



EC.Pohl & Co

Privacy Statement

Owner	Compliance Manager, EC Pohl & Co
Approval	Managing Director, EC Pohl & Co
Relates to	EC Pohl & Co Pty Ltd ('ECP')
Date Last Updated	June 2020
Primary Rules/Rationale	Privacy Act 1988 (Cth) Privacy Amendment (Notifiable Data Breaches) Act 2017

TABLE OF CONTENTS

PRIVACY STATEMENT	1
WHAT INFORMATION WE COLLECT FROM YOU	1
PURPOSE OF COLLECTION	1
METHOD OF COLLECTION	3
FAILURE TO PROVIDE INFORMATION	3
USE AND DISCLOSURE OF INFORMATION	3
SECURITY OF YOUR INFORMATION	3
DATA BREACH NOTIFICATION	4
INTERNET USERS	4
ACCEPTANCE AND CHANGES TO PRIVACY STATEMENTS	4
ACCESS AND UPDATING OF INFORMATION	4
HOW YOU CAN CONTACT US	5

PRIVACY STATEMENT

EC Pohl & Co Pty Limited (referred to in this policy as EC Pohl & Co, we, us, our) understands and appreciates that you are concerned about the confidentiality and security of information that we may collect about you. EC Pohl & Co is committed to providing you with information on our services within a secure and confidential on-line environment. The Privacy Act 1988 (Cth) (Privacy Act) and the Australian Privacy Principles (APPs) govern the way in which we must manage your personal information and this policy sets out how we collect, use, disclose and otherwise manage personal information about you.

WHAT INFORMATION WE COLLECT FROM YOU

We may collect and hold personal information about you, that is, information that can identify you, and is relevant to providing you with the services you are seeking. Any personal information we collect will be used only in accordance with this Privacy Policy. In particular, we may collect:

- (a) Your name;
- (b) Your contact details (including your phone number, address and email address);
- (c) Financial information relating to your investments with us (including Investment Holdings, Tax file number and bank account details);
- (d) Authorised representative details (including Lawyer, Accountant or other representatives)
- (e) If you access or use our website (**Site**), the date and time of your visit, the pages viewed, and information downloaded.

PURPOSE OF COLLECTION

The personal information that we collect and hold about you, depends on your interaction with us. Generally, we will collect, use and hold your personal information if it is reasonably necessary for, or directly related to the performance of our functions and activities and for:

1. The purpose of enabling EC Pohl & Co to provide services or information to you or someone you know in accordance with your requests or reasonable expectations;
2. The purposes of enabling EC Pohl & Co to undertake research, planning, product development, risk assessment, risk modelling and marketing;
3. Providing you with information about other services that we, or our related entities and other organisations that we have affiliations with, offer that may be of interest to you;
4. Facilitating our internal business operations, including the fulfilment of any legal requirements;

any other purpose required by or to the extent permitted by law.

METHOD OF COLLECTION

EC Pohl & Co will generally collect information directly from you through the use of our standard forms, over the internet, via email, or through a telephone or face to face conversation with you. There will also be instances where personal information about you is collected indirectly because it is unreasonable or impractical to collect personal information directly from you. We may collect personal information about you from your broker, accountant, or other financial or legal adviser and the ATO, ASIC or other government agency.

We will usually notify you about collection of your personal information from third parties in advance, or where that is not possible, as soon as reasonably practicable after the information has been collected.

FAILURE TO PROVIDE INFORMATION

If the personal information you provide to us is incomplete or inaccurate, we may be unable to provide you, or someone else you know, with the services you, or they, are seeking.

USE AND DISCLOSURE OF INFORMATION

Generally, we only use or disclose personal information about you for the purposes for which it was collected (as set out above). We may disclose personal information about you to:

- (a) Service providers, who assist us in operating our business (such as Citigroup Pty Limited, IRESS Limited, and our auditors), and these service providers may not be required to comply with our privacy policy;
- (b) Our related entities and other organisations with whom we have affiliations, so that those organisations may provide you with information about services and various promotions.

You should note that information we collect from you may also be disclosed to third parties if that disclosure is required by or to the extent permitted by law.

SECURITY OF YOUR INFORMATION

EC Pohl & Co takes reasonable steps to preserve the security of personal information it collects via the Site. We cannot ensure or warrant the security of any information you transmit to us or receive from our online products or services and you do so at your own risk. Once we receive your transmission, we take reasonable steps to preserve the security of information on our own system and protect it from interference, misuse, loss, unauthorised access, modification or disclosure, including electronic and physical security measures.

Your account information is password and user ID protected and we recommend you do not divulge your password or user ID to anyone. Unfortunately, no data transmission over the internet can be guaranteed as totally secure. Accordingly, although EC Pohl & Co strives to protect such information, EC Pohl & Co cannot ensure or warrant the security of any information you transmit to us or receive from our online products or

services and you do so at your own risk. Once we receive your transmission, we take reasonable steps to preserve the security of information on our own system.

From time to time the Site may contain links to other websites, and EC Pohl & Co is not responsible for the privacy practices or the content of these websites and linked websites are not subject to our privacy policies and procedures.

DATA BREACH NOTIFICATION

The Privacy Amendment (Notifiable Data Breaches) Act 2017 requires us, in the event of a data breach, such as the unauthorised loss, use or disclosure of personal information, to assess and respond in line with our applicable policies and procedures. We have an obligation to report data breaches to the Office of the Australian Information Commissioner (OAIC) in certain circumstances. In the unlikely event that we have to notify the OAIC we will also notify the individuals affected.

INTERNET USERS

If you access our Site, we may collect additional personal information about you in the form of your IP address and domain name.

Our Site uses cookies. A cookie contains information about your visit to the Site. When you visit the Site again, our server will look for the cookie and structure itself based on the information provided. A cookie identifies your computer to our web server when you visit the Site. We do not use the cookie to store personal information about you. EC Pohl & Co uses browser cookies to improve the speed and reliability of our security system. It is recommended that you turn off any cookie warnings in your browser before using this Site, otherwise you may not be able to use the full functionality of this Site.

ACCEPTANCE AND CHANGES TO PRIVACY STATEMENTS

You acknowledge and accept that your use of the Site indicates your acceptance of this Privacy Policy. This Privacy Policy may change from time to time. Any information collected after an amended Privacy Policy has been posted on this Site will be subject to that amended Privacy Policy.

ACCESS AND UPDATING OF INFORMATION

You are able to access and update the personal information that we hold about you at any time, upon making a written request. We will respond to your request within a reasonable period. We may charge you a reasonable fee for processing your request (but not for making the request for access). We may decline a request for access to personal information in circumstances prescribed by the Privacy Act, and if we do, we will give you a written notice that sets out the reasons for the refusal (unless it would be unreasonable to provide those reasons).

If, upon receiving access to your personal information or at any other time, you believe the personal information we hold about you is inaccurate, incomplete or out of date, please notify us immediately. We will take reasonable steps to correct the information so that it is accurate, complete and up to date.

If we refuse to correct your personal information, we will give you a written notice that sets out our reasons for our refusal (unless it would be unreasonable to provide those reasons), including details of the mechanisms available to you to make a complaint.

To amend personal information that EC Pohl & Co holds you should contact our Client Services team on 07 5644 4400.

HOW YOU CAN CONTACT US

If you have any questions or feedback about this statement or any privacy issues concerning EC Pohl & Co, please contact the Privacy Officer, EC Pohl & Co Pty Ltd, PO Box 7536, Gold Coast MC QLD 9726 at any time in writing or send an e-mail to ecpohlprivacy@ecpohl.com

If you wish to make a complaint about a breach of the Privacy Act, the APPs or a privacy code that applies to us, please contact us using the details above and we will take reasonable steps to investigate the complaint and respond to you.

If after this process you are not satisfied with our response, you can submit a complaint to the Office of the Information Commissioner. To lodge a complaint, visit the 'Complaints' section of the Information Commissioner's website, located at <http://www.oaic.gov.au/privacy/privacy-complaints>, to obtain the relevant complaint forms, or contact the Information Commissioner's office.

For more information about privacy in general, you can visit the Office of the Information Commissioner's website at www.oaic.gov.au.
