



Privacy Policy – IDA Group Holdings Pty Ltd

Policy last updated: 16 December 2022

1 Purpose and nature

IDA Group Holdings Pty Ltd (ACN 613 629 306), IDA Securities Pty Ltd (ACN 155 991 585) and all of its related company and affiliates (**Company**) recognises the importance of your privacy. This Privacy Policy explains how the Company and its related entities, subsidiaries and employees intend to collect, store, use, disclose, protect and otherwise handle your personal information having regard to the Australian Privacy Principles (**APPs**) contained in the *Privacy Act 1988* (Cth) (**Privacy Act**).

This Privacy Policy does not constitute a contractual representation, promise, guarantee or warranty by the Company or any of its related entities, subsidiaries or employees to you as to the manner in which the Company or any of its related entities, subsidiaries or employees will or may collect, store, use, disclose, protect or otherwise handle your personal information. Some matters are beyond the control of the Company, such as third party malicious or criminal attacks.

The Company may allow its related entities, subsidiaries, and their employees, to use and process your personal information in the same way and to the same extent that the Company is permitted to under this Privacy Policy. These related entities comply with the same obligations that the Company has to protect your personal information under this Privacy Policy.

2 What is personal information?

Personal information is information or an opinion about you from which you can be reasonably identified.

3 Why does the Company collect personal information?

The Company collects personal information for the primary purpose of providing its products and services to you, which may include investment opportunities, financing options, and commercial, financial and strategic advice.

The Company may also collect your personal information in connection with providing, administering, improving and personalising its products and services, marketing and to support its business functions.

The Company may also collect your personal information to comply with any legal requirements, including:

- (a) the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth);
- (b) applicable taxation law;
- (c) the *Corporations Act 2001* (Cth);
- (d) the *Australian Securities and Investments Commission Act 2001* (Cth); and

- (e) the *Bankruptcy Act 1966* (Cth).

The Company may also collect and use personal information for secondary purposes closely related to this primary purpose. For example, where an individual is the director of, guarantor of, or related to, entities that are customers or parties to transactions, the Company may collect their personal information for the purpose of providing its services to the relevant customer that is associated with the individual. This may include collecting personal information for the purpose of accessing your personal credit report and other personal searches to assess the relevant customer's financial application.

The credit reporting system differentiates between consumer credit (such as home loans and personal loans for personal use) and commercial credit (such as loans for business purposes). When you apply for commercial credit, including as a guarantor to a business loan, the Company may check your consumer credit report and this check may be listed on your consumer credit report. For more information about your credit report you should contact the Office of the Australian Information Commissioner or creditsmart.org.au.

If the Company does not collect your personal information, it may not be able to provide you with these services.

4 What personal information does the Company collect?

The types of personal information collected by the Company include:

- (a) names;
- (b) contact details (including address, email address, telephone number(s) and other contact details);
- (c) date of birth;
- (d) other identification verification information, including photographic information, from personal identification documents (including your birth certificate, passport, driver's licence, pension card, citizenship certificate, tax notice assessment, Medicare card and utilities notices);
- (e) financial information about assets, occupation and income, account balances, bank account details, account activities, trust arrangements, payment history and transactions with us and third parties;
- (f) tax information including tax file number (**TFN**), tax returns and related information;
- (g) banking details;
- (h) professional and business information about membership of a professional association, partnerships, directorships, business names and trust arrangements;
- (i) identification information as required by the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth); and
- (j) other information you provide to us.

4.1 Sensitive Information

The personal information collected by the Company may include sensitive information, which is defined in the Privacy Act as information or an opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association,

religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information. The Company will only use sensitive information:

- (a) for the primary purpose for which it was obtained;
- (b) for a secondary purpose that is directly related to the primary purpose;
- (c) with your consent; or
- (d) where required or authorised by law.

5 How does the Company collect your personal information?

The Company will collect personal information only by lawful and fair means and not in an unreasonably intrusive manner. When you provide the Company with personal information you consent to the use, disclosure and handling of your personal information in accordance with this Privacy Policy and any subsequent amendments (see clause 13).

5.1 Collecting information from you

If it is reasonable and practical to do so, the Company will collect personal information directly from you.

Depending on how you choose to interact with the Company, the Company may collect your personal information through:

- (a) completion of an application or other form either online or in hard copy;
- (b) provision of original, or copies of, documentation whether delivered in person, by post or electronically;
- (c) direct communication via meetings or telephone meetings or exchanges;
- (d) email, or other electronic correspondence;
- (e) the Company's website; and
- (f) any other method used by you to provide personal information to the Company.

5.2 Collecting information from third parties

The Company may also collect information about you from other people or independent sources. For example, the Company may collect personal information about you from an information services provider, publicly maintained records or third parties such as workplace or professional advisers. The Company will only do so where it is not reasonable and practicable to collect the information from you directly. Where the Company has collected your information from a third party, such personal information will be held, used and disclosed by the Company in accordance with this Privacy Policy.

5.3 Collecting information from visits to the Company's website

The Company may also collect information based on how you use its website, including through 'cookies', web beacons and other similar technologies.

Cookies are small text files that are transferred to your computer's hard drive through your web browser to enable the Company's systems to recognise your browser and record non-personal information such as the date, time or duration of your visit and the

pages accessed, for website administration, statistical and maintenance purposes (**Cookie Information**).

We use cookies to provide you with a more consistent experience across our services. No attempt is made by the Company to use Cookie Information to personally identify you. However, if Cookie Information is linked with personal information as set out above, this Cookie Information becomes personal information and will be treated in the same manner as the personal information to which it has been linked.

You can remove or reject cookies by adjusting the settings on your web browser. Please note that some parts of the Company's website may not function fully for users that disable cookies.

5.4 Unsolicited information

If the Company receives personal information that it has not requested and determines that the personal information received is not reasonably necessary to provide its services, the Company will take all lawful and reasonable steps (if any) to de-identify or destroy that personal information.

6 How does the Company hold your personal information?

The security of your personal information is important to the Company. Accordingly, the Company takes reasonable steps to protect your personal information from misuse, loss and unauthorised access, modification or disclosure.

6.1 Security breach procedures

The Company's data security practices have been adopted with a view to protecting the data held by the Company. Notwithstanding this, you should be aware that there are inherent risks associated with the transmission of data over the internet and other mediums. Accordingly, the Company cannot guarantee any transmission will be completely secure, nor can it guarantee the safe delivery of personal information via ordinary post or other communication method.

7 How does the Company use your personal information?

The Company may hold, use or disclose your personal information so that it can provide its products and services to you, as you request.

The Company may also hold, use or disclose your personal information to:

- (a) assess the suitability of you or a related organisation for a debt facility or any other financing facility, or for participation in any equity or other investment;
- (b) consider any concern or complaint that you raise against the Company or to manage any legal action between you and the Company;
- (c) prevent or investigate any actual or suspected fraud, unlawful activity or misconduct; or
- (d) comply with any relevant laws, regulations, codes of practice and court orders.

7.1 Direct Marketing

The Company may also use your personal information to identify and promote products or services that may be of interest to you.

At any time you may opt out of receiving direct marketing communications from the Company. To do so, you may click on the opt out link in the email or contact the person in clause 12. Unless and until you opt out, your consent to receive direct marketing communications from the Company and to the handling of your personal information for this purpose will continue.

8 How is personal information disclosed to others?

The Company does not sell, rent or trade personal information to, or with third parties.

The Company may disclose your personal information to third parties in limited circumstances, including to:

- (a) external providers that perform services on behalf of the Company;
- (b) government departments or other regulatory authorities and professional associations, when requested or required to do so;
- (c) our lawyers, auditors and other advisors;
- (d) financial market and clearing and settlement facility operators;
- (e) current or potential investors, lenders or third-party credit providers;
- (f) insurers and audit insurance providers;
- (g) credit reporting agencies; and
- (h) third parties engaged to perform administrative tasks on behalf of the Company.

The Company's website may contain certain links to other websites. The Company does not share your personal information with those websites and it is not responsible for the privacy practices applying in respect of those websites.

8.1 Cross-border disclosure

The Company may transfer your personal information to an entity which is in a foreign country to assist the Company in providing its products or services. For example, your personal information may be stored on servers located overseas by our third-party cloud storage providers, or it may be provided to current or potential non-resident investors or capital providers where the provision of our products or services requires the transfer of the information.

9 Change of control

If the Company sells, assigns or otherwise transfers part or the whole of its business, your personal information, which was collected by the Company through your use of its services, may be among the items transferred or sold to the extent that it is relevant to the Company's business.

10 How you may access or correct your personal information

You may contact the Company to request access to the personal information it holds about you at any time. You may also ask the Company to correct information about you that you may believe is inaccurate, incomplete or out of date.

Please contact the Company using the contact details set out in clause 12. The Company will need to verify your identity before giving you access to, or correcting, your personal information. The Company will respond to the request within a reasonable period after the request is made. There is no charge to make a request, however the Company may charge a reasonable fee to cover the administrative costs of retrieving your personal information.

In certain circumstances, the Company may refuse, or be unable, to correct or provide you with access to your personal information. In these circumstances, the Company will write to you to explain the reasons why this is the case.

11 How you may complain if you have concerns about how the Company has managed your personal information

If you have a complaint related to how the Company has managed your personal information, please contact the Company using the contact details set out in clause 12. The Company may ask you to place your concerns in writing so that its compliance staff can fully understand and investigate your complaint.

The Company will provide you with an estimated response timeframe in relation to your complaint. In any event, the Company will endeavour to respond to your complaint within 30 days.

If a complaint remains unresolved or in the event that you are dissatisfied with the outcome of your complaint, you may refer the complaint to the Office of the Australian Information Commissioner (**OAIC**) on 1300 363 992 or at www.oaic.gov.au.

12 How to contact us

If you have any questions about this Privacy Policy or the Company's management of your personal information, please contact the Company on:

Tel: +613 9452 0220

Email: compliance@ida.com.au

Mail: Level 21, 627 Chapel Street, South Yarra, VIC 3141

Attention: Compliance Officer

13 Changes to the Company's privacy policy and information handling practices

This Privacy Policy is subject to change at any time, so we encourage you to review this Privacy Policy at regular intervals. If the Company changes this Privacy Policy an updated version will be posted on the Company's website to notify you of this change. By continuing to use the Company's services after that time you will be deemed to have accepted any changes to its Privacy Policy.