

Centric



PRIVACY POLICY

ISSUER

Specialised Private Capital Ltd

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1. Purpose of This Privacy Policy

Specialised Private Capital Ltd (ABN 87 095 773 390, AFSL 246744) trading as Centric Capital (**Centric Capital, we, us, our**) is committed to protecting your privacy and the security of your personal information in accordance with the *Privacy Act 1988* (Cth) (**Privacy Act**), including the Australian Privacy Principles (**APPs**).

This Privacy Policy describes our policies and practices for collecting, handling, using and disclosing your personal information. It also explains how you may complain about a breach of the privacy laws and how we will deal with such complaints, how you can access the personal information we hold about you and how to have that information corrected.

2. Who We Are and What We Do

We are the issuer and operator of the Centric Platform Investor Directed Portfolio Service, and the Promoter, Sponsor and Investment Services Provider for Centric Super (collectively, **Centric**). Centric is an internet-based investments administration facility made available to:

- Persons who are interested in managing their investment portfolio, or holding their investments, through a centralised platform; and
- financial advisers who help such persons.

3. What is Personal Information?

Personal information includes any information or opinion about an identified individual or information from which an individual can be reasonably identified. The information or opinion will still be personal information whether it is true or not and regardless of whether we have kept a record of it. Personal information may include things such as your name, address, contact details, date of birth, government issued identifiers (such as your tax file number, Medicare number or driver's licence number), and bank account details.

4. Who Centric Capital Collects Personal Information About

When we provide Centric, we may collect personal information about:

- Persons who register through the Centric website;
- persons who apply for, or who are provided with, Centric (**Account Holders**);
- financial advisers, who may provide services to Account Holders;
- accountants and representatives, who are appointed by an Account Holder to have access to the Account Holder's Centric account;
- service providers or suppliers; and
- other third parties with whom we come into contact.

If we receive unsolicited personal information about you, if possible, we will return the unsolicited personal information to the person who provided it. In all other cases, we will destroy the information, unless we determine that the personal information is reasonably necessary for our functions or activities.

5. What Kind of Personal Information Does Centric Capital Collect and Hold?

When Centric Capital collects your information.

We collect personal information about you when:

- You register to gain access to our website;
- you apply for Centric;
- you use our products or services, including when you provide instructions to us through Centric or apply for an investment available on the Centric Investment Menu;
- you contact us;
- you visit our website; or
- you deal with us in some other way.

What information we collect

The information that we collect about you may include:

- Identification information, such as your name, address, contact details and date of birth;



- tax related information, such as your tax file number and information about your tax residency status;
- identifiers assigned by the Government, such as a tax file number, Medicare number or provider number;
- financial and transaction information; and
- information about your interactions with us, including information about any queries or complaints you make.

Sensitive information

The collection of sensitive information is restricted by the Privacy Act. This includes information about religion, racial or ethnic origin, political opinions, criminal record, and sexual orientation. It also includes health information and biometric information.

Generally, we only collect this sort of information if it is necessary to provide a specific product or service and you have consented to that collection. For example, we may collect voice biometric information to verify your identity or authorise transactions.

6. What If You Choose Not to Provide Information to Us?

We may be unable to provide our products or services to you where we do not have all the relevant information we require to deliver such products or services.

Anonymity and pseudonymity

Where practical, you may be able to deal with us anonymously or using a pseudonym. The majority of our services, however, will require collection of your personal information to allow us to provide you with the appropriate products, services or response.

7. For What Purposes Does Centric Capital Collect, Hold, Use and Disclose Your Personal Information?

The main reason we collect, use, hold and disclose your personal information is to facilitate the provision of Centric to you. This includes:

- Checking whether you are eligible for Centric or an investment available on the Centric Investment Menu;
- providing assistance to you where an application is not completed or to clarify any information included in an application completed by you;
- processing your application;
- verifying your identity;
- providing Centric to you, and giving you information about investments available on the Centric Investment Menu and other products and services;
- helping to manage Centric and administering the services we provide you, including answering your requests and complaints, varying products and services and taking any action required by law;
- telling you about other products or services that may be of interest to you (see Section 15 for further details); and
- allowing us to run our business and perform administrative and operational tasks, such as training staff, developing and marketing products and services, risk management, systems development and testing (including of the Centric website), and undertaking planning, research and statistical analysis.

We may also use information to comply with legislative or regulatory requirements in any jurisdiction, prevent fraud, crime or other activity that may cause harm (including any suspected fraud, crime or harmful activity) in relation to Centric, or any other products or services we provide.

8. How Does Centric Capital Collect Personal Information?

We collect personal information directly from you. We may collect your personal information using electronic means (see section 16 for more information).

We also collect personal information about you from others, such as from our related parties or from third party organisations.

This may happen without your direct involvement. For instance, we may collect personal information about you from:

- Publicly available sources of information;
- your representatives (including your legal adviser, executor, administrator, guardian,

trustee, attorney, accountant, financial adviser or other representatives);

- your employer;
- our service providers or other organisations that are involved in providing Centric to you, including any administrator and sub-custodian we have appointed; and
- commercial information service providers, bureaus or other persons that help us verify your identity or help us identify, investigate or prevent fraud or other misconduct.

9. What Laws Require or Authorise Centric Capital to Collect Personal Information

Centric Capital is required or authorised to collect:

- Certain identification information about you under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth); and
- your tax file number, if you choose to provide it, by the *Income Tax Assessment Act 1936* (Cth).

10. How Does Centric Capital Hold and Secure Personal Information?

Centric Capital strives to maintain the relevance, reliability, accuracy, completeness and currency of the personal information we hold, and to protect its privacy and security. Much of the information Centric Capital holds about you will be stored electronically in secure data centres, which are located in Australia, and owned by either Centric Capital or an external service provider. This does not include third parties backing up or mirroring their data in overseas jurisdictions. Those external service providers may back up or mirror their data in overseas jurisdictions. Some of your personal information may be stored in paper files.

We use a range of physical and electronic security measures to protect the security of the personal information held. For example:

- Access to information systems is controlled through identity and access management;
- all staff are bound by internal information security policies and are required to keep information secure;

- all staff are required to complete training about information security; and
- regular monitoring and review of compliance with internal policies and industry best practice.

11. Who Does Centric Capital Disclose Personal Information to, and Why?

Centric Capital may disclose your personal information to external organisations, including our service providers. We require these organisations to appropriately safeguard the privacy of the information provided to them. Our contracts with external organisations require compliance with the Privacy Act and that they only use the personal information we disclose for the specific role we ask them to perform.

These may include:

- Our agents, contractors and external service providers (including the administrator of Centric, sub-custodian, mailing houses and information technology service providers);
- payment systems operators (for example, merchants receiving card payments);
- our service providers or other organisations that are involved in providing Centric to you;
- financial services organisations, including banks, stockbrokers, custodians, fund managers and portfolio service providers;
- debt collectors;
- our legal advisers or auditors;
- your representatives (including your legal adviser, accountant, executor, administrator, guardian, trustee, attorney, accountant, financial adviser or other representatives);
- commercial information service providers, bureaus or other persons that help us verify your identity or help us identify, investigate or prevent fraud or other misconduct;
- external dispute resolution schemes;
- regulatory bodies, government agencies and law enforcement bodies in any jurisdiction; and
- other persons or companies in the event of a corporate sale, merger, reorganisation, dissolution or similar or related event.

We may also disclose your personal information to others where:

- We are required or authorised by law or where they have a public duty to do so;
- you have expressly consented to the disclosure or the consent may be reasonably inferred from the circumstances; or
- we are otherwise permitted to disclose the information under the Privacy Act.

12. Does Centric Platform Hold Credit Card or Other Payment Details?

We do not collect your credit card details, however, we may collect your financial and/or transactional information (such as your bank account details) in order to facilitate transactions as well as other necessary Centric functions.

Your financial and transactional information will be subject to a variety of physical and electronic security measures as outlined in section 10 of this policy.

13. Does Centric Capital Disclose Personal Information Overseas?

We may disclose your personal information to a recipient which is located outside Australia. This includes:

- Any financial institution with which you hold an account overseas, where you have given us permission to make enquiries on your behalf;
- other service providers or organisations that are involved in providing Centric to you that are located outside Australia (including New Zealand); and
- to comply with laws and assist government or law enforcement agencies.

Some encrypted data may be backed up or mirrored in overseas jurisdictions by service providers or third parties (including in New Zealand).

Any overseas disclosure does not affect our commitment to safeguarding your personal information and we will take reasonable steps to ensure any overseas recipient of your personal information complies with Australian privacy law.

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

- We have taken reasonable steps to ensure that the recipient does not breach the Privacy Act, including the APPs;
- the recipient is subject to an information privacy scheme similar to the Privacy Act; or
- you have consented to the disclosure.

14. European Union General Data Protection Regulation (GDPR)

If you:

- Register through the Centric website; and/or
- are a Centric account holder;

and you reside in a country that is a member of the European Economic Area, in addition to the protection you receive under the Privacy Act, you are entitled to other protections provided by the GDPR. These include in certain circumstances, the right to:

- Have your personal information erased;
- access your personal information in an electronic and portable format; and
- restrict or object to the processing of your personal information.

15. Does Centric Capital Use or Disclose Personal Information for Marketing?

We will use personal information to offer you products and services we believe may interest you. We may offer you products and services by various means, including mail, telephone, email, SMS or other electronic means, such as through social media or targeted advertising through our website.

We may also disclose your personal information to external companies who assist us to market our products and services to you, such as a mailing house.

If you do not wish to receive marketing offers from us, you must expressly ask us to stop sending those marketing offers to you, at which point, we will cease providing you with said offers.

16. Does Centric Capital Collect Personal Information Electronically?

Centric Capital will collect information from you electronically, for instance through Centric, the Centric website, internet browsing, mobile or tablet applications.

Each time you visit any of our websites, we collect information about your use of the website, which may include the following:

- The date and time of visits;
- which pages are viewed;
- how you navigate through the site and interact with pages (including fields completed in forms and applications completed);
- location information;
- information about the device used to visit the site; and
- IP addresses.

We use technology called cookies whenever you visit the Centric website. Cookies are small pieces of information that are stored in memory on your computer.

Cookies are used to identify your visit to the site, allowing us to identify you the next time you visit and to provide you with a more meaningful experience. One of the reasons for using cookies is to offer you increased security. By using the Centric website, you are agreeing to allow us to do these things.

The cookies we send to your computer cannot read your computer's hard drive, obtain any information from your browser or command your computer to perform any action. Cookies are designed so that they cannot be sent to another site or be retrieved by any other website.

We won't ask you to supply personal information publicly over any social media platform that we may use. However, we may ask you to send your details to us via private messaging, for example, to assist us answering a question. You may also be invited to share your personal information through secure channels to participate in other activities, such as competitions.

17. When We Destroy or Deidentify Information

Centric Capital aims to keep personal information only for as long as we need it (for example, for business or legal reasons). When we no longer need the information, we take reasonable steps to destroy or permanently de-identify it in accordance with relevant laws and our internal records.

18. Access to and Correction of Personal Information

You have a right to seek access to information which we hold about you, although there are some exceptions to this right. You also have the right to ask us to correct information we hold about you which is inaccurate, incomplete or out of date. To do so, you must contact us at the details listed in section 21.

Should you make a request to access the personal information which we hold about you, we may charge you for any reasonable costs we incur in meeting your request. We do not charge simply for receiving your request, or for complying with your instruction to correct that information.

For example, a reasonable cost may be charged if you have requested access more than once within twelve months. This charge covers such things as locating the information and supplying it to you.

There are some circumstances in which we are not required to give you access to your personal information. For example, you cannot access information where it would have an unreasonable impact on the privacy of another person or if the information is relevant to legal obligations or legal proceedings.

If we refuse your request for access to, or to correct, your personal information, we will give you a notice explaining the reasons why, except where it would be unreasonable to do so. If we refuse your request to correct your personal information, you have the right to request that a statement be associated with your personal information noting that you disagree with its accuracy. If we refuse your request to access or correct your personal information, we will also provide you with information on how you can complain about the refusal.

19. Notification of Eligible Data Breaches

Due to the *Privacy Amendment (Notifiable Data Breaches) Act 2017*, we are legally required to notify you of any eligible data breaches. To comply with this legal requirement, we have implemented a Data Breach Response Plan in order to deal with actual or potential data breaches as well as the notification process to be followed when notifying you.

Where an eligible data breach pertains to Centric, we may also provide notification to our service providers, or other organisations, that assist in providing Centric Super to you. This includes, but is not limited to, the Centric Super Trustee and the Administrator.

20. Resolving Your Privacy Concerns and Complaints

If you are concerned about how your personal information is being handled, or if you have a complaint about a breach by us of the APPs, you must contact us.

We will use reasonable endeavours to ensure that complaints are acknowledged within 3 days of receipt, are considered and the outcome and remedy, if any, communicated to you within 45 days after receipt of the complaint.

If you are not satisfied with the handling of your complaint, you may be able to contact the Australian Financial Complaints Authority (AFCA). AFCA can be contacted at:

Australian Financial Complaints Authority

 GPO Box 3, Melbourne VIC 3001
 1800 931 678
 www.afca.org.au

Under the Privacy Act, an individual may complain to the Office of the Australian Information Commissioner (OAIC) about the way we have handled their personal information. The OAIC can be contacted at:

Office of the Australian Information Commissioner

 GPO Box 5218, Sydney NSW 2001
 1300 363 992
 enquiries@oaic.gov.au
 www.oaic.gov.au

21. How You Can Contact Us

 1300 223 687
 support@centricwealth.com.au
 centricwealth.com.au
 PO Box 446 Flinders Lane VIC 8009

Our Privacy Officer can also be contacted in relation to privacy concerns.

 PO Box 446 Flinders Lane
Melbourne VIC 8009
 compliance@centricwealth.com.au

22. Changes to This Privacy Policy

We may change the way we handle personal information from time to time. If changes are made, we will update this Privacy Policy, which will be updated on the website accordingly.