



# iInvest Securities

Stockbroking & Wealth Management

## PRIVACY POLICY

This is the Privacy Policy of iInvest Securities Pty Ltd. In this Privacy Policy 'iInvest Securities', 'we', 'our' and 'us' mean iInvest Securities Pty Ltd. If you want more information about this Privacy Policy, or if you want to inquire about any of your personal information, or if you believe your personal information is inaccurate, incomplete or out-of-date, contact us immediately.

If you give us personal information about another person, you represent that you are authorised to do so and agree to inform that person who we are, that we will use and disclose that information for the relevant purposes set out below, and that they can access the information we hold about them.

Your personal information will be treated strictly in accordance with the Australian Privacy Principles in the *Privacy Act 1988* (Cth) and the *Privacy Amendment (Enhancing Privacy Protection) Act 2012*.

## PERSONAL INFORMATION

Whilst the Australian Privacy Principles came into effect on 12 March 2014, some of the principles apply to information collected both prior to, and after, that date. Consequently, for personal information held prior to that date, in accordance with those particular principles, we will:

- Take reasonable steps to protect it from misuse, loss or unauthorised access or disclosure;
- Take reasonable steps to ensure that such information, if used, is accurate, complete and up to date;
- Provide you with access to the information if we still use it;
- Not use any government identifier to identify you, and
- Only transfer such information overseas with your consent or as authorised by the principles.

The remainder of this document is concerned with personal information collected on or after 12 March 2014, except insofar as this Privacy Policy further addresses the particular principles reflected in the five matters above.

## THE INFORMATION WE COLLECT

We collect personal information that we believe is necessary to deliver our services or products or otherwise for our primary business functions and/or activities.

Ordinarily we only collect information about you when you provide it to us or it is provided to us with your authority.

We collect personal information by lawful and fair means and not in an unreasonably intrusive way. The types of personal information we collect generally include your name, address, telephone number, email address, financial information, other contact or identification details and, in some cases, information necessary to make or receive payments to or from you or necessary to effect transactions in financial products on your behalf.

We will collect personal information directly from you when you apply for a product or a service, deal with us over the telephone or in person, send us a letter or email, or visit our website. On occasions, we may collect personal information about you from third parties, for example, share registries, ASIC and identification service providers.

If you fail to provide the personal information we reasonably request, we may not be permitted under the law to provide services to you, you may not receive payments owing to you as efficiently as possible, or we may not be able to communicate with you.

Apart from the necessity to collect your information in order to provide a service to you or maintain our relationship with you, the purposes for which we would generally collect and use your personal information will include:

- complying with legislative and regulatory requirements;
- performing our administrative operations, including accounting, risk management, record keeping, archiving, systems development and testing and staff training;
- conducting market or customer satisfaction research;
- inviting you to other events that may interest you;
- developing and identifying products and services that may interest you; and
- telling you about other products and services we offer (unless you ask us not to).

## **PERSONAL INFORMATION ABOUT THIRD PARTIES**

If at any time you supply us with personal information about another person, you should ensure that you are authorised to do so and you must agree to inform that person who we are, that we will use and disclose that personal information, and that they may gain access to it should we hold that information.

## **DISCLOSURE OF PERSONAL INFORMATION**

You authorise us to disclose necessary information to related companies, affiliates and any agents or contractors who provide services to us in connection with the provision of products or services you have sought from us. These parties are prohibited from using your personal information except for the specific purpose for which we supply it to them.

Subject to what is permitted by law, the types of third parties we may disclose your personal information to include:

- our agents, contractors, insurers and external advisers we engage from time to time to carry out, or advise on, our functions and activities;
- any person or organisation who introduces you to us;
- Our nominated ASX Trading Participant, D2MX (who conducts execution of ASX listed products on our behalf);
- Our nominated ASX Clearing and Settlement Participant Pershing Securities Australia Pty Ltd (who conducts clearing and settlement of ASX listed products on our behalf);
- regulatory bodies, government agencies, law enforcement bodies and courts;
- to ASX Limited (under the ASX Operating Rules) and the information may be used by ASX for its purposes (for example, in the course of ASX's compliance activities);
- other financial institutions; and
- any person to the extent necessary, in our view, in order to carry out the instructions you give to us.

In some cases, we may need to transfer your personal information outside Australia. For example, if you trade in securities listed on overseas exchanges, we may be required to provide your personal information to our overseas agents. If we believe that the overseas third party is not subject to, or has not agreed to comply with, privacy obligations equivalent to those which apply to us, we will seek your consent to transfer the information, except where the Australian Privacy Principles do not require us to do so.

## **PURPOSE AND USE OF PERSONAL INFORMATION**

We have collected and may use your information to do one or more of the following:

- open an account for you
- maintain your account
- process transactions on your behalf
- enable us to assess any request from you for financial advice
- send research information to you
- respond to any specific requests you may contact us about
- help us to assess products that may suit your financial needs
- notify you of any products that may be of interest to you
- keep you informed on matters that may affect or be related to your investments
- update your personal files
- enable us to meet our obligations under certain laws
- to assist you in determining your investment objectives and providing you with investment advice and information on new opportunities to assist you in achieving these objectives
- to provide you with regular reviews and keep you informed on the performance of your investments
- any purpose for which the information was requested and any directly related purpose
- developing, improving and marketing our products and services

## **OUR WEBSITE**

Our compliance with the Australian Privacy Principles also extends to when you transact business via our website. Our website terms and conditions and any privacy notices are clearly posted on all pages of the website.

When you use a link from our website to the websites of third parties, those websites are not subject to our Privacy Policy. Those third parties are responsible for informing you of their own privacy policies.

User names and passwords are required to access those areas of our website that are restricted to clients. You are reminded that these user names and passwords are strictly for your personal use only. You are responsible for all acts that result from any use of your user name and password, whether authorised or not, or that result from your failure to maintain security. You must notify us immediately if you consider that the security of your user name and password has been breached.

For statistical purposes we may collect information on website activity (such as the number of users who visit the website, their country, the date and time of visits, the number of pages viewed, navigation patterns and the operating systems and browsers used to access the site). This information on its own does not identify an individual but it does provide us with statistics that we can use to analyse and improve our website.

We also use cookies and measurement tools on our website, as do third parties such as analytics, who may monitor unidentifiable statistics relating to website access and usage. We use and disclose the unidentifiable information collected through the use of cookies and measurement tools in accordance with this Privacy Policy. This includes using the information to report statistics, analyse trends, diagnose problems and improve the quality of our products and services.

We may combine our cookies and information (collected through the cookies and measurement tools) on this website with other information (including information collected by third parties using their own cookies and measurement tools) to provide better or more relevant services and information.

If an individual does not want information collected through the use of cookies and/or measurement tools, they may be able to delete or reject cookies and/or some of the measurement software features through their browser or the settings section of their mobile or tablet device. Disabling these features may cause some of the functions on the websites to work less effectively.

We provide links to external websites, as well as to third party websites that allow interaction and sharing of content including social media buttons such as Facebook share, Twitter, Pinterest, Instagram and Google+. These linked sites, applications and widgets are not under our control and we do not accept responsibility for the conduct of companies linked to our websites, or their collection of information through these third party applications or widgets. Before disclosing information on any other website, or using these applications or widgets users are advised to examine the terms and conditions of using that website and the relevant third party's data collection practices and privacy policy.

The Internet is not always a secure method of transmitting information. While iInvest Securities take reasonable steps to ensure all information it receives is maintained securely, iInvest Securities cannot ensure that communications conducted via the Internet will be secure.

## **ACCESSING YOUR PERSONAL INFORMATION**

If at any time you wish to know what personal information we are holding about you, you are welcome to ask us for your details by writing to us in a form or manner which identifies the nature of the personal information requested. The appropriate contact is:

The Privacy Officer  
iInvest Securities Pty Ltd  
11 West Street  
BURLEIGH HEADS QLD 4220

Under certain circumstances we may not be able to tell you what personal information we hold about you. This includes where the information:

- relates to suspicions of unlawful activity, or misconduct of a serious nature and giving access would be likely to prejudice the taking of appropriate action in relation to the matter by iInvest Securities or an enforcement body;
  - would have an unreasonable impact on the privacy of another individual;
  - relates to existing or anticipated legal proceedings with you;
  - would reveal a commercially sensitive decision-making process or evaluative information;
- or
- prevents us by law from disclosing the information, or providing access which would prejudice certain investigations.

We may charge you a fee for accessing your personal information.

We will take reasonable steps to ensure that your personal information is accurate, complete and up to date.

If at any time, you find that current personal information we hold about you is inaccurate, incomplete or out of date, please contact us immediately and we will correct it, or advise you of any additional information we require to make the change.

## **SECURITY OF YOUR PERSONAL INFORMATION**

We will take reasonable steps to protect the personal information we hold from misuse and loss, and from unauthorised access, modification or disclosure. In line with our internal authorisation and access policies, employees only have access to information on a need to know basis.

We take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed.

However, no data transmission over the internet can be guaranteed as fully secure and we cannot guarantee or warrant the security of any information you send to us over the internet. You submit information over the internet at your own risk.

## **MARKETING**

We may use your personal details, including your address and/or email address, to provide you with newsletters and information about products, services or other events that may be of interest to you.

If at any time you do not wish to receive such marketing information, you have the option to ask us not to send you any further such material – you may do so by emailing, phoning or writing to us.

## **COMPLAINTS**

If you believe that the privacy of your personal information is not being adequately protected, you should contact our Privacy Officer. We will make every effort to resolve your complaint internally.

If we do not resolve your complaint to your satisfaction, you may apply to the Australian Information Commissioner to have your complaint investigated. For more information about how you may lodge a complaint with the Australian Information Commissioner, please contact the Commissioner's hotline service on 1300 363 992.

## **CHANGES TO THIS PRIVACY POLICY**

Please note that this Privacy Policy may change from time to time. You may at any time request a current copy from our Privacy Officer or access it from our website at [www.iinvestsecurities.com.au](http://www.iinvestsecurities.com.au). We encourage you to review our Privacy Policy periodically for any changes.

## **ADDITIONAL INFORMATION**

Additional information, including the Australian Privacy Principles, may be found on the Australian Information Commissioner's website at [www.oaic.gov.au](http://www.oaic.gov.au).

## **DECLINING TO PROVIDE YOUR PERSONAL INFORMATION**

If you do not give us your personal information, we may not be able to provide products and services as requested by you.

## **TELEPHONE RECORDING**

We may record telephone conversations between you and persons working for iInvest Securities. Such recordings or transcripts for such recordings may be used to resolve any dispute between you and iInvest Securities.

## **CONTACT DETAILS**

If you have any questions or would like further information regarding our Privacy Policy or our information handling practices, please contact us by:

E-mail: [info@iinvestsecurities.com.au](mailto:info@iinvestsecurities.com.au)

Telephone: (07) 5520 8788

By Mail:  
The Privacy Officer  
iInvest Securities Pty Ltd  
11 West Street  
BURLEIGH HEADS QLD 4220

Should you wish to obtain further information about privacy you can do so by visiting the Privacy Commissioner's website at [www.privacy.gov.au](http://www.privacy.gov.au)