

PRIVACY POLICY AND DISCLAIMER

PART A – PRIVACY STATEMENT

Venture Financial Planning Pty Ltd ('Venture') [ABN 62 095 194 559] operates as a public practice accounting firm as well as an authorised representative of Godfrey Pembroke Limited, trading as Venture Financial Advisers, an Australian Financial Services Licensee.

We understand that privacy is important to you and protecting your personal information is important to us. We are required to comply with the Australian Privacy Principles. We will always seek to comply with the Australian Privacy Principles as well as other applicable laws affecting your personal information.

This privacy policy outlines our policy on how we manage your personal information. It also sets out generally what sort of personal information we hold, for what purposes and how we collect, hold, use and disclose that information.

What does personal information mean?

Personal information is any information about you that identifies you or by which your identity can be reasonably determined.

Collecting your personal information – accounting services

Venture collects personal information from clients, customers, employees, contractors and other people. Venture collects and holds this information when it is necessary for business purposes. Your personal information is generally held in client files or on a computer database. Your personal information may also be held in a secure archiving facility.

Personal information which Venture collects includes but is not limited to name, address, job title, tax file numbers, financial institution details, phone numbers, email addresses and shareholding balances. In the course of providing tax, accounting, business services and related services to our clients, we may collect and hold more detailed personal information, for example financial information when we are engaged to perform services.

The information we collect is generally, but not necessarily, obtained directly from you when we first deal with you or from an application or other form completed by you, and from subsequent face to face meetings, email messages, telephone conversations and from third parties. On occasion an Issuer or security brokers may also provide this information. If you contact us we may keep a record of that contact.

If we are not able to collect all of this information, we may not be able to provide to you with a complete and accurate service.

Due to the nature of the services Venture provides it is generally impractical for Venture to deal with you anonymously.

Collecting your personal information – financial advice services

Your personal information will be collected and held by Venture Financial Advisers for the purposes of:

- providing you with the advisory services that you have requested;
- managing our relationship with you, including management and administration tasks such as answering your requests and concerns, conducting market research and taking any required legal action;
- completing documentation and forms, including identifying you or verifying your authority to act on behalf of a customer;
- to protect our business and other clients from fraudulent or unlawful activity;
- to comply with relevant laws, regulations, and other legal obligations;
- to help us improve the products and services offered to our clients, including contacting you about products and services in which you may be interested ; and
- for any purpose for which you have given your consent.

You can let us know at any time if you no longer wish to receive direct marketing offers by contacting us directly or unsubscribing via the link included in the footer of our emails. We will process your request as soon as practicable.

To enable your financial adviser to provide you with financial advice you request that is suitable for your investment objectives, financial situation and particular needs we need to obtain and hold personal information about you. This includes:

- your name, contact details and date of birth;
- employment details and history;
- financial details including information about your financial needs and objectives, your current financial circumstances including your assets and liabilities, income, expenditure, insurance cover and superannuation;
- details of your investment preferences and risk tolerance;
- family circumstances and social security eligibility; and
- any other information that we consider necessary.

The personal information collected may include sensitive information such as health information and memberships of professional or trade associations.

If it is reasonable and practicable we will only collect your personal information from you. Generally your personal information will be collected when you meet with your adviser in person, provide your adviser with information over the telephone or with written material. We may need to collect personal information from third parties, such as your accountant.

We may receive personal information about you when we have taken no active steps to collect that information. We destroy all unsolicited personal information, unless the personal information is relevant to our purposes for collecting personal information.

Your personal information is generally held in client files or a computer database. Your personal information may also be held in a secure archiving facility.

We take reasonable steps to ensure that the personal information that we hold is protected from misuse and loss and from unauthorised access, modification and disclosure. Some of the measures that we have adopted are having facilities for the secure storage of personal information, having secure offices and access controls for our computer systems.

We will also take reasonable steps to destroy or permanently de-identify personal information that we no longer need for any purpose for which it may be used or disclosed under the Australian Privacy Principles.

How we use your personal information – accounting services

Venture only uses your personal information for the purpose for which it was collected and to offer and provide related services that are connected to that initial purpose. This includes for example, providing Issuers with registry and registry related services, or notifying you about other Issuer or Venture services.

The purpose for which we collect, hold, use and disclose personal information are:

- to provide our service to you
- to respond to your requests
- to maintain contact with you
- to keep clients and other contacts informed of the services we offer and industry developments and seminars that may be of interest to you
- for general management and reporting purposes, such as invoicing and account management
- for recruiting purposes
- for purposes relating to the employment of our personnel and providing internal services to our employees
- for other purposes related to our business.

If you choose not to provide us your personal information we may be unable to perform such activities.

We may collect, hold or use information about individuals to market our services, including by email. You may opt out of marketing services at any time by writing to the Marketing Co-ordinator PO Box 928 Bendigo, 3552 or emailing us at venture@venturebendigo.com.au Please allow for 28 days for your request to be processed.

If we contact you via email, you may send a return email to notify us that you do not want to receive further marketing information from us via email.

How we use your personal information – financial advice services

Your personal information may be disclosed for purposes related to the provision of the financial advice you have requested. The types of service providers that may be provided with your personal information are:

- other financial advisers and organisations involved in providing the financial advice you have requested (which may include ongoing service) such as fund managers who assist us in providing financial advice and paraplanners;
- insurance providers, superannuation trustees and product issuers in connection with the provision to you of the financial advice you have requested;
- organisations that assist in operating a financial planning business such as those that provide administrative, financial, accounting, insurance, research, legal, computer or other business services;
- your representatives or service providers such as your accountant, solicitor, tax agent, stockbroker or bank;
- organisations involved in a business restructure or a transfer of all or part of the assets of our business or the due diligence procedures prior to any such sale or transfer;

- government authorities and other organisations when required by law; and
- organisations that you've consented to your personal information being disclosed to.

In addition to the purposes of collection set out above, your personal information may also be used in connection with such purposes.

We will seek to ensure that your personal information is not used or disclosed for any purpose other than:

- the primary purpose for which it was collected or a related secondary purpose;
- where you have consented to the use or disclosure; or
- in other circumstances where the Australian Privacy Principles authorise the use or disclosure such as when it is required by or authorised under law.

We may disclose your personal information to third parties who provide services to us, in which case we will seek to ensure that the personal information is held, used or disclosed consistently with the Australian Privacy Principles.

Organisations outside Australia

We may store your information in the cloud or other types of networked or electronic storage. As electronic or networked storage can be accessed from various countries via an internet connection, it's not always practicable to know in which country your information may be held. If your information is stored in this way, disclosures may occur in countries other than those listed. Overseas organisations may be required to disclose information we share with them under a foreign law. In those instances, we will not be responsible for that disclosure.

We will not send personal information to recipients outside of Australia unless:

- we have taken reasonable steps to ensure that the recipient does not breach the Privacy Act and the Australian Privacy Principles;
- the recipient is subject to an information privacy scheme similar to the Privacy Act; or
- the individual has consented to the disclosure.

Security of personal information

The policy of Venture is to only collect information in a way that is lawful, fair and is not unreasonably intrusive.

Venture will endeavour to take reasonable precautions to ensure the security of personal information held by it, whether electronically or in hard copy, from such risks as loss or unauthorised access, destruction, misuse, modification or disclosure. Your personal information is retained by us in the cloud or other types of networked or electronic storage or in hard copy files on-site. When your documents are no longer needed we either arrange for them to be shredded or we store them at reputable off-site security storage facilities.

Venture aims to achieve industry best practice in the security of personal information which it holds. It is our policy not to retain personal information once there is no longer a legal or business need for us to do so.

Data Security Breaches

When addressing any data security breaches, Venture will take into consideration the 'Data Breach Notification Guidelines' published by the Office of the Australian Information Commissioner.

Will we provide your personal information to anyone else?

We will provide information to AFS & Associates Pty Ltd access to your information to provide you with the product and service which you have requested as they are the lodging agent for the accounting services.

Venture does not routinely disclose personal information to other organisations unless:

- use or disclosure is permitted by this policy
- we believe it is necessary to provide you with a product or service which you have requested (or as an employee is necessary in maintaining your role at Venture)
- you give consent
- such disclosures are required by law, regulation, rule or professional standard. For example under the Chapter 2C of the Corporations Act, certain information about you as a security holder (including your name, address and details of securities you hold) must be included in the public register of the entity in which you hold securities and, this information will therefore be disclosed to anyone who requests to inspect it.

Venture uses service providers to help us maximise the quality and efficiency of our services and business operations, and personal information may sometimes be disclosed to those contractors or service providers. For example, personal information may be disclosed to IT service providers, off site security storage facilities, debt collection agencies, print or mail services. We require our service providers to adhere to our privacy guidelines and not to keep this information or use it for any unauthorised purposes.

We do not sell to or trade personal information with third parties.

What is a Government identifier?

A Government identifier is a Commonwealth Government or Commonwealth Government agency designated identification number such as your Tax File Number (TFN).

Although at times Venture may request or hold details regarding certain Government assigned identification numbers we do not use such information as identifiers of our own.

We only use Government identifiers for purposes required by law such as when we supply your TFN to the Australian Taxation Office.

Sensitive information

Some types of personal information is regarded as sensitive information if it concerns particular topics. Sensitive information can be information about your:

- racial or ethnic origin
- political opinions
- membership of a political association
- religious beliefs or affiliations
- philosophical beliefs
- membership of a professional or trade association
- membership of a trade union
- sexual preferences or practices
- criminal record
- health information

Venture only collects, uses or discloses this information about you as allowed by law.

Website

This policy also applies to any personal information we collect via our websites, including venturebendigo.com.au. Venture may also collect personal information from you via its websites.

Cookies may be used on some areas of our websites. A cookie is a small software application which allows a website to recognise a previous user and to observe how a user navigates within a website. Cookies are now used as a standard by many websites. Venture uses cookies to improve the navigational experience of visitors to our websites and to make them easier to use.

If you are concerned about cookies, most browsers now recognise when a cookie is offered and permit you to opt out of receiving it. If you are not sure whether your browser has this capability, you should check with the software manufacturer or your internet service provider. In most cases, you can refuse a cookie and still fully navigate the Venture website.

In order to properly manage our websites, we may log certain statistics about the users of the sites, for example the users' domains and browser types. None of this information specifically identifies an individual and it is used solely to ensure that our websites present the best possible navigational experience for visitors.

If you log onto the website and read or download information our Internet Service Provider/Hosting Provider, will record your server address, domain name, the date and time of your visit to our website, the pages viewed and the information downloaded. This information is used for measuring statistical site performance and website development purposes only.

When you scan a QR Code, the third party that we engage to provide our QR Codes may collect certain information from your mobile device (such as your mobile device identifier and IP address). This information is used only on our behalf for the purpose of providing anonymised statistical reports to us about users of our website and services.

You may wish to participate in social media platforms hosted by Venture which we make available to you. The main aim of these social media platforms is to facilitate and allow you to share content. However, Venture cannot be held responsible if you share personal information on social media platforms that is subsequently used, misused or otherwise appropriated by another user.

Venture may provide links to other social media platforms maintained on separate servers by individuals or organisations over which Venture has no control.

A link to a third party's website should not be construed as an endorsement by either Venture or that third party of the other or its products and services. Venture makes no representations or warranties regarding how user data is stored or used on third-party servers. We recommend reviewing the privacy policy of each third-party site linked from our site to determine their use of your personal data.

How we handle emails

We will preserve the contents of any email message that you send us if we believe that we have a legal requirement to do so. Emails sent to or from us are routinely monitored for quality control, systems administration and legal compliance purposes.

Access and correction of your personal information

Venture will take reasonable steps to keep any personal information up to date. Under the Privacy Act you can access information that we hold about you. There are some exceptions to this which are detailed in the Act.

When you make a request to access personal information, we will require you to provide some form of identification (such as a driver's licence) so we can verify that you are the person to whom the information relates. In some cases we may also request an administrative fee to cover the cost of access. If your personal information has been archived we may charge a fee for retrieval of your file.

You also have the right to ask us to correct information about you which is inaccurate, incomplete or out of date. In most cases, access to your personal information is available to you at no charge by contacting Venture on the following:

Phone: 03 5434 7600

In writing: The Managing Director, Venture Financial Planning Pty Ltd, PO Box 928, Bendigo, Victoria, 3552.

Email: m.camm@venturebendigo.com.au

If you are a security holder and your security holding is sponsored by a broker, you will need to contact your broker direct who will in turn arrange for the information to be collected.

All requests for access to personal information will be handled as quickly as possible and we will endeavour to process any request for access within 30 days of having received the request.

If you have any questions or comments about this privacy policy, or you wish to lodge a complaint about the way we have handled personal information about you, please contact Venture's Managing Director at the address listed above. Any complaint should be in writing. Venture will consider the complaint and endeavour to respond to it within 14 days.

If you still feel your issue hasn't been resolved to your satisfaction, then you can escalate your privacy concerns to:

Office of the Australian Information Commissioner

- www.oaic.gov.au/privacy
- Phone: 1300 363 992
- Email: enquiries@oaic.gov.au

Financial Ombudsman Service

- www.fos.org.au
- Phone: 1800 367 287
- Email: info@fos.org.au

We may change this policy from time to time to keep up with changes in the law, technology and practices.

This Privacy Policy was last updated in July 2018. All material copyright © 2018 Venture Financial Planning Pty Ltd.

PART B – DISCLAIMER

This website and the articles on our website are not a substitute for independent professional advice. We do not warrant the accuracy, completeness or adequacy of the information or material on this website. All information is subject to change without notice.

We and each party providing material displayed on this website disclaim liability to all persons or organisations in relation to any action(s) taken on the basis of currency or accuracy of the information or material, or any loss or damage suffered in connection with that information or material. You should make your own enquiries before entering into any transaction on the basis of the information or material on this website. Please ensure you contact us to discuss your particular circumstances and how the information provided applies to your situation.

Quality of information – always check the information

Before relying on the information on this website, users should carefully evaluate its accuracy, currency, completeness and relevance for their purposes, and should obtain professional advice relevant to their particular circumstances. We and associated parties cannot guarantee nor assume any legal liability or responsibility for the accuracy, currency or completeness of the information or material.

Links to external websites

This website may contain links to other websites which are external to our website. It is the responsibility of the user to make their own decisions about the accuracy, currency, reliability and correctness of information contained in linked external websites.

Linkage to external websites should not be taken to be an endorsement or a recommendation of any third party products or services offered by virtue of any information, material or content linked from or to this website. Users of links provided by this website are responsible for being aware of which organisation is represented or providing the information or material on the website they visit.

Views or recommendations provided in linked websites do not necessarily reflect our views or recommendations, nor the views or recommendations of associated parties.

Security of our website?

Users of our website should be aware that the World Wide Web is an insecure public network that gives rise to a potential risk that a user's transactions are being viewed, intercepted or modified by third parties or that files which the user downloads may contain computer viruses or other defects.

We and associated parties accept no liability for any interference with or damage to a user's computer system, software or data occurring in connection with this website. Users are encouraged to take appropriate and adequate precautions to ensure that whatever is selected from this website is free of viruses or other contamination that may interfere with or damage the user's computer system, software or data.

Notification

Notice of new or updated information or material available via our website may be emailed to our website members.