

Privacy Policy Template

Effective Date: October 2024

Insight Investment Partners is committed to providing quality financial services to you and recognizes the importance of safeguarding your personal information. This Privacy Policy outlines our ongoing obligations to you concerning how we manage your Personal Information.

We have adopted the Australian Privacy Principles (APPs) contained in the **Privacy Act 1988 (Cth)** (the Privacy Act). The APPs govern how we collect, use, disclose, store, secure, and dispose of your Personal Information.

A copy of the Australian Privacy Principles may be obtained from the website of the Office of the Australian Information Commissioner at www.oaic.gov.au.

What is Personal Information and Why Do We Collect It?

Personal Information is information or an opinion that identifies an individual. The types of Personal Information we collect include, but are not limited to:

- Names
- Addresses
- Email addresses
- Phone numbers
- Financial information
- Investment details
- Tax File Numbers
- Any other information necessary to provide our services

We collect your Personal Information primarily to:

- Provide tailored financial services to you
- Comply with legal and regulatory obligations
- Improve our services

We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or

disclosure. You may unsubscribe from our mailing or marketing lists at any time by contacting us in writing.

How We Collect Personal Information

We collect Personal Information through various means, including:

- Face-to-face meetings
- Telephone calls
- Emails
- Our website
- Online forms
- From third-party service providers
- From publicly available sources

Where appropriate and possible, we will explain why we are collecting your information and how we plan to use it.

Sensitive Information

Sensitive Information is defined in the Privacy Act to include information or opinions about such things as an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record, or health information.

We will collect Sensitive Information only with your express consent unless required or authorized by law. Sensitive Information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent
- Where required or authorized by law

Third Parties

Where reasonable and practicable, we will collect your Personal Information only from you. However, in some circumstances, we may receive information from third parties. In such cases, we will take reasonable steps to ensure that you are aware of the information provided to us by the third party.

Disclosure of Personal Information

We may disclose your Personal Information to third parties, including but not limited to:

- Financial institutions and product issuers
- Regulatory bodies such as ASIC and AUSTRAC
- External auditors and compliance consultants
- Legal and accounting professionals
- IT and administrative service providers
- Third parties where you consent to the use or disclosure
- Where required or authorized by law

Use of Artificial Intelligence

We utilise Artificial Intelligence (AI) technologies to enhance our services and provide you with personalized financial advice. Our AI systems may process your Personal Information to:

- Analyse financial data and investment preferences
- Provide tailored product recommendations
- Improve the efficiency and accuracy of our services
- Provide compliance checks with the regulatory requirements.

Data Security and Privacy

We are committed to ensuring that all Personal Information processed by our AI systems is secure. We implement robust security measures to protect your data from unauthorized access, alteration, or disclosure.

Your Rights

You have the right to:

- Be informed about the use of your Personal Information in AI systems
- Access and correct your Personal Information
- Object to the processing of your Personal Information for automated decision-making

If you have any concerns about our use of AI technologies, please contact our Privacy Officer.

Sending Information Overseas For Administrative and Support Services

We may disclose Personal Information to overseas recipients located in the following countries for **administrative support purposes**:

- **India**
- **Philippines**

These overseas recipients provide administrative and support services that assist us in delivering our services to you efficiently.

We take reasonable steps to ensure that these overseas recipients comply with the APPs and the Privacy Act. By providing your Personal Information, you consent to this disclosure. Please note that if the overseas recipient breaches the APPs, we may not be accountable under the Privacy Act, and you may not be able to seek redress under the Act.

Security of Personal Information

We are committed to ensuring that your Personal Information is secure. We implement a range of security measures to protect your Personal Information from misuse, interference, loss, unauthorized access, modification, or disclosure. These measures include:

- Secure servers and encrypted data storage
- Firewalls and security software
- Restricted access to Personal Information
- Regular staff training on privacy obligations

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify it. However, we are required by law to retain certain information for a minimum of **seven (7) years** after our professional relationship ends.

Access to Your Personal Information

You have the right to access the Personal Information we hold about you and to update or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us in writing.

We will not charge any fee for your access request but may charge an administrative fee for providing a copy of your Personal Information.

To protect your Personal Information, we may require identification from you before releasing the requested information.

Maintaining the Quality of Your Personal Information

It is important to us that your Personal Information is accurate, complete, and up to date. If you find that the information we have is not current or is inaccurate, please advise us as soon as practicable so we can update our records and continue to provide quality services to you.

Website Links

Our website may contain links to other websites of interest. However, we do not have any control over those websites. Therefore, we are not responsible for the protection and privacy of any information you provide while visiting such sites, and such sites are not governed by this Privacy Policy. We recommend that you exercise caution and review the privacy policies applicable to the websites in question.

Policy Updates

This Privacy Policy may change from time to time and is available on our website. We will notify you of any significant changes by posting an updated version on our website and/or directly contacting you via email.

Privacy Policy Complaints and Enquiries

If you have any queries or complaints about our Privacy Policy or how we handle your Personal Information, please contact our **Privacy Officer**:

Privacy Officer

Insight Investment Partners

Address: Level 10, 60 York Street, SYDNEY NSW 2000

Email: info@iip.net.au

We will acknowledge your complaint within **five (5) business days** and aim to resolve it promptly. If you are not satisfied with our response, you may contact the Office of the Australian Information Commissioner.

Compliance with Other Laws

Our handling of Personal Information also complies with obligations under the **Corporations Act 2001 (Cth)** and regulations set by the **Australian Securities and Investments Commission (ASIC)**.