

# Privacy Policy

This policy governs the handling of all personal information in the possession of any Australian related body corporate or affiliate of OPIS Capital Limited ('OCL'). OCL is incorporated in Australia.

## **1. What Personal Information does the OCL Group collect**

OCL with whom you have a relationship will collect, use and store personal information that you provide or is gathered through your use of the OCL website. OCL may gather information on you from a third party. The third parties, from whom OCL may acquire information include but are not limited to, credit agencies, financial advisers, fund managers or intermediaries and spouses. Should a third party provide OCL with your personal information, we assume that you have provided your consent to that third party. If you have any problems or queries with OCL obtaining information on you from a third party, you should approach the relevant third party.

The personal information that you provide will be information which will enable OCL to identify you, your financial position and any other related information necessary or incidental to the financial products and services which OCL provide to you. If you do not provide any of the information we request, we may not be able to provide you with the services you require.

## **2. How will OCL use your personal information**

OCL is extremely conscious of the importance of adequately protecting your personal information. You may be assured that all reasonable measures will be taken by OCL to protect the confidentiality of your personal information. The purposes for which OCL will use your personal information will depend upon the relationship that you have with OCL. In most circumstances your personal information will be used to:

- Provide you with a financial or related service;
- Monitor the quality of the service that we provide to you;
- Improve, enhance and further our services
- Offer you further services, which may include using your information for marketing purposes; or
- Comply with regulatory or legal requirements. These laws and regulations include, but are not limited to, the Corporations Act 2001 (Cth), the Proceeds of Crime Act (1987), Financial Transaction Reports Act 1988 and relevant Stock Exchange Business Rules.

OCL will use best endeavours to obtain your consent should your personal information be used for any purpose other than those listed above. However, you should be aware the OCL will be entitled to use your personal information for any purposes which is related to the purposes above.

### **3. Storage of your Personal Information**

Your personal information will be stored in a secure environment in writing, electronically or both. You may obtain further details on the exact nature of where and how your information is stored by contacting our Privacy Officer whose details are provided in clause 4. With the exceptions detailed within this policy, your information will only be available to OCL employees on a need-to-know basis in order to perform their obligations and duties.

### **4. Access to you Personal Information**

Should you wish to know what personal information OCL holds on you, you may request to view this information by contacting our Privacy Officer:

**Sam Cole**

Ph: (03) 9602 3199

Email: [scole@opis.com.au](mailto:scole@opis.com.au)

The Privacy Officer will promptly investigate your privacy enquiry and provide you with appropriate answers where required. We may charge a reasonable fee for access to this information. Should you discover that any information is outdated, incorrect or incomplete you may request to have the personal information corrected and OCL will promptly update its records. You may also contact the Privacy Officer if you have any questions on our compliance with the Privacy Act 1988 (Cth) or if you wish to make a complaint about our handling of your personal information.

### **5. Disclosure of Personal Information**

You acknowledge and agree that your personal information may be disclosed to any of the following

- Any regulatory or legal body which governs the conduct of OCL. Whilst not exhaustive, OCL will need to disclose to regulatory bodies such as the Australian Securities & Investment Commission and relevant stock exchanges.
- Related bodies corporate of OCL whether in Australia or any overseas jurisdiction.
- A third party who is supplying a service to OCL. OCL may provide your personal information to third parties such as information technology maintenance companies, software providers and share registries. All reasonable steps will be taken by OCL to ensure the security of your personal information if disclosed to a third party.
- Any other third party provided that we obtain your prior written consent.

## **6. Disclosure of Information to Related Bodies Corporate**

You acknowledge and agree that if you supply your personal information to any member of the OCL team, this information may be transferred between related bodies corporate. The related bodies corporate to whom your personal information may be transferred, can be registered and governed by laws outside Australian jurisdiction. As such, the laws regulating a related body corporate may differ to Australian Laws and may apply greater or lesser standard of protection of your personal information.

OCL, however, are very conscious of the need to adequately protect clients' personal information. Should your personal information be transferred to a jurisdiction with inadequate privacy protection, internal OCL policy will impose the Australian privacy standard or superior in relation to the treatment and handling of your personal information.

## **7. OCL Websites**

Many OCL websites that you may have access to utilise "cookies". A cookie is an electronic mechanism which can trace your access and use information contained within our websites. Should you use any OCL website you consent to the use of cookies by OCL. Any personal information obtained through the use of cookies will be used to enhance the products and services that OCL provides you.

## **8. Sensitive Information**

In most cases a member of OCL will not collect sensitive personal information. Sensitive personal information is information about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practises, criminal record, or health information.

Where it is necessary for OCL to collect your sensitive information, if you provide OCL with this information then you have consented to this collection for the purposes of the Privacy Act 1988 (Cth).

## **9. Exemptions**

This policy does not apply in respect of acts and practise of OCL which are directly related to an employee record of a current or former employee.