



PRIVACY POLICY

OUR COMMITMENT TO PROTECT YOUR PRIVACY

Merchant Funds Management Pty Ltd (Merchant) ACN 154 493 277 is a Corporate Authorised Representative (Authorised Representative No. 420444) of Draupner Investment Management Pty Ltd (ACN 112 894 845) (Draupner) under its Australian Financial Services License (AFSL) No. 303566.

Merchant Funds Management Pty Ltd and its affiliates (collectively known as "Merchant" and also referred to in this Policy as "us," "we" and "our") seeks to provide the best possible service to its customers by providing the best possible range of financial products and services.

We understand how important it is to protect your personal information. This document sets out our Privacy Policy commitment in respect of personal information that you may provide to us.

We recognise that any personal information we collect about you will only be used for the purposes indicated in our policy, where we have your consent to do so, or as otherwise required or authorised by law. It is important to us that you are confident that any personal information we collect from you or that is received by us will be treated with appropriate respect ensuring protection of your personal information.

Our commitment in respect of personal information is to abide by the Privacy Act 1988 (Cth) and any other relevant law.

WHO IS MERCHANT?

Merchant provides corporate advisory and full-service stockbroking services to wholesale clients in Australia. Merchant executes and clears through a third-party clearing member of the ASX Group, FinClear Execution Limited ABN 56 061 751, AFSL 246842.

PERSONAL INFORMATION

When we refer to **personal information** we mean information or an opinion about you, from which you are, or may reasonably be, identified.

This information may include (but is not limited to) your name, date of birth, driver's licence number, marital status, phone number, email address, address, nationality, employment history, income, assets and liabilities.

It is not common practice for us to collect other sensitive information about you (such as information about your religion, trade union membership, political opinion, sexual preference or criminal record). We will only collect sensitive information about you with your consent.



WHY WE COLLECT YOUR PERSONAL INFORMATION

We collect and receive personal information about you in order to conduct our business, including assessing and obtaining approval for Merchant on securities and other products and accepting investments. From time to time we may offer other products and services.

HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

Personal information may be collected by us in a number of circumstances, including when an individual:

- makes an enquiry with us via email or telephone;
- lodges an enquiry or requests a quote through our website;
- applies to invest in a product offered by us;
- attends an event hosted by us; or
- applies to work with us.

Where reasonable and practical we will collect your personal information only directly from you. However, we will also collect information about you from third parties such as from our contractors who supply services to us, through our referrers (such as financial advisers), from a publicly maintained record or from other individuals or companies as authorised by you. From time to time we may also purchase lists containing personal information about individuals from organisations offering such lists for marketing purposes.

If you do not provide the information requested by us, we may not be able to provide you with our services.

If you provide personal information to us about someone else, you must ensure that you are entitled to disclose that information to us and that, without us taking any further steps required by privacy laws, we may collect, use and disclose such information for the purposes described in this Privacy Policy. For example, you should take reasonable steps to ensure the individual concerned is aware of the various matters detailed in this Privacy Policy. The individual must also provide the consents set out in this Privacy Policy in respect of how we will deal with their personal information.

HOW DO WE USE YOUR PERSONAL INFORMATION?

We use your personal information for the purpose for which it has been provided, for reasonably related secondary purposes, any other purpose you have consented to and any other purpose permitted under the Privacy Act. This may include using your personal information for the following purposes:

- to provide you with the products or services you requested;
- to verify your identity;
- to assess, process and manage your application to be a customer, including to verify your details and assess our risk;
- to assess, process and manage your application to work with us; or
- for complaints handling or data analytics purposes.



TO WHOM WILL WE DISCLOSE YOUR PERSONAL INFORMATION?

To enable us to maintain a successful business relationship with you, we may disclose your personal information to:

- organisations that provide products or services used or marketed by us, including intermediaries (such as financial advisers), custodians and trustee companies, financial institutions, and execution and clearing providers;
- your employer/s or referees, your professional advisors, your bank and any other organisation that may have or is considering having an interest in your investment, or in our business;
- companies and contractors who we retain to provide services for us, such as IT contractors, call centres, stationery printing houses, mail houses, storage facilities, risk and compliance providers, lawyers, accountants and auditors, who will need to have access to your personal information to provide those services;
- people considering acquiring an interest in our business or assets; and
- other individuals or companies authorised by you.

By providing us with your personal information, you consent to us disclosing your information to such entities without obtaining your consent on a case by case basis.

Sometimes we are required or authorised by law to disclose your personal information. Circumstances in which we may disclose your personal information would be to a Court, Tribunal or law enforcement agency in response to a request or in response to a subpoena or to the Australian Taxation Office.

We may from time to time transfer personal information outside Australia in accordance with the Privacy Act to countries whose privacy laws do not provide the same level of protection as Australia's privacy laws. For example, we may transfer your personal information to the Asia-Pacific, European Union or the United States of America. We may also use cloud storage and IT servers that are located offshore.

By providing us with your personal information, you consent to us disclosing your information to entities located outside Australia and, when permitted by law to do so, on the basis that we are not required to take such steps as are reasonable in the circumstances to ensure that any overseas recipient complies with Australian privacy laws in relation to your information.

DIRECT MARKETING

From time to time we may use your personal information to provide you with current information about our products, special offers you may find of interest, changes to our organisation, or new products or services being offered by us or any company we are associated with. By providing us with your personal information, you consent to us using your information to contact you on an ongoing basis for this purpose, including by mail, email, SMS, social media and telephone.

If you do not wish to receive marketing information, you may at any time decline to receive such information by contacting our Privacy Contacts using the contact details below. We will not charge you for giving effect to your request and will take all reasonable steps to meet your request at the earliest possible opportunity.



UPDATING YOUR PERSONAL INFORMATION

It is important to our relationship that the personal information we hold about you is accurate and up to date. During our relationship with you we will ask you to inform us if any of your personal information has changed.

If you consider that any information we hold about you is incorrect, you should contact us to have it updated. We will generally rely on you to assist us in informing us if the information we hold about you is inaccurate or incomplete.

ACCESS TO YOUR PERSONAL INFORMATION

We will provide you with access to the personal information we hold about you, subject to limited exceptions in the Privacy Act as outlined below. You may request access to any of the personal information we hold about you, at any time.

To access personal information that we hold about you, use the contact details specified below. We may charge a fee for our reasonable costs in retrieving and supplying the information to you.

DENIED ACCESS TO PERSONAL INFORMATION

There may be situations where we are not required to provide you with access to your personal information. For example, such a situation would be information relating to an existing or anticipated legal proceeding with you, or if your request is vexatious.

An explanation will be provided to you if we deny you access to your personal information we hold.

BUSINESS WITHOUT IDENTIFYING YOU

In most circumstances it will be necessary for us to identify you in order to successfully do business with you, however, where it is lawful and practicable to do so, we will offer you the opportunity of doing business with us without providing us with personal information. Such a situation would be where you make general inquiries about interest rates or current promotional offers.

HOW SAFE AND SECURE IS YOUR PERSONAL INFORMATION THAT WE HOLD?

We will take reasonable steps to protect your personal information, including your credit-related personal information, by storing it in a secure environment, and when the information is no longer needed for any purpose for which the information may be used or disclosed, it will be destroyed or permanently de-identified.

We will also take reasonable steps to protect any personal information from misuse, loss and unauthorised access, modification or disclosure.



FURTHER INFORMATION AND COMPLAINTS

You may request further information about the way we manage your personal information or lodge a complaint by contacting our Privacy Officer(s) on the contact details below.

We will deal with any complaint by investigating the complaint, and providing a response to the complainant within 15 business days, provided that we have all necessary information and have completed any investigation required. In cases where further information, assessment or investigation is required, we will seek to agree alternative time frames with you.

CONTACT DETAILS

You can contact us by calling us on +61 8 6277 0050 or by writing to:

The Privacy Officer
Merchant Funds Management Pty Ltd
PO Box 883
Nedlands WA 6909

CHANGE IN OUR PRIVACY POLICY

We are constantly reviewing all of our policies and attempt to keep up to date with market expectations. Technology is constantly changing, as is the law and market practices.

As a consequence, we may change this Privacy Policy from time to time or as the need arises.

This Privacy Policy was last updated on **1 July 2017**.