

1. Our Privacy Policies

A policy for the management of your personal information is set out in this document.

Halifax Investment Services Limited (Halifax) is bound by the National Privacy Principles contained in the *Privacy Act 1988* (Cth). The Privacy Act and general law place strict requirements on us to treat any personal information that we hold about you as confidential. This Privacy Policy details how we collect, use, disclose and protect that personal information.

This Privacy Policy does not cover personal information collected or held by us about our employees, and is to be read subject to any overriding provisions of law or contract. Personal Information is information or an opinion about you where it is possible to ascertain your identity from that information or opinion.

If you have any questions relating to this Privacy Policy or if you would like further information on the way we manage your personal information please contact our Privacy Officer please contact us by phone on 1300 363 505 or by email at privacy@halifax.com.au

2. Personal Information

We are permitted to collect personal information from you under laws relating to taxation, insurance, money laundering, credit and the provision of financial services. The personal information we collect from you will depend on what services we provide to you and may include any or all of the following:

- your name, address and contact details;
- your email address;
- your date of birth;
- your tax file number;
- details of your employment;
- details of your annual income and expenditure;
- details of your assets and liabilities;
- details of your investment objectives and risk profile;
- details of associated parties;
- details of associated bank accounts;
- details of any securities or investments you have given us;
- details of specific transactions; and
- details of health information relating to your insurance requirements.

3. Information Collection

Most personal information about you will be collected directly from you in either a Client Services Agreement or documents completed by you, correspondence from you to us, during an interview or from telephone contact. We may also obtain personal and other information from some third parties such as accountants and any other organization that has 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.

Personal information about you may also be collected from our website www.halifax.com.au 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). When you visit our web site 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 web site;
- 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; and
- the site that you went to after you finished visiting us.

No attempt is made to identify individual users from this information. The Halifax website contains links to the web sites of third parties. If you access those third party web sites they may collect information about you. Halifax does not collect information about you from the third parties. You will need to contact them to ascertain their privacy statements.

Sensitive information

Sensitive information encompasses information or an opinion about an individuals racial or ethnic origin, political opinions, membership of political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or

trade association, membership of a trade union, sexual preference or practices, criminal record or health information about an individual.

The Halifax website will not ask users to provide Halifax with sensitive information. If a user provides Halifax with sensitive information, Halifax will deal with such information in accordance with provisions of the Privacy Act.

Cookies

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. Halifax use **cookies** to:

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

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

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 object cookies to or notify you when they are being used. However, rejecting cookies may limit the functionality of our website.

Uses and disclosure of information

We will only use or disclose the personal information collected about you for the purposes for which it was collected (including one or more of those purposes specified in the Privacy Policy), for related purposes which you would reasonably expect us to use or disclose the personal information for, or where you have consented to us using or disclosing the personal information.

To the extent permitted by the *Spam Act 2003* (Cth) and the Privacy Act, we may use your contact details to send you information about us, including our products and services. When we send this information to you, we will include an unsubscribe feature which allows you to choose not to receive any more information of that kind from us.

We use your personal information for the following purposes:

- to open an account for you;
- to maintain account you have with us;
- to process your investment application and other transactions;
- to enable us to assess any request from you for financial advice;
- to enable us to send research information to you;
- to assist you in determining your investment objectives and providing you with investment advice
- to assist you in achieving these objectives;
- to respond to any specific requests you may make of us;
- to help us assess products that may suit your financial needs;
- to notify you of any products that may be of interest to you;
- to keep you informed on matters that may affect or be related to your investments;
- to advise you of new opportunities that may assist you in achieving your investment objectives;
- to provide you with regular reviews and keep you informed on the performance of your investments;
- to enable us to audit and monitor the services we provide to you;
- to update your personal files;
- to enable us to meet our obligations under law, for example the Australian Taxation Laws;
- any purposes for which the information was requested and any directly related purposes; and
- developing, improving and marketing our products and services.

If you do not provide us with your personal information, we will be unable to do one or more of the above. We will assume you consent to our management of your personal information in the manner specified in this Privacy Policy (which may change from time to time) and our Privacy Statement (which may change from time to time) until you tell us to the contrary by contacting us using the contact details above. We may disclose your personal information to the following organisations for the purposes specified:

- to related companies of Halifax for the purposes of marketing new investment opportunities to you;
- to the Australian Securities Exchange, Options clearing house, funds managers, insurers, share registries and other product providers to establish accounts on your behalf or to process transactions;
- to our bank, when depositing funds to your account;
- to outsourcing organisations contracted by Halifax to provide administrative functions and support services on our behalf, for example, IT contractors providing maintenance of our data systems; and
- where the disclosure is required by law, for example, to government agencies and regulatory bodies as part of our statutory obligations, or for law enforcement purposes.

You may 'opt-out' of receiving direct marketing material

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. Please contact us using the contact details above if you do not want your personal information to be used for these purposes. We will not disclose information about you to third parties for direct marketing purposes.

Email address

Unless otherwise specified in this Privacy Policy, if you provide us with your email address during a visit to our web site 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. 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.

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.

Security and Retention policies

Halifax 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. 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. Halifax does not have control over the transfer of personal information over the Internet and we cannot guarantee its security. 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.

Access and correction

Halifax tries to ensure all information about you that we collect, use or disclose is accurate, complete and up to date. You may at any time request access to personal information that we hold about you. If there is an error with the information or the information is incomplete, you can advise us and we will, where necessary, correct or add information. We will not charge you a fee for your access request but may charge you the reasonable cost of making the information available to you. If we decide not to correct or provide you with access to your personal information, we will give you our reasons for our decision.

If you would like access to the personal information we hold about you, please contact our privacy officer using the contact details provided above and you will be advised of our procedures for accessing and correcting personal information (which may vary depending upon the type of personal information).

Disputes

If you have a complaint about our treatment of your privacy, please contact our Privacy Officer using the contact details provided above. Our Privacy Officer will investigate your complaint and endeavour to resolve any issue to your satisfaction. If we do not adequately answer your concerns, you have the right to make a complaint to the Privacy Commissioner who can be contacted by telephone on 1300 363 992.

Updating our Privacy Policy

We may amend this Privacy Policy at any time and from time to time. If we do so, we will post the amended Privacy Policy on our website (mentioned above) so that you will always be aware of how we manage your personal information.