

## Privacy Policy

### Table of Contents

<a href="#">1.0 - INTRODUCTION</a>	<a href="#">2</a>
<a href="#">2.0 - OUR PRIVACY COMMITMENT</a>	<a href="#">2</a>
<a href="#">3.0 - COLLECTING ORGANISATION AND CONTACT DETAILS</a>	<a href="#">2</a>
<a href="#">4.0 - WHAT PERSONAL INFORMATION ABE COLLECTS OR HAS COLLECTED</a>	<a href="#">3</a>
<a href="#">5.0 - ACCESS TO INFORMATION</a>	<a href="#">3</a>
<a href="#">6.0 - PURPOSE AND USE OF PERSONAL INFORMATION</a>	<a href="#">4</a>
<a href="#">7.0 - DISCLOSING YOUR PERSONAL INFORMATION IN AUSTRALIA</a>	<a href="#">4</a>
<a href="#">8.0 - DISCLOSING YOUR PERSONAL INFORMATION OVERSEAS</a>	<a href="#">4</a>
<a href="#">9.0 - LEGAL REQUIREMENTS TO COLLECT CERTAIN PERSONAL INFORMATION</a>	<a href="#">5</a>
<a href="#">10.0 - CONSEQUENCE OF NOT PROVIDING PERSONAL INFORMATION</a>	<a href="#">5</a>
<a href="#">11.0 - WHERE WE COLLECT THE INFORMATION FROM</a>	<a href="#">6</a>
<a href="#">12.0 - COOKIES</a>	<a href="#">6</a>
<a href="#">13.0 - YOU MAY "OPT-OUT" OF RECEIVING DIRECT MARKETING MATERIAL</a>	<a href="#">7</a>
<a href="#">14.0 - EMAIL ADDRESS</a>	<a href="#">7</a>
<a href="#">15.0 - SECURITY AND RETENTION POLICIES</a>	<a href="#">7</a>
<a href="#">16.0 - COMPLAINTS</a>	<a href="#">8</a>
<a href="#">17.0 - CONSENT</a>	<a href="#">8</a>

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## 1.0 - Introduction

1.1 - The Australian Bond Exchange Pty Ltd ("ABE") Limited Privacy Policy takes into consideration, your rights regarding collection, use and storage of information.

1.2 - Use this section to familiarise yourself with our privacy policy.

1.3 - In this document:

- Australian Bond Exchange Pty Ltd will be referred to as "ABE" or "we" or "us" or "our";
- "Personal information" means information or an opinion about you where it is possible to ascertain your identity from that information or opinion.

## 2.0 - Our privacy commitment

2.1 - On 21 December 2001, new laws came into effect to protect the privacy of your personal information. This policy briefly outlines how we safeguard your privacy and how ABE collects, maintains, uses and discloses personal information about you as a client of ABE.

2.2 - Our privacy policy sets out our policies for the management of personal information. You could obtain a copy of this policy free of charge by contacting us. We will manage your personal information in accordance with the law and the Australian Privacy Principles (subject to any other overriding provisions of law) and as specified in our privacy policy.

2.3 - Our privacy policy may change from time to time. This policy is to be read subject to any overriding provisions of law or contract.

2.4 - We take our privacy obligations seriously. We have appointed a Privacy Officer to manage privacy requests, corrections and complaints, and our

Compliance & Risk Manager has the overall responsibility of ensuring that we comply with our privacy obligations.

## 3.0 - Collecting organisation and contact details

3.1 - The personal information provided by you may have been collected by ABE and/or its related entities. Any additional personal information provided by you in the future will also be collected by ABE and/or its related entities.

3.2 - ABE can be contacted at:

Attention: Privacy Officer  
Level 19  
1 O'Connell St  
Sydney NSW 2000

OR

P.O. Box R445  
Royal Exchange NSW 1225  
Telephone: (02) 8076 9342

Email: [privacy@bondexchange.com.au](mailto:privacy@bondexchange.com.au)

3.3 - We may also obtain personal and other information from some third parties such as accountants and other organisations who have referred you to us. When we obtain personal and other information from third parties whom we are referred to by you, we will assume and you will ensure that you have made that third party aware of your referral and the purposes involved in the collection, use and disclosure of the relevant, personal or other information.

## 4.0 - What personal information ABE collects or has collected

4.1 - We only collect personal information that is necessary for us to perform our functions. The personal information ABE has

## Australian Bond Exchange

collected from you as a client is necessary for one or more of our services or activities provided to you. The personal information ABE has collected or may collect in the future may include any or all of the following personal information (This is not an exhaustive list):

- your name
- address
- contact details
- date of birth
- your email address
- your tax file number
- details of your annual income, expenditure and employment
- details of your assets and liabilities
- details of any securities or investments you have given us
- details of your associated bank accounts
- details of specific transactions
- details of your investment objectives and risk profile
- details of health information relating to your insurance requirements
- personal information that may be relevant to the services we offer you
- any other information we require to satisfy our obligations under relevant legislation

4.2 - We may also collect personal information directly from you when you deal with us over the telephone. We may for purposes of security, quality, training or verification:

- listen to and/or record telephone calls to which you are a party with us;
- collect and store details of your IP address; and
- collect, store and analyse how you use our website and other electronic applications and programs.

4.3 - We will assume you consent to the collection of your personal information in the manner specified in this Privacy Policy until you tell us to the contrary by following the

instructions contained under the heading "Consent" below.

### 5.0 - Access to information

5.1 - You are entitled at any time to request access to personal information held by us about you and to ask us to correct this information where you believe (and in some circumstances, prove) it is incorrect or out of date. To do this please contact us using the contact details above and you will be advised of our procedures for accessing and correcting personal information.

5.2 - ABE will not charge you for lodging a request to access your personal information, but may charge you for ABE's reasonable costs of making the personal information available to you. In limited circumstances access may be denied where required or permitted by law. If we decide not to provide you with access to your personal information, we will give you our reasons for our decision.

### 6.0 - Purpose and use of personal information

6.1 - ABE has 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

## Australian Bond Exchange

- 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

### 7.0 - Disclosing your personal information in Australia

7.1 - ABE undertakes not to trade, rent or sell your personal information. ABE may disclose your personal information to the following organisations for the purposes specified:

- a) to related companies of ABE for the purpose of marketing new investment opportunities to you
- b) to the Australian Stock Exchange and its related entities, Chi-X Australia Pty Limited (Chi-X), Options clearing House, National Stock Exchange and its related entities, Nasdaq LLC and its related entities, Perpetual Limited and its related entities, Fund Managers, Insurers, Share Registries, and other product providers to establish accounts on your behalf or to process transactions
- c) to our bank, when depositing funds to your account
- d) to outsourcing organisations contracted by ABE to provide administrative functions on our behalf, for example IT contractors providing maintenance of our data systems
- e) government authorities required by law

### 8.0 - Disclosing your personal information overseas

8.1 - Some of our third-party contractors and service providers may perform certain services overseas, or your portfolio may include interests managed by our overseas custodians and agents. As a result, your personal information may be disclosed (on a confidential basis) to a recipient in a foreign country, including the USA, Canada, Singapore, and the United Kingdom; and there may be other jurisdictions that are specific to your portfolio.

8.2 - ABE may disclose your personal information to an organisation in a foreign country if:

- you consent to the disclosure;
- if the disclosure is required by law;
- the transfer is necessary for the performance of a contract between you and the foreign organisation, or for the implementation of pre-contractual measures taken in response to your request;
- or the transfer is necessary for the conclusion or performance of a contract, concluded in your interest, between the foreign organisation and a third party;

and

- ABE reasonably believes that the recipient of the information is subject to a law, binding scheme or contract which effectively upholds principles for fair handling of the information that are substantially similar to the Australian Privacy Principles;

or

- ABE has taken reasonable steps to ensure that the information which it has transferred will not be held, used or disclosed by the recipient of the information inconsistently with the Australian Privacy Principles.

8.3 - In addition ABE may disclose personal information it holds about you in the following circumstances:

- you consent to the disclosure
- if the disclosure is required by law

### 9.0 - Legal requirements to collect certain personal information

9.1 - Prior to providing products or services to you ABE is obliged by law to collect, and verify, certain personal information from you. The laws governing these requirements include:

- The Financial Transactions Reports Act (1988) (Cth)
- The Anti-Money Laundering and Counter Terrorism Financing Act (2006)(Cth)
- Australian taxation laws
- The Corporations law
- Financial services laws

### 10.0 - Consequence of not providing personal information

10.1 - You may choose not to give ABE your personal information. Depending on the type of product or service you request, one or all of the consequences set out below may apply if you do not give some or all of your personal information to us:

- ABE will not be able to provide you with the requested account or facility
- ABE will not be able to provide you with the requested investment product
- if you do not provide your tax file number, tax at the highest rate may be deducted from any dividends or interest paid to you on investments managed by ABE
- ABE will not be able to deposit funds to your bank account

### 11.0 - Where we collect the information from

11.1 - In most instances personal information about you will be collected directly from you in either an application form or documents completed by you, correspondence from you to us, during an interview or from telephone contact.

11.2 - We may also obtain personal and other information from some third parties such as accountants and any other organisation who have referred you to us. When we obtain personal and other information from third parties whom we are referred to by you, we will assume and you will ensure that you have made that third party aware of your referral and the purposes involved in the collection, use and disclosure of the relevant personal or other information.

11.3 - Personal information about you may also be collected from our website but only if you voluntarily provide us with your details (e.g. If you email your contact details to us or if you use a logon and password to access a particular service).

11.4 - When you visit our website our web server collects the following types of generic non-personal information for statistical purposes:

- your internet service providers address
- the number of users who visit the website
- the date and time of each visit
- the pages accessed and the documents downloaded
- the type of browser used
- the site that referred you to us
- the site that you went to after you finished visiting us

11.5 - When you browse our site, we also automatically receive your computer's internet protocol (IP) address in order to provide us with information that helps us learn about your browser and operating

system so we can better improve the experience for all our users.

11.6 - The ABE website contains links to the websites of third parties. If you access those third party web sites they may collect information about you. ABE does not collect information about you from the third parties. You will need to contact them to ascertain their privacy statements.

### 12.0 - Cookies

12.1 - A cookie is a small text file placed on your computer hard drive by a web page server. Our web server may access cookies later. Cookies store information about your use of our web site.

12.2 - ABE use cookies to:

- determine whether you have previously used the ABE web site
- identify the pages you have accessed;
- facilitate administration of the site and for security purposes.

12.3 - Cookies can either be "persistent" or "session" based. Persistent cookies are stored on your computer, contain an expiration date, and are mainly for the user's convenience. Session cookies are short lived and are held on your browser's memory only for the duration of your session, they are used only during a browsing session, and expire when you quit your browser.

12.4 - We may use both session and persistent cookies. This information may be used to personalise your current visit to our website. Upon closing your browser, the session cookie is destroyed.

12.5 - Most Internet browsers can be set to accept or reject cookies. If you do not want to accept cookies, you can adjust your Internet browser to reject cookies to or notify you when they are being used. However, rejecting cookies may limit the functionality of our website.

### 13.0 - You may "opt-out" of receiving direct marketing material

13.1 - From the information we obtain from you we use some of it to keep you informed of other products, services or opportunities that may be of interest to you or help you achieve your investment objectives.

13.2 - If you do not want your personal information to be used for these purposes, please contact us using the contact details above.

13.3 - Please note that you can withdraw your consent, without any charge, by contacting us at any time.

13.4 - We will not disclose information about you to third parties for direct marketing purposes.

### 14.0 - Email address

14.1 - Unless otherwise specified in this Privacy Policy if you provide us with your email address during a visit to our website it will only be used for the purpose for which you provided it to us. It will not be added to a mailing list without your consent unless the mailing list is directly related to the purpose for which you provided your email address to us.

14.2 - We may use your email address, for example, to provide you with information about a particular service or product or to respond to a message you have sent us.

14.3 - If you subscribe to one of our services and provide your email address to us so we may communicate with you through email, we may also use your email address to advise you of upgrades and changes to those services.

## 15.0 - Security and retention policies

15.1 - ABE is committed to ensuring the security of personal information that we hold about you. We take reasonable steps to ensure the personal information we hold about you is stored securely, whether in a physical or electronic form. Some of the ways we do this are:

- confidentiality requirements of our employees, agents and authorised representatives;
- document storage security policies;
- security measures for access to our systems;
- only giving access to personal information to a person who is verified to be able to receive that information; and
- electronic security systems such as firewalls and data encryption on our websites.

15.2 - If you use the internet to communicate with us you should be aware that there are inherent risks in transmitting personal information over the internet. ABE does not have control over the transfer of personal information over the internet and we cannot guarantee its security.

15.3 - Any personal information we no longer require may be destroyed. An exception to this may be where records are required to be retained by law.

## 16.0 - Complaints

16.1 - If you have a complaint about our treatment of your privacy, please contact our Privacy Officer using the contact details above. Our Privacy Officer will investigate your complaint and endeavour to resolve any issue to your satisfaction.

## 17.0 - Consent

17.1 - If you do not consent to the use or disclosure of your personal information in the manner indicated above or in our Privacy Policy as amended from time to time, contact our Privacy Officer using the details provided above. Please note that you can withdraw your consent, without any charge, by contacting us at any time.