PRIVACY POLICY

Lionsgate Financial Group
ABN 92 140 591 484
Australian Financial Services Licence No. 342766

1. Purpose

Lionsgate Financial Group Pty Ltd (Lionsgate, we, us or our) is committed to protecting the privacy and security of personal information.

We manage personal information in accordance with the **Privacy Act 1988 (Cth)**, the **Australian Privacy Principles (APPs)** and other applicable legal and regulatory requirements.

This Privacy Policy explains:

- the kinds of personal information we collect and hold;
- how we collect and hold personal information;
- why we collect, use and disclose personal information;
- how we protect personal information;
- how you may access or correct your personal information;
- how you may make a privacy complaint; and
- circumstances in which information may be disclosed overseas.

2. Personal Information We Collect

The personal information we collect depends upon our relationship with you and the financial services being provided.

It may include:

- name, address and contact details;
- date of birth;
- identification information;
- employment and occupation;
- income and expenditure;
- assets and liabilities;
- superannuation and pension information;
- investment information;
- insurance information;
- taxation information;
- government benefit information;

- family and dependant information;
- estate-planning information;
- financial objectives and priorities;
- investment experience and attitude to risk;
- bank and payment information;
- correspondence and communications;
- information relating to complaints or enquiries; and
- other information reasonably necessary to provide financial services or comply with our obligations.

We may also collect government-related identifiers where permitted or required, including Tax File Numbers and identification-document details.

We do not use government-related identifiers as our own identifier of an individual.

3. Sensitive Information

In some circumstances we may need to collect sensitive information.

This may include information concerning:

- health;
- medical history;
- disability;
- membership of professional associations; or
- other sensitive information relevant to the financial services being provided.

Sensitive information will generally only be collected with your consent or where collection is otherwise permitted or required by law.

For example, health information may be relevant when providing personal insurance advice or assisting with an insurance application.

4. How We Collect Personal Information

Where reasonably practicable, we collect personal information directly from you.

Information may be collected through:

- meetings;
- telephone or video calls;
- Fact Finds and other forms;
- email and correspondence;
- our website;

- electronic client portals;
- financial planning software;
- applications and authorities;
- documents you provide;
- interactions with your financial adviser; and
- other electronic or written communications.

With your authority, or where otherwise permitted by law, we may also collect information from third parties including:

- superannuation funds;
- insurers;
- investment and platform providers;
- banks and financial institutions;
- accountants;
- lawyers;
- mortgage brokers;
- government agencies;
- product providers; and
- other professional advisers or service providers.

If you provide us with personal information about another person, you should ensure that you are authorised to provide that information where required.

5. Why We Collect Personal Information

We collect, hold, use and disclose personal information for purposes including:

- providing financial advice and financial services;
- understanding your objectives, financial situation and needs;
- preparing, reviewing and implementing financial advice;
- arranging financial products;
- providing ongoing services;
- communicating with you;
- maintaining client records;
- processing fees and payments;
- managing complaints;
- monitoring and supervising our authorised representatives;

- conducting compliance reviews and audits;
- managing professional indemnity insurance and claims;
- managing legal and regulatory obligations;
- preventing and detecting fraud or other unlawful activity;
- complying with taxation, AML/CTF and other legal requirements;
- managing our business; and
- other purposes reasonably related to the services we provide.

If we are unable to obtain information that is reasonably necessary, we may be unable to provide some or all of the financial services you request.

6. How We Use and Disclose Personal Information

We generally use or disclose personal information for the purpose for which it was collected, a related purpose you would reasonably expect, with your consent, or where otherwise permitted or required by law.

Depending upon the services provided, personal information may be disclosed to:

- your financial adviser;
- Lionsgate authorised representatives and Corporate Authorised Representatives;
- employees and contractors;
- paraplanners;
- financial product providers;
- superannuation funds and trustees;
- investment platforms;
- insurers;
- banks and other financial institutions;
- accountants and lawyers;
- auditors;
- compliance consultants;
- professional indemnity insurers, brokers and legal advisers;
- technology, software, cloud and data-storage providers;
- mailing, document-management and administrative service providers;
- government agencies and regulators including ASIC and AUSTRAC;
- AFCA;
- courts and tribunals; and

- other parties where authorised or required by law.

We take reasonable steps appropriate to the circumstances when engaging service providers that handle personal information on our behalf.

7. Authorised Representatives

Financial advice may be provided by an authorised representative or Corporate Authorised Representative of Lionsgate.

Personal information may therefore be held or accessed by Lionsgate and the authorised representative or practice responsible for providing your financial services.

Our representatives are required to comply with applicable privacy, confidentiality, information-security and record-keeping requirements.

If an adviser ceases to be authorised by Lionsgate, the handling or transfer of client information will be managed having regard to:

- applicable privacy requirements;
- client instructions or consent where required;
- Lionsgate's legal and regulatory record-keeping obligations;
- contractual obligations; and
- the circumstances of the adviser's departure.

Client information will not automatically transfer to another licensee merely because an adviser changes licensees.

8. Direct Marketing

We may use personal information to communicate with you about services, information or opportunities that we reasonably believe may be relevant to you where permitted by law.

You may ask us to stop sending direct marketing communications at any time by:

- using an unsubscribe facility provided in the communication;
- contacting your adviser; or
- contacting Lionsgate.

We will action opt-out requests within the period required by applicable law.

9. Overseas Disclosure

Some service providers used by Lionsgate, our advisers or financial product providers may store, process or access information outside Australia.

Where Lionsgate is likely to disclose personal information to an overseas recipient, we will comply with applicable requirements under the Privacy Act and Australian Privacy Principles.

Where practicable, information about countries in which overseas recipients are likely to be located will be made available to affected individuals.

Before disclosing personal information to an overseas recipient, APP 8 generally requires an APP entity to take reasonable steps to ensure that the recipient handles the information consistently with the APPs, subject to specified exceptions.

10. Security of Personal Information

We take reasonable steps to protect personal information from:

- misuse;
- interference;
- loss;
- unauthorised access;
- unauthorised modification; and
- unauthorised disclosure.

Security measures may include:

- secure electronic systems;
- access controls;
- passwords;
- multi-factor authentication;
- cybersecurity controls;
- secure cloud storage;
- backups;
- restricted staff and adviser access;
- physical security;
- staff and adviser training; and
- secure destruction or de-identification where appropriate.

APP 11 requires organisations to take reasonable steps to protect personal information they hold and, subject to applicable exceptions, destroy or de-identify information they no longer need.

No information-security system can eliminate every risk, and we regularly review our security arrangements having regard to the nature of the information we hold.

11. Data Breaches

Lionsgate maintains processes for responding to suspected or actual privacy and cybersecurity incidents.

Where we become aware of a potential data breach, we will assess the circumstances and take appropriate action.

Where a breach is an **eligible data breach** under the Notifiable Data Breaches scheme, we will notify affected individuals and the Office of the Australian Information Commissioner (OAIC) as required by law.

12. Retention of Personal Information

We retain personal information for as long as reasonably necessary for the purposes for which it is held and to comply with applicable legal, regulatory, professional and business requirements.

Financial advice and regulatory records may need to be retained for prescribed periods after advice is provided or after our relationship with you ends.

Where personal information is no longer required to be retained, we will take reasonable steps to securely destroy or de-identify it where required by law.

13. Quality and Correction of Personal Information

We take reasonable steps to ensure personal information we collect, use and disclose is accurate, up to date, complete and relevant for the purpose for which it is used.

Please notify us or your adviser if your circumstances or information change.

You may request correction of personal information that you believe is:

- inaccurate;
- out of date;
- incomplete;
- irrelevant; or
- misleading.

We will consider and respond to correction requests in accordance with applicable privacy requirements. APP 13 requires reasonable steps to correct information in these circumstances.

14. Access to Personal Information

You may request access to personal information that we hold about you.

We may need to verify your identity before providing access.

In some circumstances permitted by law, access may be refused or limited, including where providing access would:

- unreasonably affect another person's privacy;
- reveal commercially sensitive information;
- prejudice legal proceedings;
- be unlawful; or
- fall within another applicable exception.

Where access is refused, we will generally provide written reasons and information about available complaint mechanisms where required.

15. Website and Digital Services

When you use our website or other digital services, certain technical information may be collected automatically.

This may include:

- IP address;
- browser or device information;
- pages visited;
- date and time of access; and
- website usage information.

Cookies, analytics or similar technologies may be used to operate, secure and improve our website and digital services.

Third-party websites linked from our website operate independently and are subject to their own privacy practices.

16. Automated and Technology-Assisted Processes

Lionsgate and its advisers may use software, technology and automated tools to assist with administrative, compliance, analysis and financial advice processes.

Human advisers remain responsible for financial advice provided to clients.

Where applicable, we will comply with requirements concerning the use of personal information in automated decision-making processes.

From 10 December 2026, additional APP 1 requirements apply where an organisation has arranged for a computer program to use personal information in making, or substantially and directly assisting with, a decision that could reasonably be expected to significantly affect an individual's rights or interests.

17. Privacy Complaints

If you believe we have not handled your personal information appropriately, please contact us.

We will:

- acknowledge your complaint;
- investigate the circumstances;
- communicate with you as appropriate; and
- provide a response within a reasonable period.

Please provide sufficient information for us to understand and investigate your concern.

If you are dissatisfied with our response, you may be entitled to lodge a complaint with the **Office of the Australian Information Commissioner (OAIC)**.

Office of the Australian Information Commissioner

18. Contact Us

Privacy enquiries, access or correction requests and privacy complaints may be directed to:

Privacy Officer
Lionsgate Financial Group Pty Ltd
AFSL 342766

Address: Level 1, Unit 5, 2-6 Kingsway, Cronulla NSW 2230
Telephone: 1300 683 323
Email: info@lionsgatefinancial.com.au
Website: www.lionsgatefinancial.com.au