individual, and/or
- the disclosure is required or permitted by law.

5. Client Access

This Policy is published on our website www.sargon.com.au.

When receiving a request to provide the Privacy Statement, we will do so promptly and free of charge where possible. We will endeavour to provide the Policy to you in a format that is convenient (for example, in printed form or via email).

5.1. Providing Access to Personal Information

You are entitled to have access to and seek correction of any personal information that we may hold about you. We require that requests for access to or to update or correct your personal information to be in writing outlining the details of your request. Such requests should be addressed to the Privacy Officer via the details provided in this Policy.

We will take appropriate steps to verify your identity (or verify that you act as an authorised agent of the individual concerned) before granting a request to access your personal information.

We will respond to your request for access to your personal information within a reasonable time after you make the request and if access is granted, access will be provided within 30 days from your request. We will, on request, provide you with access to your personal information or update or correct your personal information, unless we are lawfully excluded from granting your request, including if:

- giving access would be unlawful;
- we are required or authorised by law or a court/tribunal order to deny access; or
- giving access is likely to prejudice one or more enforcement related activities conducted by an enforcement body.

Where your request for access is accepted, we will provide you with access to your personal information in a manner, as requested by you, providing it is reasonable to do so.

Your request for correction will be dealt with within 30 days, or such longer period as agreed by you. If we deny your request, we will provide you with a written notice detailing reasons for the refusal and the process for making a complaint about the refusal to grant your request.

We will accept your request for correction of your credit information where we are satisfied that it is inaccurate, out-of-date, incomplete, irrelevant or misleading.

Upon accepting a request for correction of your personal information, we will take all steps that are reasonable in the circumstances, having regard to the purpose for which your information is held, to correct your personal information.

If your request for correction of credit information is accepted we will provide written notice of this correction to any entity to which we have disclosed this information previously, to the extent that this is practicable.

6. Complaints

6.1. Complaints Handling Process

If you believe that we have breached a term of this Policy or the

Privacy Act you may submit a written complaint. The written complaint can be emailed or posted to us using the contact details set out below. You must include contact details for us to contact you regarding your complaint.

Our Privacy Officer will consider your complaint and respond as soon as reasonably possible, but not more than 30 days from receiving the complaint.

If you are unsatisfied with the outcome of your complaint you may refer your complaint to the Office of the Australian Information Commissioner to be resolved.

7. Contact Us

If you wish to:

- gain access to your personal information;
- make a complaint about a breach of your privacy;
- contact us with a query about how your information is collected or used;
- contact us regarding any other matter concerning this Policy,

you can speak directly with our staff who will do their best to try to resolve your issue as simply as possible. Alternatively, you can write to us or send us an email so that our Privacy Officer can consider the matter. We will respond to you as soon as reasonably possible.

If you do not wish to receive direct marketing from us, please contact our Privacy Officer via the details below. Our contact details are as follows:

Phone: 03 9097 2800

Privacy Officer contact: contact@sargon.com.au

Postal address: L9, 287 Collins St, Melbourne Vic 3000

For more information on privacy see the Office of the Australian Information Commissioner's website at: <http://www.oaic.gov.au>.