

PRIVACY POLICY

ELEVARE Strategic Marketing Consulting (ESMC / ELEVARE SMC)

We take Privacy very seriously at ELEVARE SMC.

We collect different types of personal information depending on the nature of our engagement with you from a number of different sources including:

- directly from you
- when you use our products or services including our online services
- from outside sources and third parties.

The primary purposes for which we collect personal information from you is to provide you with our products and services and to best manage our relationship with you. We may also collect your personal information for reasons associated with these primary purposes. Rest assured, we will only use your personal information if we have a lawful reason to do so.

The security of your personal information is very important to us and we have systems in place to protect the personal information we hold. We store the personal information we collect in both hard copy as well as electronic formats in secure storage with restricted access.

To access or update your personal information, make a complaint, or you would like to obtain further information in relation to ELEVARE SMC's privacy practices, please contact James Keogh: james.keogh@elevaremarketing.com.au or on m: 0402 274 641.

ELEVARE SMC Privacy Policy

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

In this Privacy Policy, 'ELEVARE SMC', 'we', 'us' and 'our' refer to the ELEVARE SMC Partnership and includes any entity carrying on business in Australia that is part of the ELEVARE SMC group of entities.

We may need to update this Privacy Policy from time to time to reflect our current privacy practices or changes in the law. When we make any material changes to this Privacy Policy, we will post the updated policy on our website.

1. PERSONAL INFORMATION WE COLLECT

The types of personal information we collect depends on the nature of our engagement with you.

Examples of personal information we may collect include:

- General identification information such as names, job title, occupation, date of birth and gender.

- Contact details such as address, email address, phone and mobile phone number and Internet Protocol (IP) address.
- Usernames and passwords.
- Financial information such as credit card and bank account details, shareholdings and details of investments (e.g. if you have shares, units, managed funds or other investments, details of dividend payments and distributions from managed funds, any investment gains or losses from the disposal of shares, units and rental properties, including associated income and expenditure).

It may be necessary in some circumstances for us to collect some forms of sensitive information about you in order to provide specific services to you. Sensitive information includes information about a person's race, gender diversity, sexual orientation, disability, ethnic origin, political opinions, health, religious or philosophical beliefs and criminal history. We will only collect and use sensitive information with your consent, in accordance with applicable laws or in a de-identified aggregated manner.

You might need to provide personal information about other individuals to us (e.g. about your spouse, dependents or other family members). If so, we rely on you to have informed those individuals that you are giving their personal information to us and to have advised them about this Privacy Policy and how they can obtain a copy of it.

It is important to be aware that if you access another party's website or application using one of our products or services or via our website, that other party will deal with your personal information in accordance with its own Privacy Policy. You will need to review those websites to view a copy of the relevant Privacy Policy.

It is generally not practical to remain anonymous or to use a pseudonym when dealing with us as usually we need to use your personal information to provide specific services to you, or which relate to or involve you. **2. COLLECTING PERSONAL INFORMATION**

Generally, we collect your personal information from you directly, for example, when we deal with you in person or over the phone, when you send us correspondence (including via email), when you complete a questionnaire, form or survey or when you subscribe to our publications.

Sometimes we will collect your personal information from outside sources. These can include marketing mailing lists and other public information (including public posts to social networking sites such as LinkedIn and Twitter) and commercially available personal, identity, geographic and demographic information. Outside sources may also include information gained from a third party.

We may also collect personal information about you from your use of our websites and social media and information you provide to us through contact mailboxes.

3. HOLDING PERSONAL INFORMATION

We hold personal information in electronic formats. In some cases, we engage third parties to host electronic data (including data in relation to the services we provide) on our behalf. We take security measures to protect the personal information we hold which includes physical controls.

We also have policies and processes which govern document retention and data breach incidents. We endeavour to ensure that personal information is kept as current as possible and that irrelevant or excessive data is deleted or made anonymous as soon as reasonably practicable. However, some personal information may be retained for varying time periods in order to comply with legal and regulatory obligations and for other legitimate business reasons.

4. PURPOSE FOR COLLECTING, HOLDING, USING AND DISCLOSING PERSONAL INFORMATION

We will only use your information if we have a lawful reason to do so such as when it's our legal duty, if we have your consent and when it's in our legitimate interest to do so. Reasons include:

- To provide our services to you or to our client in accordance with the terms of any engagement letter, service agreement or employment agreement including any related reasons such as payroll, tax, superannuation and accounting services.
- To provide, improve and properly manage our products and services and those of other ELEVARE SMC member firms including:
 - o developing new products,
 - o responding to requests or queries,
 - o verifying your identity,
 - o to conduct surveys,
 - o seeking your feedback.
- To maintain contact with our clients and other contacts (including alumni), and keep them informed of our services, industry developments, seminars and other events.
- For administrative purposes, including:
 - o processing payment transactions,
 - o charging and billing,
 - o detecting or preventing fraud,
 - o identifying breaches of our terms and conditions of engagement.
- For purposes relating to the employment of our personnel (including Partners), contractors and sub-contractors including:
 - o recruitment purposes such as contacting referees, processing applications, administering psychometric testing, assessment for suitability for future positions, background checks and ongoing analytic purposes such as ensuring we are reaching a diverse range of candidates,
 - o providing internal services or benefits to our Partners and staff,
 - o matters relating to the ELEVARE SMC partnership.
- For governance and compliance purposes including:

- o managing any quality, conduct or risk management issues including conflict of interest or independence (including auditor independence) obligations or situations,
- o meeting regulatory obligations,
- o where we are required to or authorised by legislation or industry code, direction or standard to do so.
- For business purposes such as part of an actual (or proposed) acquisition, disposition, merger or de-merger of a business (including ELEVARE SMC's business) or entering into an alliance, joint venture or referral arrangement.
- For development and analytics purposes to develop our expertise and know how, including:
 - o for benchmarking purposes,
 - o development, analytics and business intelligence functions including web-site trend and performance analysis.
 - o quality assurance and thought leadership, and
 - o other purposes related to our business.

We may also use non-personal, de-identified and aggregated information for several purposes including for data analytics, research, submissions, thought leadership and promotional purposes. Any output is anonymised or aggregated so that no personal information or information relating specifically to you is reasonably identifiable.

ELEVARE SMC may also use your personal information for the purpose of marketing its services to you. This may include products, services and offers provided by our alliance partners. If you do not want to receive marketing material from us, you can contact us as detailed below:

- for electronic communications, you can click on the unsubscribe function in communications
- for hard copy communications, you can email info@elevaremarketing.com.au

5. SHARING PERSONAL INFORMATION

We may share your personal information with other parties including:

- Your authorised representatives, advisors and referees,
- Personnel within ELEVARE SMC and our professional advisors,
- Experts or other third parties contracted as part of an engagement,
- Our agents, third party contractors and suppliers that assist us with providing our business processes and products and services,
- Other parties when you ask us to do so or when you consent to that disclosure.

Where you are a customer, an employee, a contractor or supplier of services to one of our clients, then we may disclose your personal information as part of providing services to that client.

We do not disclose personal information to third parties for the purpose of allowing them to send marketing material to you. However, we may share non-personal, de-identified or aggregated information with select third parties for research, development, analytics or promotional purposes other than direct marketing.

6. VISITING OUR WEBSITE AND ONLINE

6.1 Automatic collection of personal information

Together with our service providers we use cookies, web beacons and other technologies on some of our websites and through email to automatically collect certain types of information. The collection of this information allows us to customise and personalise your online experience (including tailoring our online presence) and enhancing your future online experience. We may also use this information for development and analytics purposes.

6.2 Analytics Tools

We use analytics tools, such as Google Analytics and Adobe Analytics. To provide website visitors with more choice on how their data is collected by Google Analytics, Google have developed the Google Analytics Opt-out Browser Add-on. More information about how we use Google Analytics can be found at <https://www.google.com/analytics/terms/us.html>

Adobe also provides a range of opt-out options for Adobe Analytics.

6.3 Social media widgets and applications

Some of our websites and services may include functionality to enable information sharing via third party social media applications, such as the Facebook Like button and Twitter widget. These social media applications may collect and use information regarding your use of our websites. Any personal information that you provide via such social media applications may be collected and used by members of that social media application separate to us and are subject to the privacy policies of the relevant companies that provide the applications. We do not have control over, or responsibility for, those companies or their use of your information.

Any personal information that you provide on any ELEVARE SMC social media feature may be shared with other users of that social media feature (unless otherwise stated at the point of collection), over whom we may have limited or no control.

7. CHILDREN

We understand the critical importance of protecting the privacy of children, especially in an online environment. In particular, our websites are not intentionally designed for, or directed at, children under the age of 13.

It is our policy to never knowingly collect or maintain information about any person under the age of 13, except as part of a specific engagement to provide services which necessitates such personal information be collected, for the purposes of ensuring compliance with our auditor independence policies, or as otherwise required by law.

8. ACCESS TO PERSONAL INFORMATION

It's important that you make sure the personal information we hold about you is accurate, up to date and complete. If any of your details change or if you believe that any personal information ELEVARE SMC has collected about you is inaccurate you can contact us and we will take reasonable steps to correct it in accordance with the requirements of the *Privacy Act*.

9. COMPLAINTS

You can notify us of any complaint you may have about our handling of your personal information. We will endeavour to reply to you within 30 days of receipt of the correspondence and, where appropriate, will advise you of the general reasons for the outcome of the complaint.

While we hope that we will be able to resolve any complaints you may have without needing to involve third parties, if you are not satisfied with the outcome of your complaint, you can refer your complaint to the Office of the Australian Information Commissioner.

10. HOW TO CONTACT US

If you have any questions in relation to this Privacy Policy or our management of your personal information you can contact us at:

E: info@elevaremarketing.com.au

E: james.keogh@elevaremarketing.com.au

M: 0402 274 641