

# BELL GROUP PRIVACY POLICY.

This is the Privacy Policy of the Bell Group. The Bell Group comprises numerous entities, including Bell Potter Securities Limited (AFSL 243 480 ABN 25 006 390 772), Bell Potter Capital Limited (ABN 54 085 797 735), Bell Potter Nominees Limited (AFSL 269278 ACN 088899601), BPC Securities Pty Ltd (AFSL 297851 ACN 072910966) and their related bodies corporate. In this Privacy Policy, “the Bell Group”, “we”, “our” and “us” mean any or all members of the Bell Group as the context requires. We abide by the National Privacy Legislation.

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about any of your personal information, or if you believe your personal information is inaccurate, incomplete or out-of-date, contact us.

In this Privacy Policy, all references to “contact us” are invitations to contact our Privacy Officer – contact details appear at the end of this Privacy Policy.

You can obtain more information about privacy from the Privacy Commissioner’s website at <http://www.privacy.gov.au>

## **NOT PROVIDING YOUR PERSONAL INFORMATION**

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

## **COLLECTING YOUR PERSONAL INFORMATION**

Personal information is information that can identify you.

We must obtain personal information about you so we can provide products and services to you, provide information and marketing material to you and satisfy certain legislative and regulatory requirements.

The main ways we may collect personal information about you are:

1. if you subscribe to our information service;
2. if you register with our registration service;
3. if you give information or other material to any member of the Bell Group; or

4. if the information is provided to us by a third party.

If you subscribe to our information service or register with our registration service and at any time decide that you do not wish to receive any further information from us, contact us in writing requesting to be removed from our subscription or registration database. If your details are incorrect, contact us in writing with your amended or updated details. You should then allow two (2) weeks for requests for removal, amendment or updating to be actioned.

We will not collect any personal information about you unless:

- you have knowingly given that information to the Bell Group or a director, officer, employee, servant, agent or contractor of the Bell Group;
- you have authorised a third party to give that information to the Bell Group or a director, officer, employee, servant, agent or contractor of the Bell Group; or
- The Bell Group has made reference to Financial Services Protection Limited or any other credit agency as to your credit worthiness.

We do not collect sensitive information. Examples of sensitive information are information relating to racial or ethnic origin, political opinions, religious beliefs or memberships in trade or professional associations.

## **USING AND DISCLOSING YOUR PERSONAL INFORMATION**

We will only use or disclose personal information we collect as permitted by the National Privacy Legislation.

Personal information collected may be used to:

- assess your application to open an account, including your creditworthiness; effect purchases and sales of securities and other transactions on your behalf and provide related facilities and services (including but not limited to settlement, sponsorship and nominee services);
- give you the services you requested;
- take account of your investment objectives, financial situation

and particular needs in giving you any personal securities recommendations;

- ensure compliance with our terms and conditions of trade;
- ensure compliance with all applicable legal or regulatory requirements; and
- obtain details necessary for the execution and settlement of transactions.

Personal information collected may also be used to:

- give you news, updates and information about the activities of Bell Potter or another company in the Bell Group, and general promotional material or marketing material which Bell Potter or another company in the Bell Group believes may be useful to you;
- give you newsletters for which you have subscribed;
- give you information or services for which you have registered or which you have otherwise requested;
- monitor who is accessing the website or using services offered on the website; and
- profile the type of people accessing the website,

unless you object and notify us in writing.

We will only use or disclose personal information collected by us:

- for the purposes for which it was provided or secondary-related purposes in circumstances where you would reasonably expect such use or disclosure;
- where you have consented to use or disclosure;
- where the National Privacy Principles authorise use or disclosure;
- in circumstances relating to public health and safety;
- where required or authorised by ASIC’s ASX Market Integrity Rules, the ASX Operating Rules, the Chi-X Operating Rules, the ASX Settlement Rules, ASIC’s ASX 24 Market Integrity Rules, the ASX 24 Operating Rules, the ASX Clear Operating Rules, the Corporations Act or any other applicable rule or law;

- by disclosing the information internally and to related bodies corporate to determine future strategies and develop services and market those services;
- by disclosing the information to issuers of financial products marketed by us;
- by disclosing your tax file number (if supplied) to companies in which investments are made on your behalf;
- by disclosing the information to potential purchasers for the purpose of them conducting due diligence investigations of our business on conditions that all disclosures are made in confidence and that the information will not be used or disclosed by them. If a sale of our business is effected, we may transfer your personal information to the purchaser of the business, and you will be advised of any transfer;
- where we believe the use or disclosure is necessary to give you a service you have requested;
- where we believe the use or disclosure is necessary to assist a law enforcement agency or an agency responsible for government or public security in the performance of our functions;
- where we suspect that your use of the website is in breach of the terms and conditions of use of the website; or
- for any other purpose not otherwise encapsulated in this paragraph but referred to in either or both of the preceding two paragraphs.

Your personal information may be transferred to our authorised representatives or other businesses to ensure that you receive personal and tailored service. We may also disclose your personal information to external contractors for the purpose of providing Bell Group information to you.

We will use our best endeavours to ensure that each of our authorised representatives and the businesses that we deal with adhere to the National Privacy Legislation. If you have any concerns about this, contact us.

Specific requirements apply to the collection, use and disclosure of your personal information for credit reporting purposes.

## **PROTECTING YOUR PERSONAL INFORMATION**

We take reasonable steps to protect your personal information from misuse, loss, unauthorised access, modification and disclosure. However, none of the Bell Group or its directors, officers, employees or agents guarantees the security of your personal information.

## **ACCESSING YOUR PERSONAL INFORMATION**

You may request access to your personal information. Access to your personal information is not the same as access to a file that we maintain as part of our business processes, nor does it necessarily include all information that we may have collated in relation to you.

We will grant you access to your personal information within 14-44 days of receiving your written request subject to us receiving written evidence of your identity.

We will not grant you access to your personal information where:

- access would pose a serious threat to life or health of an individual;
- access would have an unreasonable impact on the privacy of others;
- the request for access is a frivolous request;
- access would be unlawful;
- access would reveal any confidential formulae or the detail of any in-house evaluative decision-making process;
- denying access is required or authorised by any applicable rule or law;
- the information relates to existing or anticipated legal proceedings between you and the Bell Group and that information would not be discoverable in those proceedings;
- access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations;
- access would be likely to prejudice certain operations by or on behalf of an enforcement body; or
- an enforcement body requests that access not be provided on the grounds of national security.

If we deny you access to your personal information, we will give you the reason for the denial.

We may charge you a reasonable fee for providing access to, or copies of, your personal information.

## **AMENDING YOUR PERSONAL INFORMATION**

If you believe your personal information is inaccurate, incomplete or out-of-date, contact us.

## **EXTERNAL WEBSITES**

Our website contains references or links to other websites. Those references or links may in turn refer or link to other references or links. None of the Bell Group, or its directors, officers, employees or agents are responsible for any privacy policies or practices of any of those external websites.

## **CHANGES TO PRIVACY POLICY**

We may change this Privacy Policy from time to time.

## **PRIVACY COMPLAINTS**

If you believe your personal information is not properly protected, or there has been a breach or potential breach of this Privacy Policy or the National Privacy Legislation, contact us and request that your complaint be directed to the Privacy Officer.

We intend to respond to complaints within 7 business days of receiving your written complaint, although it could take longer for us to respond in complex matters. We will use our best endeavours to resolve any complaint to your satisfaction. However, if you are unhappy with our response, you can contact the Privacy Commissioner.

## **CONTACT DETAILS**

Privacy Officer: Ryan Hill  
 Level 33, Grosvenor Place  
 225 George Street  
 Sydney NSW 2000  
 rhill@bellpotter.com.au  
 or info@bellpotter.com.au  
 Telephone: 02 9255 8159  
 Facsimile: 02 9255 7253