



## Privacy Policy

In this Privacy Policy, **we, us, our,** or **Rennie**, means Rennie Advisory Pty Ltd (ABN 26 629 902 08). Rennie is also a corporate authorised representative (CAR 1297656) of Sandford Capital Pty Limited (ABN 82 600 590 887) (AFSL 461981), and where applicable this policy will also apply to any clients and stakeholders we engage from time to time in relation to financial services.

We recognise that your privacy is very important and we are committed to protecting the personal information we collect from you. The *Privacy Act 1988* (Cth) (**Privacy Act**), and the Australian Privacy Principles (**APPs**) govern the way in which we must manage your personal information and this policy sets out how we collect, use, disclose and otherwise manage personal information about you.

### Personal information

The types of personal information we may generally collect about you include:

- your name;
- your contact details, including email address, mailing address, street address and/or telephone number;
- your credit card and bank account details;
- your demographic information, such as postcode;
- your preferences and/or opinions;
- where you are our employee (and in addition to any other personal information specified within this list), your specified gender, health information that you voluntarily disclose to us, any criminal history obtained during the course of a third party background check;
- credit information, in certain circumstances where you apply for a role with us;
- information you provide to us through customer surveys;
- details of products and services we have provided to you and/or that you have enquired about, and our response to you;
- details of your business operations including but not limited to place and type of business;
- your browser session and geo-location data, device and network information, statistics on page views and sessions, acquisition sources, search queries and/or browsing behaviour;
- information about your access and use of our website, including through the use of Internet cookies, your communications with our website, the type of browser you are using, the type of operating system you are using and the domain name of your Internet service provider;
- additional personal information that you provide to us, directly or indirectly, through your use of our website, associated applications, associated social media platforms and/or accounts from which you permit us to collect information; and
- any other personal information requested by us and/or provided by you or a third party.

We may collect these types of personal information directly from you, from third parties, or from publicly available sources of information.

When you speak to us about our provision of financial services to you (for example, financial advice or applying for an interest in a fund), we may also collect information that is necessary to be able to provide



you with financial services. Any unsolicited personal information we may collect will be promptly destroyed.

### Method of collection

Personal information will generally be collected directly from you through the use of any of our standard forms, over the internet, via email, or through a telephone conversation with you. We may also collect personal information about you from third parties acting on your behalf.

There may, however, be some instances where personal information about you will be collected indirectly because it is unreasonable or impractical to collect personal information directly from you. We will usually notify you about these instances in advance, or where that is not possible, as soon as reasonably practicable after the information has been collected.

### Collection and use of personal information

The personal information that we collect and hold about you, depends on your interaction with us. Generally, we may collect, hold, use and disclose personal information if it is reasonably necessary for or directly related to the performance of our functions and activities and for the purposes of:

- providing services to you or someone else you know;
- responding to your enquiries;
- to enable you to access and use our website, associated applications and associated social media platforms;
- to contact and communicate with you;
- for internal record keeping, business operations, and administrative purposes;
- for analytics, market research and business development, including to operate and improve our services, website, associated applications and associated social media platforms;
- for advertising and marketing, including to send you promotional information about our products and services and information about third parties that we consider may be of interest to you;
- to comply with our legal obligations and resolve any disputes that we may have;
- contacting you to provide a testimonial or reference for us; and
- to consider your employment application.

In relation to personal information that has been collected for the purposes of providing you with financial services, we may use this personal information to:

- check your eligibility for our financial services;
- provide you with financial services;
- offer you further financial services that we believe may interest you (unless you have told us not to do this); and
- help you manage our financial services.

### Disclosure of personal information to third parties

Generally, we only use or disclose personal information about you for the purposes for which it was collected (as set out above). We may disclose personal information about you to:

- third party service providers for the purpose of enabling them to provide their services, including (without limitation) IT service providers, data storage, web-hosting and server providers, debt



collectors, maintenance or problem-solving providers, marketing or advertising providers, professional advisors and payment systems operators;

- our employees, contractors and/or related entities;
- our existing or potential agents or business partners;
- sponsors or promoters of any competition we run;
- anyone to whom our business or assets (or any part of them) are, or may (in good faith) be, transferred;
- courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services we have provided to you;
- courts, tribunals, regulatory authorities and law enforcement officers, as required by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights;
- third parties, including agents or sub-contractors, who assist us in providing information, products, services or direct marketing to you. This may include parties located, or that store data, outside of Australia; and
- third parties to collect and process data, such as Google Analytics or other relevant businesses. This may include parties that store data outside of Australia.

We may store your personal information overseas. For instance, our third party service providers or other recipients may be based overseas or may use infrastructure outside Australia, including the United States of America.

Where we disclose your personal information to the third parties listed above, these third parties may also store, transfer or access personal information outside of Australia.

Unless we seek and receive your consent to an overseas disclosure of your personal information, we will only disclose your personal information to countries with laws which protect your personal information in a way which is substantially similar to the Australian Privacy Principles and/or we will take such steps as are reasonable in the circumstances to require that overseas recipients protect your personal information in accordance with the Australian Privacy Principles.

#### **How we treat personal information that is also sensitive information**

Sensitive information is a subset of personal information that is given a higher level of protection under the Australian Privacy Principles.

Sensitive information includes:

- an individual's racial or ethnic origin;
- health information;
- political opinions;
- membership of a political association;
- professional or trade association or trade union;
- religious beliefs or affiliations;
- philosophical beliefs;

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- sexual orientation or practices;
- criminal record;
- genetic information;
- biometric information that is to be used for certain purposes; and
- biometric templates.

We only collect, hold, use and disclose sensitive information for the following purposes:

- any purposes you consent to;
- the primary purpose for which it is collected;
- secondary purposes that are directly related to the primary purpose for which it was collected, including disclosure to the above listed third parties as reasonably necessary to provide our services to you;
- to contact emergency services, or to speak with your family, partner or support person where we reasonably believe there is a serious risk to the life, health or safety of you or another person and it is impracticable for us to obtain your consent; and
- if otherwise required or authorised by law.

## Your rights and controlling your personal information

**Choice and consent:** Please read this Privacy Policy carefully. By providing personal information to us, you understand we will collect, hold, use and disclose your personal information in accordance with this Privacy Policy. You do not have to provide personal information to us, however, if you do not, or if the personal information you provide to us is incomplete or inaccurate, it may affect your use of our website or the products and/or services offered on or through it, and we may be unable to provide you, or someone else you know, with the products and/or services you, or they, are seeking.

**Information from third parties:** If we receive personal information about you from a third party, we will protect it as set out in this Privacy Policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

**Restrict:** You may choose to restrict the collection or use of your personal information. If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by contacting us using the details below.

**Access:** You may request details of the personal information that we hold about you. An administrative fee may be payable for the provision of such information. We will respond to your request within a reasonable period. We may charge you a reasonable fee for processing your request (but not for making the request for access). In certain circumstances, as set out in the *Privacy Act 1988* (Cth), we may refuse to provide you with personal information that we hold about you, and if we do, we will give you a written notice that sets out the reasons for the refusal (unless it would be unreasonable to provide those reasons), including details of the mechanisms available to you to make a complaint.

**Correction:** If you believe that any personal information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us using the details below. We will take reasonable steps to correct any personal information found to be inaccurate, incomplete, or out of date. If we refuse to correct your personal information, we will give you a written notice that sets out our reasons for our refusal (unless it would be unreasonable to provide those reasons), including details of the mechanisms



available to you to make a complaint.

**Complaints:** If you believe that we have breached the *Privacy Act 1988* (Cth), APPs, or a privacy code that applies to us, and wish to make a complaint, please contact us using the details below and provide us with full details of the alleged breach. We will take reasonable steps to investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take to deal with your complaint.

If after this process you are not satisfied with our response, you can submit a complaint to the Office of the Information Commissioner. To lodge a complaint, visit the 'Complaints' section of the Information Commissioner's website, located at <http://www.oaic.gov.au/privacy/privacy-complaints>, to obtain the relevant complaint forms, or contact the Information Commissioner's office.

**Unsubscribe:** To unsubscribe from our e-mail database or opt-out of communications (including marketing communications), please contact us using the details below or opt-out using the opt-out facilities provided in the communication.

### Storage and security

We store your personal information in different ways, including in paper and in electronic form. We are committed to ensuring that the personal information we collect is secure. We take all reasonable measures to ensure that your personal information is stored safely to protect it from interference, misuse, loss, unauthorised access, modification or disclosure, including electronic and physical security measures.

We cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk. Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that the personal information we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

### Cookies and web beacons

We may use cookies on our website from time to time. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally identifiable information. However, they do allow third parties, such as Google and Facebook, to cause our advertisements to appear on your social media and online media feeds as part of our retargeting campaigns. If and when you choose to provide our website with personal information, this information may be linked to the data stored in the cookie.

We may use web beacons on our website from time to time. Web beacons (also known as Clear GIFs) are small pieces of code placed on a web page to monitor the visitor's behaviour and collect data about the visitor's viewing of a web page. For example, web beacons can be used to count the users who visit a web page or to deliver a cookie to the browser of a visitor viewing that page.

### Links to other websites

Our website may contain links to other websites. We do not have any control over those websites, and we are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Privacy Policy.

### Amendments

We may, at any time and at our discretion, vary this Privacy Policy by publishing the amended Privacy Policy on our website. You can see when this Privacy Policy was last updated by checking the "last updated" date



displayed at the bottom of this Privacy Policy. We recommend you check our website regularly to ensure you are aware of our current Privacy Policy.

For any questions and notices, please contact us at:

Rennie Advisory Pty Ltd

Email:

[admin@rennieadvisory.com.au](mailto:admin@rennieadvisory.com.au)

Last updated: 1 August 2024

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