

## PRIVACY POLICY

Innova Investment Management Pty Ltd (ABN 39 626 539 455, AFS Licence 509578) and Innova Asset Management Pty Ltd (ABN 99 141 597 104, Authorised Representative 4022047) ("Innova") values the privacy of personal information and is committed to protecting your privacy in accordance with the Australian Privacy Principles ("APPs").

This Privacy Policy describes Innova's current policies and practices in relation to the collection, handling, use and disclosure of personal information. It also deals with how you can complain about a breach of the privacy laws and how you can access the personal information we hold and how to have that information corrected.

A copy of this Privacy Policy is available via our website [www.innovaam.com.au](http://www.innovaam.com.au), or you can contact us to request a copy. Further information on privacy in Australia may be obtained by visiting the website of the Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au).

### WHAT PERSONAL INFORMATION WILL BE COLLECTED?

We may be required to collect a range of personal information from you in the course of our business activities, including your name, address, contact details, financial institution account details and tax file number. We will only collect personal information necessary to provide our investment products and services to you.

We do not typically collect any sensitive information about you, however in the event that we consider it necessary to collect sensitive information, we will seek your prior consent. Although in certain circumstances we may be required to collect government identifiers such as your tax file number, we do not use or disclose this information other than when required, or authorised by law, or unless you have voluntarily consented to disclose this information to any third party.

### WHY IS PERSONAL INFORMATION COLLECTED?

The primary purpose of the collection of this information is so that we can provide our investment services to you. This may involve offering, arranging, managing or administering an investment product or service provided to you.

Personal information is also collected to comply with the variety of legislative obligations that will apply to us and to protect you and others against fraud and other illegal activities e.g. Corporations Act 2001 and Anti-Money Laundering and Counter-Terrorism Financing Act 2006.

We may also use this information to send you communications such as updates, offers and newsletters that are relevant to the services we provide. We may send you these communications by email if you have provided your email address. We always give you the option of electing not to receive these communications in the future, which you can

elect by notifying us (or unsubscribing). We will action this request within 10 working days and no longer send this information to you.

### HOW WILL THE INFORMATION BE COLLECTED?

We will generally collect your information directly from you or indirectly from a third party e.g. your adviser or other authorised representative with your consent.

### WHAT IF THE INFORMATION IS NOT PROVIDED?

We can only assist you if we have all relevant information in accordance with the legal and regulatory environment in which we operate. If not all information is provided, we may not be able to provide you with any services or products you are seeking. However, you can deal with us anonymously (or by a pseudonym) where it is lawful and practicable to do so e.g. if you request our contact or licence details or ask a general inquiry about our services.

### WHO WILL WE DISCLOSE THE INFORMATION TO?

We do not sell, trade, or rent your personal information to others.

In the course of providing our services to you, we may need to disclose your information to third parties in the following circumstances:

- to service providers who we utilise, including administration, custodial and trustee services (for our investment services) and other general business services such as information technology and compliance providers (including audit services);
- where disclosure of personal information is with your consent;
- in the event of a corporate sale, merger, re-structure or similar event; or
- as required by law to government, regulatory or enforcement bodies.

Disclosure of any sensitive information collected would only occur strictly for the purposes for which you gave it to us e.g. to assist with a complaint.

In all cases, we will take reasonable measures to ensure that any third party to whom we disclosed information will protect your information as required under the APPs.

### WILL YOU DISCLOSE MY INFORMATION OVERSEAS?

We will not disclose your information to any party outside Australia, however in line with modern business operations we and our service providers may use servers that are located outside of Australia for transmission and storage of data e.g. for email hosting, cloud-based data storage and back up, accounting and financial software providers, and these may be across multiple countries. Due diligence procedures are carried out before any new service provider is engaged to ensure

appropriate security measures are in place to protect personal information.

### HOW IS MY INFORMATION PROTECTED?

We will take all reasonable steps to protect the privacy and security of your information from unauthorised access, interference, modification and disclosure.

We hold the information we collect from you in electronic form only; any paper-based records are scanned and then securely destroyed via an onsite shredder. We maintain physical security over our paper and electronic data and premises by using monitored security systems, restricted building access and time locks. We also maintain computer and network security e.g. firewalls, user identifiers, permission levels and passwords to control access to computer systems where your information is stored.

Our electronic data is subject to rigorous back up procedures and stored securely off site. We may use external data storage providers however if we do, we take all reasonable precautions to ensure the information is protected in accordance with the APPs e.g. imposing strict contractual arrangements regarding the confidentiality, use, access and security of the information stored.

We keep personal information only for as long as is reasonably necessary for the purpose for which it was collected or to comply with any applicable legal or ethical reporting or document retention requirements. Should you cease to be a client of ours, we will maintain your personal information in a secure manner for 7 years and after this, the information will be permanently destroyed.

### HOW CAN I BE SURE MY INFORMATION IS CORRECT AND UP TO DATE?

We strive to maintain the reliability, accuracy, completeness and currency of the personal information we hold about you. We request that you update us as soon as possible for changes to your personal information that we hold. We strive to record information in a consistent format, promptly add updated or new personal information to existing records and where necessary, confirm the accuracy of information collected from a third party.

Should you wish to review your personal information, please provide a written request to our Privacy Officer (refer contact details below). Upon receipt of your request and subsequent verification of your identity, we will disclose to you the personal information we hold about you within 30 days. We will also correct, amend or delete any personal information that we agree is inaccurate, irrelevant, out of date or incomplete.

We do not charge for receiving a request for access to personal information or for complying with a correction request. However, if the information requested is not a straightforward issue and will involve a considerable amount of our time, then a charge will need to be confirmed for responding to the request for the information.

Some exceptions exist where we will not provide you with access to your personal information and if this should happen, we will provide you with a written explanation for that refusal.

### WHAT ABOUT INFORMATION COLLECTED ON THE WEBSITE?

Our website allows visitors to submit information via self service 'Contact Us' forms. Information collected via this form is sent to our offices via email (not encrypted) and is also stored on a database which is accessible by our external IT service providers. We take care to ensure that the personal information you give us on our website is protected e.g. utilising electronic security such as firewalls.

We may use technology to collect anonymous information about the use of our website e.g. when browsing our website, certain non-identifying information about the website usage is logged such as device and location details. We only use this information for statistical purposes, to improve our website and to better understand our visitors so we may improve our services.

Our website also uses cookies, which is information which allow us to identify your browser while you are using our site – they do not identify you. Cookies are small data files that contain information about your visit to our website. Our server records and stores this information ready for the next time that you visit our site. Most web browsers allow you to choose whether or not to accept cookies. If you do not wish to have cookies placed on your computer, please set your browser preferences to reject all cookies from our website.

Our website also provides links to third party websites which are not within our control, including the use of your information on those sites. Those websites may not be subject to the same privacy standards or requirements. You will need to contact or review those websites directly to ascertain their approach to privacy and your personal information.

### WHO SHOULD I CONTACT FOR ANY QUESTIONS OR COMPLAINTS?

We welcome your questions about privacy, please contact our Privacy Officer on the contact details listed below..

If you have any concerns or complaints, please contact us on the details listed below. We will acknowledge your complaint promptly and do our best to resolve it quickly and fairly. The Complaints Officer can be contacted via:

**Address:** PO Box Q165, Queen Victoria Building,  
Sydney, NSW 2000  
**Phone:** (02) 8203 9130  
**Email:** [dmiles@innovaam.com.au](mailto:dmiles@innovaam.com.au)  
**Website:** [www.innovaam.com.au](http://www.innovaam.com.au)

Should you require assistance in accessing our complaints handling process, or lodging a complaint, we will provide appropriate accessibility and assistance as needed as set out in our Complaints Guide which is available on our website.

We will respond with a decision within 30 days of you making the complaint and will provide you with information concerning referring your complaint to the Australian Financial Complaints Authority if we cannot resolve your complaint.

***By asking us to provide you with our investment services, you consent to the collection and use of the information you have provided to us for the purposes described in this Privacy Policy.***