

DDH Graham Limited Privacy Policy

DDH Graham Limited ABN 28 010 639 219 (referred to as “DDH”, “we’ and “us”) and its named related entities below recognise that the privacy of your personal information is important to you and is committed to protecting the privacy of any personal information it collects from you. Unless you give us your consent to do otherwise, we will only collect and use your personal information asset out below. This is also the privacy policy for ESP Group Pty Ltd ACN 074 905 061.

DDH abides by the Australian Privacy Principles (“APPs”) under the Privacy Act 1988 (Cth). This Privacy Policy outlines how we will handle and manage personal information we collect about you. You can obtain information about the APPs and your privacy rights at the website of the Office of the Australian Information Commissioner at www.oaic.gov.au/privacy-portal/.

What information do we collect?

We collect personal information that is necessary for us to conduct our business. Personal information is any information that can be used to identify you and may include:

- name;
- date of birth;
- address;
- telephone numbers;
- email address;
- occupation;
- financial information, including assets, income and superannuation details;
- bank account details; and
- tax file number.

Where relevant we may ask you for other information, for example, qualifications and employment history if you are applying for employment with us.

We also collect certain sensitive information (such as health information) but only where you have expressly consented to this collection.

How do we collect and hold your personal information?

We usually collect personal information in the following ways:

- Directly from you, either in person, in documents, by email, facsimile or via the DDH website,
- From third parties, such as your employer, financial advisers, stockbrokers, financial institutions or Self Managed Superannuation Fund administrators, where we have established accounts or other banking facilities in your name, business associates and business counterparties, lessors and solicitors; and
- From publicly available resources.

We hold personal information in hard copy and electronic files.

Collection of information from the DDH website

When using the DDH website you may voluntarily disclose personal information to us. Our service provider logs the following information for statistical purposes: your server address, top level domain name (eg .com, .gov, .au, .uk, etc.), the date and time of your visit, the pages accessed, the documents downloaded, the previous site visited and the type of browser used. This information is used for internal purposes only, including statistical purposes.

We will not try to identify users or their browsing activities except as necessary to investigate or report any suspected unlawful activity, as required or authorised by law or as reasonably necessary for the activity of an enforcement body.

The DDH website is cookie free. Unless you have provided it to us otherwise than through the DDH website, we will only record your email address if you send us a message. In those circumstances, your email address will not be automatically added to any mailinglist.

For what purposes do we collect personal information and what are the consequences of not providing us with the information requested?

Generally, we collect personal information about you:

- to provide you with a range of products and services, to meet our obligations to you and to enable us to conduct our business; and
- as required under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth).

We also collect personal information so you can seek employment with us or communicate with us in writing, by e-mail, telephone or via the DDH website.

If you do not give us the requested personal information, or if the information you give us is incomplete or inaccurate, we may be delayed or prevented from providing you any products or services, carrying any transaction for you, providing information to you, processing any application or otherwise meeting our obligations to you.

How do we use your personal information?

We use the personal information we collect primarily to provide you with a range of products and services, to meet our obligations to you and to enable us to conduct our business, including:

- administering and reporting to you on a variety of investment solutions, carrying out investments on your behalf as well as managing and reporting to you on your investments;
- providing you with superannuation administration services and insurance claims

- processing;
- establishing accounts or other banking facilities on your behalf with third party financial institutions, and administering your accounts or other banking facilities;
- negotiating and documenting leases and related decisions; communicating operational matters in relation to tenancies; and arranging for the sale of premises;
- conducting our internal business operations (including meeting any relevant legal requirements);
- managing client relationships and improving the services we provide;
- providing you with information about financial and superannuation products and services or events through our newsletters and other promotional materials; and
- assessing applications for employment.

To whom do we disclose personal information?

We will only disclose personal information for the purposes for which it was collected or in the following circumstances:

- Internally to our staff;
- To our related bodies corporate;
- To any person where necessary or desirable in connection with the provision of our products or services, including to financial institutions where we may establish accounts or other banking facilities on your behalf;
- To our professional advisers such as auditors, accountants and lawyers, insurance companies, property managers, consistent with normal business practices;
- To third parties we may engage from time to time to assist us in the promotion of our products and services, and who may receive limited personal information for that purpose;
- To external service providers in Australia, New Zealand, India and the United Kingdom (on a confidential basis) so they can provide us services related to our business, for example mailing services, IT services, unit registry and custodial services, archival services;
- Where required or authorised by law; and
- Where you consent to the disclosure.

Where applicable we may rely on employee and related bodies corporate exemptions that are available to us under the Privacy Act when using or disclosing personal information.

Cross-border disclosure of personal information

Some of our third-party contractors and service providers may perform certain services overseas. As a result, your personal information may be disclosed to a recipient in a foreign country, including in India, New Zealand and the United Kingdom. For example, we may use external service providers overseas so they can provide us services related to our business, for example mailing services and IT services. Under privacy laws effective from 12 March 2014, we must take reasonable steps, in the circumstances, before personal

information is disclosed to an overseas recipient to ensure that the overseas recipient does not breach privacy laws in relation to that information.

How secure and accurate is your personal information?

We will take reasonable steps to ensure that all personal information we collect or use is:

- accurate, complete, up-to-date, relevant and not misleading;
- stored in a secure environment; and
- protected from misuse and loss as well as unauthorised access, modification or disclosure.

If any of your details change, please let us know as soon as possible by using the contact details below so we can maintain the accuracy of your personal information.

Data breach notification

We acknowledge the introduction of a mandatory data breach notification scheme which commences on 22 February 2018. In the event of an 'eligible data breach' we will promptly notify the Office of the Australian Information Commission and any affected or at-risk individuals. Generally speaking, this would be when we have reasonable grounds to believe that there has been unauthorised access or disclosure of personal information, or that the information has been lost in a way that is likely to give rise to unauthorised access or disclosure. Importantly, we are only required to make a notification where there is a likely risk of serious harm as a result of the unauthorised access or disclosure.

If we notify you of a breach, where possible we will provide recommendations as to the steps you should take regarding the breach.

There are a number of exceptions that apply in relation to our obligation to notify you of an eligible data breach. These include where we have taken sufficient remedial action before any serious harm is caused.

How can you access and correct your personal information?

You have a right to access personal information we hold about you. We will comply with any request to access your personal information that you send us by email at privacy@ddhgraham.com.au except where the *Privacy Act 1988* (Cth) or the APPs allow us to refuse to do so. There is no fee for making a request to access your personal information but we may charge a fee for giving you access to your personal information in a mutually agreed format, usually by sighting the accessible information held on file.

You also have the right to ask us to correct information about you that is inaccurate, incomplete, out-of- date, irrelevant or misleading. If we refuse to correct your personal information as requested, we must:

- notify you in writing of the reasons for the refusal unless it would be unreasonable to do so, and how to complain of the refusal; and
- upon request from you that we associate a statement that the information is inaccurate, incomplete, out-of-date, irrelevant or misleading, take such steps as are reasonable in the circumstances to associate such a statement so that it will be apparent to users of the information

DDH links to other websites

Sometimes the DDH website may contain a link to third party websites. We are not responsible for the content or material contained in, or obtained through, any third-party website or for the privacy practices of the third-party website. We suggest that you review the privacy policy of each website that you visit.

How can I contact DDH?

If you have any questions or complaints about how we handle your personal information, you can contact our Privacy Co-ordinator, being our Company Secretary, on 1800 226 174 during business hours or email privacy@ddhgraham.com.au.

We will consider and respond to any complaint notified to us within 21 days. We will always endeavour to resolve any complaint to your satisfaction.

Australian Privacy Commissioner

If you are not satisfied with the way in which we handle your enquiry or complaint, you can contact the Office of the Australian Privacy Commissioner on Tel: 1300 363 992 or email: enquiries@oaic.gov.au.

Changes to this Privacy Policy

This is our current Privacy Policy as at December 2017 outlining our personal information management practices. This Policy replaces any other privacy policy published by us to date. We may vary this policy from time to time. We encourage you to review the DDH website regularly to ensure that you are aware of our current Privacy Policy.