

JOHNSTON GROCKE Privacy Policy

The privacy of your personal information is important to Dulwich Group Services Pty Ltd trading as Johnston Grocke ("Johnston Grocke").

Johnston Grocke is committed to treating the personal information we collect in accordance with the Australian Privacy Principles in the Privacy Act 1988 (Cth) (Privacy Act). This Privacy Policy sets out how we handle personal information.

This Privacy Policy does not apply to personal information collected by Johnston Grocke that is exempted under the Privacy Act, for example employee records.

This policy was last modified in February 2016. We may modify this Privacy Policy from time to time to reflect our current privacy practices.

Personal Information We Collect

This policy outlines how we manage your personal information. It also describes generally the type of information held and how that information is collected, used and disclosed.

What personal information will be collected?

In the course of our activities, we collect and hold personal information about you. Such personal information is collected for the purpose of providing the service(s) you have requested.

The nature of personal information we collect will depend on what service we are providing to you but will generally comprise, but not limited to, the following:

- name, address, contact details (phone, fax, email), date of birth
- educational qualifications, employment details and employment history
- information in identification documents (e.g. passport, driver's licence)
- tax file numbers and other government issued identification numbers
- bank account details, shareholdings and details of investments
- details of superannuation and insurance arrangements
- your Internet Protocol (IP) address
- payment details
- your financial needs and objectives
- financial details including your assets and liabilities (both actual and potential), income and expenditure
- your personal goals and objectives
- your investment preferences and aversion or tolerance to risk
- health information including current health, smoker status and historical medical records
- status of wills, beneficiaries and powers of attorney

How we collect and manage personal information

Generally we collect personal information from you directly. This may be when we deal with you in person or over the phone, when you send us correspondence, when you complete a survey, form or questionnaire, when you subscribe to a publication or when you use our website or social media.

Due to the nature of our services, this is generally not practical for us to deal with individuals on an anonymous basis or through the use of a pseudonym, although at times this may be possible (e.g. for client or staff feedback sought on an anonymous basis).

Personal information about someone else

Where you provide us with personal information in relation to someone else, you must have their consent or authority to do so. You must inform them of the details of this Privacy Policy.

Holding personal information

We store personal information in hard copy and electronic formats. We take security measures to protect your personal information including locks and alarms on our offices to protect physical information, as well as controls over our electronic information (e.g. restriction of access, firewalls, encryption, and passwords). We have document retention policies and procedures. In some cases, we engage third parties to host electronic data on our behalf.

Sensitive personal information

In certain circumstances we may request sensitive personal information such as health details. In doing so, we will request your consent to the proposed uses of that information. In the event that you provide us with unsolicited sensitive personal information, you consent to us using that information subject to applicable laws as described in this policy. We do not collect information about political or religious beliefs, ethnic background or sexual preferences.

The purpose for collecting, holding, using and disclosing personal information

We collect, hold and use personal information for the number of purposes including;

- to provide our services
- to respond to requests or queries
- to keep our clients and other contacts informed of our services and of industry developments and market trends
- to notify clients and other contacts of seminars, or other functions
- to verify clients' identity
- for general management, reporting and administrative purposes
- for processing payments
- for recruitment purposes
- for employment purposes
- to conduct surveys
- to meet any regulatory obligations
- as part of an actual (or proposed) acquisition, alliance, joint venture or referral arrangement
- to conduct internal analysis of our databases
- for any other business purpose

The types of third parties to whom we may disclose your personal information

- our service providers
- our professional advisers
- organisations with whom we have a business relationship that are bound by strict confidence
- government or regulatory agencies as part of an engagement or otherwise (e.g. the Australian Tax Office or Centrelink)
- as part of an actual (or proposed) acquisition, alliance, joint venture or referral arrangement

We do not disclose personal information to third parties for the purpose of allowing them to send marketing material to you.

We do not transfer personal information outside of Australia.

Direct Marketing

Johnston Grocke may use your personal information for the purposes of marketing our services. If you do not want to receive marketing material from us, you can contact our Privacy Officer as detailed in the 'Privacy Officer Contact Details' section.

Privacy on our website

Similar to other commercial Web sites, our Web site utilises a standard technology called cookies and web server log files to collect information about how our Web site is used. Information gathered through cookies and Web server logs may include the date and time of visits, the pages viewed, time spent at our Web site, and the Web sites visited just before and just after our Web site.

A cookie is a very small text document, which often includes an anonymous unique identifier. When you visit a Web site, that site's computer asks your computer for permission to store this file in a part of your hard drive specifically designated for cookies. Most browsers recognised when a cookie is offered and permit you to refuse or accept it.

In general you are not required to provide personal information when you visit our website. However, if you apply to receive information about our services, or wish to apply for a job, provision of certain personal information will be required.

We are not responsible for the practices employed by Web sites linked to or from our Web site or the information or content contained therein. Often links to other Web sites are provided solely as pointers to information on topics that may be useful to the users of our Web site. Please remember that when you use a link to go from our Website to another web site, our Privacy Policy is no longer in effect. Your browsing and interaction on any other web site, including web sites, which have a link on our Website, is subject to that Web site's own rules and policies. Please read over those rules and policies before proceeding.

Children's Privacy Protection

We understand the importance of protecting children's privacy in the online world. Our website is not designed for or intentionally targeted at children 13 years of age or younger. It is not our policy to intentionally collect or maintain information about anyone under the age of 13. It is our policy to never knowingly collect or maintain information about anyone under the age of 13, except as part of a specific engagement to provide professional services which necessitates such personal information be collected.

Gaining access to the personal information we hold

You may request in writing access to personal information held by us. This right of access is subject to exceptions allowed by law. The request must be made in writing to the Privacy Officer. Please see 'Privacy Officer Contact Details' for how to contact us. We reserve the right to charge a fee for searching for and providing access to personal information.

Accuracy of personal information

We are committed to ensuring that personal information is accurate, complete and up to date. Accordingly, please advise us in writing of any changes to the personal information you have provided. Furthermore, if you believe the personal information held by us is not accurate, complete

or up to date, please contact the Privacy Officer and we will take all reasonable steps to correct the information.

Complaints Resolution

We are committed to providing a fair and responsible system for the handling of complaints from parties whose personal information we hold. We will address any concerns you have through our complaints handling process. If you have any concerns regarding the way we have handled personal information, please contact the Privacy Officer in writing.

If you believe that Johnston Grocke has not adequately handled your privacy complaint, you may complain to the Office of the Australian Information Commissioner.

Office of the Australian Information Commissioner

GPO Box 5218

Sydney NSW 2001

1300 363 992

enquiries@oaic.gov.au

Privacy Officer Contact Details

Email at privacy@jgg.com.au or write to us at Level 1, 225 Greenhill Road, DULWICH SA 5065, or telephone on (08) 8303 0300.