

This Policy applies to InvestSMART Group Ltd (ABN 62 111 772 359) and its related entities from time to time, including:

- InvestSMART Financial Services Pty Ltd (ABN 70 089 038 531);
- InvestSMART Funds Management Pty Ltd (ABN 62 067 751 759);
- InvestSMART Publishing Pty Ltd (ABN 12 108 915 233) (publisher of Intelligent Investor);
- InvestSMART Advice Pty Limited (ABN 81 119 670 334);
- Eureka Report Pty Ltd (ABN 84 111 063 686) (publisher of Eureka Report);
- The Intelligent Investor Holdings Pty Limited (ABN 57 109 360 983)
- YourShare Financial Services Pty Ltd (ABN 32 122 332 503);
- Kohler & Company Pty Ltd (ABN 54 610 863 128) (publisher of The Constant Investor); and
- InvestSMART Insurance Pty Ltd (ABN 86 156 522 548)

(Us, we, our)

We are bound by the Privacy Act 1988 (*Cwth*) (**Privacy Act**), Australian Privacy Principles (**APPs**) and any registered privacy codes that apply to it. This Policy sets out:

- what kind of information we collect;
- how we collect it;
- why we collect it;
- how we use it;
- how we disclose it;
- opting in and out of marketing activities;
- management and security;
- how to seek access to and update your personal information; and
- how to contact us or make a complaint.

We may, from time to time, review and update this Policy, including to take account of new or amended laws, new technology and/or changes to our operations. All personal information held by us will be governed by the most recently updated Policy. This Policy was updated in January 2020.

What information we collect

Personal Information is any information or opinion about an identified individual or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is stored in a material form or not.

We only collect personal information that is directly related to, or reasonably necessary for, our functions and activities.

In general, the personal information we collect about you includes (but is not limited to) your name, date of birth, residential address, contact details (including phone numbers and physical and electronic addresses) and in some circumstances, financial information (including your bank account details so we can make payments via Electronic Funds Transfers). We may also collect data relating to your activity on our websites (including IP addresses) via tracking technologies such as cookies, or we may collect information from you in response to a survey. We generally use this information to report statistics, analyse trends, administer our services, diagnose problems and target and improve the quality of our products and services. To the extent this information does not constitute personal information, the APPs do not apply and we may use this information in ways not covered by this Policy. We generally advise that you do not publish or communicate personal information, or at least limit the personal information that you publish or communicate, to the public via our services, such as in our forums or blogs (**Non-Confidential Information**). You acknowledge that we cannot control any third party collection or use of your Non-Confidential Information. You agree that we may use and disclose Non-Confidential Information for any purpose and by any means whatsoever.

How we collect personal information

We collect personal information directly from you whenever practical, and for example, may collect your personal information when you request or acquire a product or service from us, register or subscribe with us as a member, provide a product or service to us, complete a survey or questionnaire, enter a competition or event, contribute in a fundraising event, participate in our services (including our radio programs, blogs and forums) or when you communicate with us by e-mail, telephone or in writing (for example, if you contact customer service to make a complaint or provide feedback). We may also collect your personal information from a variety of third party sources, such as advertisers, mailing lists, recruitment agencies, contractors and business partners.

If, at any time, you provide personal or other information about someone other than yourself, you warrant that you have that person's consent to provide such information for the purpose specified.

Cookies

We may collect your personal information through the use of cookies and other tracking devices. When you access our websites, we may send a "cookie" (which is a small summary file containing a unique ID number) to your device. This enables us to recognise your device each time you visit our websites, without requesting you to register or log-in. It also helps us keep track of products or services you view, so that we can send you news about those products or services.

We use cookies to measure traffic patterns, to determine which areas of our websites have been visited, and to measure transaction patterns in the aggregate. We use this to research our users' habits so that we can improve our online products and services. If you do not wish to receive cookies, you can set your browser so that your device does not accept them. We may also log IP addresses to analyse trends, administer the website, track user movements, and gather broad demographic information.

We may also collect anonymous data (which is not personal information) relating to your activity on our websites (including IP addresses) via cookies, or we may collect information from you in response to a survey. We generally use this information to report statistics, analyse trends, administer our services, diagnose problems and target and improve

the quality of our products and services. To the extent this information does not constitute personal information because it does not identify you or anyone else, the Australian Privacy Principles do not apply and we may use this information for any purpose and by any means whatsoever.

Why we collect personal information

The primary purpose for which we collect information about you is to provide you with products and services you have requested. We also collect information about you for the purposes outlined below. We may state a more specific purpose at the point we collect your information. If you do not provide us with the information that we request, we may not be able to provide you with our products or services. For example, if you do not register as a member of a website, you will not be able to access features or services that are reserved for members only.

How we use personal information

In addition to the primary purpose outlined above, we may use the personal information we collect, and you consent to us using your personal information:

- to provide you with news and information about our products and services;
- to send marketing and promotional material that we believe you may be interested in. This material may relate to any business conducted by us or a third party business which we believe may be of interest to you;
- for purposes necessary or incidental to the provision of goods and services to you;
- to personalise and customise your experiences;
- to manage and enhance our products and services;
- to communicate with you, including by email, mail or telephone;
- to conduct competitions or promotions on our behalf and on behalf of selected third parties;
- to verify your identity;
- to investigate any complaints about or made by you, or if we have reason to suspect that you are in breach of any of our terms and conditions or that you are or have been otherwise engaged in any unlawful activity;
- to fulfil our legal obligations and to carry out our internal business functions; and/or
- as required or permitted by any law (including the Privacy Act)

In some circumstances, the law may permit or require us to use or disclose personal information for other purposes (for instance where you would reasonably expect us to and the purpose is related to the purpose of collection).

How we disclose personal information

We will disclose your personal information, and you consent to us disclosing your personal information, to InvestSMART Group Ltd and to any of its related entities (in which case, your personal information will be collected, used, disclosed, managed and stored in accordance with this Policy). We may also disclose personal information, and you consent to us disclosing your personal information, to third parties:

- engaged by us to perform functions or provide products and services on our behalf, such as processing credit card information, mailouts, financial recovery, marketing, research and advertising;
- that are our agents, business partners or joint venture entities or partners;

- that sponsor or promote any competition that we conduct or promote via our services;
- authorised by you to receive information held by us;
- as part of any investigation into you or your activity, for example, if we have reason to suspect that you have committed a breach of any of our terms and conditions, or have otherwise been engaged in any unlawful activity, and we reasonably believe that disclosure is necessary to the Police, any relevant authority or enforcement body, or your Internet Service Provider or network administrator;
- as part of a sale (or proposed sale) of all or part of our business; and/or
- as required or permitted by any law (including the Privacy Act).

We store your personal information in Australia, though some of our multinational service suppliers may store this information overseas. We are unable to determine in which countries this information may be held. We are unlikely to disclose your personal information overseas.

As mandated by the Office of the Australian Information Commissioner (Commissioner), if an eligible data breach occurs which causes serious harm to an individual, InvestSMART Group Ltd will have to notify the Commissioner of such a breach. This requirement is known as the Notifiable Data Breaches Scheme, effective 22nd February 2018. Your personal details may be provided to the Commissioner and the individual themselves will be notified of the matter, should such an occurrence arise.

Opting out

You may “opt out” from receiving communications from us or from third parties that send communications to you in accordance with this Policy. For example, you may unsubscribe from e-newsletters and other marketing or promotional material sent by us. You may “opt out” from receiving these communications by clicking on the unsubscribe link at the end of an email, or by updating your personal details on our websites, or by contacting us through any of the channels disclosed in the **Contacting us, complaints and feedback** section below.

If you receive communications purporting to be connected with us or our services that you believe have been sent to you other than in accordance with this Policy, or in breach of any law, please contact us through any of the channels disclosed in the **Contacting us, complaints and feedback** section below.

Management and security

We have appointed a Privacy Officer to oversee the management of personal information in accordance with this Policy and the Privacy Act. Other than in relation to Non-Confidential Information, we will take all reasonable steps to protect the personal information that we hold from misuse, loss, interference or unauthorised access, including by means of appropriate physical measure and appropriate electronic measures such as firewalls, pass word access, secure servers and encryption of credit card transactions.

However, you acknowledge that the security of online transactions and the security of communications sent by electronic means or by post cannot be guaranteed. You provide information to us via the internet or by post at your own risk. We cannot accept responsibility for misuse or loss of, or unauthorised access to, your personal information where the security of information is not within our control. You acknowledge that we are not responsible for the privacy or security practices of any third party (including third parties that we are permitted to disclose your personal information to in accordance with this policy or any applicable laws). The collection and use of your information by such third party/ies may be subject to separate privacy and security policies. If you suspect any misuse or loss of, or unauthorised access to, your personal information, please let us know immediately through any of the channels disclosed in the **Contacting us, complaints and feedback** section below.

Accessing and correcting your information

We take reasonable steps to ensure only required data is held and that all personal information is complete and accurate. We request that you keep your information as current as possible so that we may continue to improve our service to you.

Subject to some exceptions in the Privacy Act, you have the right to seek access the personal information we hold about you. If you make an access request, we will ask you to verify your identity. We may charge a fee to cover the costs of meeting your request, for example cancelling and re-issuing a cheque payment sent to an out-dated address. If we refuse your request for access, we will give you written reasons within a reasonable time (unless it would be unreasonable to provide those reasons).

If you are registered with us as a member, you are able to change and update your profile at any time. Should you require assistance with updating your data or removing your details, this can be done by contacting us through any of the channels disclosed in the **Contacting us, complaints and feedback** section below. You may also unsubscribe from our services at any time by contacting us through any of those channels.

If personal information you have provided us has changed or your circumstances change, or you believe that the data we hold is not accurate, please contact us through any of the channels disclosed in the **Contacting us, complaints and feedback section** below and we will consider your request to correct the information. We will usually correct your information within a reasonable time. If we refuse to correct your personal information, we will provide you with a written notice that sets out the reasons for our refusal (unless it would be unreasonable to provide those reasons) and provide you with a statement regarding the mechanisms available to you to make a complaint.

Contacting us, complaints and feedback

If you would like to seek access to personal information we hold about you, or if you have any questions or complaints about how we collect, use, disclose, manage or store your personal information, you can contact us via the below channels:

Postal Address:

Privacy Officer
InvestSMART Group Ltd
PO Box 744
QVB NSW 1230
Australia

Telephone: 1300 880 160 (International Calls: +61 2 8596 9511)

Email: compliancegroup@investsmart.com.au

If you make a complaint, we will take reasonable steps to investigate the complaint and respond to you within a reasonable time. If you are not happy with our response, you may complain directly to the Office of the Australian Information Commissioner at www.oaic.gov.au.

For more information about privacy in general, or if you are dissatisfied with our response to your complaint, you can contact the Office of the Australian Information Commissioner at www.oaic.gov.au.