

Privacy Policy

Policy last updated: October 2024, adopted by Board on 14 October 2024

Date	Version	Approved By	Revision History
5 April 2022	1.0	Board	Original policy
September 2024	2.0	Board	Revised policy
September 2026			Next Review Date

1 Purpose and nature

SEEK Growth Group Pty Ltd (ACN 651 143 305) (**Company, we, us, our**) recognises the importance of your privacy. This Privacy Policy explains how the Company intends to collect, store, use, disclose, protect and otherwise handle your personal information having regard to the Australian Privacy Principles (APPs) contained in the *Privacy Act 1988* (Cth) (**Privacy Act**).

This Privacy Policy does not constitute a contractual representation, promise, guarantee or warranty by the Company to you as to the manner in which the Company will or may collect, store, use, disclose, protect or otherwise handle your personal information.

This Privacy Policy applies to the Company and its related entities, such as its subsidiaries, and their employees. These related entities comply with the same obligations that the Company has to protect your personal information under this Privacy Policy.

2 What is personal information?

Personal information is information or an opinion about an identified, or reasonably identifiable individual, as defined in the Privacy Act irrespective of whether the information or opinion is:

- true or not; or
- recorded in material form or not.

This could include names, addresses, email addresses, phone numbers etc.

The way this information is obtained may vary but could include interviews, correspondence, telephone, email, websites, media, publicly available sources, cookies and from third parties.

3 Why does the Company collect personal information?

The Company collects personal information for the primary purpose of processing investment applications, including confirming your identify and confirming your

eligibility (financial and legal) to invest in the product or to utilise the services offered by us in managing and administering your investments and/or providing associated services to you, providing you with investment related communications, marketing and to support our broader business functions.

The Company may also use your personal information for related purposes. If we do not collect your personal information, we may not be able to provide you with our services.

When we collect Personal Information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

4 What personal information does the Company collect?

The types of personal information collected by the Company may include:

- names;
- contact details (including address, email address, telephone number(s) and other contact details);
- dates of birth;
- tax file numbers (TFN);
- banking details;
- copies of identification documents;
- financial records; and
- other information you provide to us.

4.1. Sensitive Information

The personal information collected by the Company may include sensitive information.

Sensitive information is defined in the Privacy Act as information or an opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

The Company will only collect sensitive information with the employee, or relevant person's consent.

We will only use sensitive information:

- for the primary purpose for which it was obtained;

- for a secondary purpose that is directly related to the primary purpose;
- with your consent; or
- where required or authorised by law.

4.2. Employee records exemption

The Company's handling, as a private sector employer, of employee records in relation to current and former employment relationships, is exempt from the APP's.

As such, this policy does not apply to the collection, holding, use or disclosure of personal information that is an employee record.

An employee record is a record of personal information relating to the employment of an employee. Examples of personal information relating to the employment of an employee include, but are not limited to:

- health information;
- information about your engagement;
- training you have received;
- the discipline you may have been subject to;
- resignation or termination of your employment; and
- terms and conditions of your employment.

The Privacy Act only applies to an employee record if the information is used for a purpose not directly related to the employment relationship.

The Company is not required to grant access to employee records under the Privacy Act. However, you may request access to your employee records.

Employee records will be kept by the Company for 7 years, as prescribed by the *Fair Work Act 2009* (Cth) and *Fair Work Regulations 2009* (Cth).

5 How does the Company collect your personal information?

The Company will collect personal information only by lawful and fair means and not in an unreasonably intrusive manner.

When you provide us with personal information you consent to our use, disclosure and handling of your personal information in accordance with this Privacy Policy and any subsequent amendments (see clause 13).

Where unsolicited information is received, the Company will determine whether this personal information could have been collected in line with the APP's. If it could have been, it will be treated normally. If not, it will be destroyed and the person

whose personal information has been destroyed will be notified of the circumstances surrounding receipt and destruction of the information.

5.1. Collecting information from you

If it is reasonable and practical to do so, the Company will collect personal information directly from you.

Depending on how you choose to interact with the Company, the Company may otherwise collect your personal information when:

- you contact, or are contacted by, the Company or its service providers;
- by telephone;
- by email;
- through the Company's website;
- from third parties;
- administrators;
- custodians;
- brokers; or
- from your legal, tax or financial advisers (where you have authorised those parties to provide this information to us); or
- when you complete a form or document and provide it to us.

5.2. Collecting information from visits to the Company's website

The Company may also collect information based on how you use its website, including through 'cookies', web beacons and other similar technologies. We may use cookies to provide you with a more consistent experience across our services.

Cookies are small text files that are transferred to your computer's hard drive through your web browser to enable the Company's systems to recognise your browser and record nonpersonal information such as the date, time or duration of your visit and the pages accessed, for website administration, statistical and maintenance purposes (Cookie Information).

No attempt is made by the Company to use Cookie Information to personally identify you. However, if Cookie Information is linked with personal information as set out above, this Cookie Information becomes personal information and will be treated in the same manner as the personal information to which it has been linked.

You can remove or reject cookies by adjusting the settings on your web browser. Please note that some parts of the Company's website may not function fully for users that disable cookies.

6 How does the Company hold your personal information?

The security of your personal information is important to the Company. Accordingly, the Company takes reasonable steps to protect your personal information from misuse, loss and unauthorised access, modification or disclosure. These steps include the implementation of the following safeguards:

- password protected databases;
- staff training;
- system firewalls; and
- internal information security policies.

The Company will take reasonable steps to permanently de-identify or responsibly destroy personal information if it is no longer needed, not contained in any Commonwealth record, and the Company is not required by law to retain the information.

6.1. Security breach procedures

The Company has adopted security practices with a view to protecting the data held us. Notwithstanding this, individuals should be aware that there are inherent risks associated with the transmission of data over the internet and other mediums. Accordingly, the Company cannot guarantee any transmission will be completely secure.

6.2. Access to your personal information

You may request to access the personal information we hold about you, and request to update or correct it, subject to certain exemptions. If you wish to access your personal information please contact us using the details at clause 12 below.

In order to protect your personal information, we may require identification from you before releasing the requested information.

7 How does the Company use your personal information?

We will hold and use your personal information so that we are able to provide you with the services that you request from us, including processing applications, managing and administering your investments.

7.1. Disclosure to third parties

We do not and will not sell, rent or trade personal information to, or with third

parties. We may however, in order to provide our services to you, on occasion be required to disclose your personal information to third parties including:

- Citco Fund Services (Australia) Pty Ltd (ACN 096 135 072);
- Polar 993 Pty Ltd (ACN 641 292 229) (AFSL 525458);
- Polar 993 Advisory Pty Ltd (ACN 649 554 932) (AFSL 531197)
- SEEK Growth Nominees Pty Ltd (ACN 651 929 725);
- our related entities; or
- third parties that perform services on behalf of the Company.

We, and third parties that we disclose your personal information to, may also on occasion be required to disclose your personal information to third parties to:

- consider any concern or complaint that you raise against the Company or to manage any legal action between you and the Company;
- prevent or investigate any actual or suspected fraud, unlawful activity or misconduct;
- determine your eligibility to invest through the Company;
- determine that you meet any legal criteria that may apply to any potential investment; or
- comply with any relevant laws, regulations, codes of practice and court orders, including the Anti-Money Laundering and Counter Terrorism Financing Act 2006 (Cth) and other applicable anti-money laundering and counter terrorism laws, regulations, rules and policies.

Before the Company discloses personal information about you to a third party, the Company will take steps as are reasonable in the circumstances to ensure that the third party does not breach the APP's in relation to the information.

7.2. Cross-border disclosure

On occasion we may transfer your personal information to an entity which is in a foreign country to assist the Company in providing its services.

In all cases when we are required to disclose your personal information to a third party we will only do so on the basis that such parties have agreed to comply with all relevant obligations relating to the use and disclosure of Personal Information as required by the Privacy Act either by being bound by obligations the equivalent of those imposed by the Privacy Act via a similar privacy regime or by us entering into binding contractual arrangements with such third parties.

7.3. Direct Marketing

We may also use or disclose your personal information to identify and promote additional products or services that we offer which may be of interest to you.

The Company will only use your personal information for the purpose of direct marketing if you have consented to the use of disclosure of information for that purpose.

You may opt out of receiving direct marketing communications by contacting sgg@seekinvestments.com

8 Third party links

The Company's website may contain certain links to other websites. The Company does not share your personal information with those websites, and it is not responsible for the privacy practices applying in respect of those websites.

9 Change of control

If the Company sells, assigns or otherwise transfers part or the whole of its business, your personal information, which was collected by the Company through your use of the service, may be among the items transferred or sold to the extent that it is relevant to the Company's business.

10 How you may access or correct your personal information

You may contact the Company to request access to the personal information it holds about you at any time. You may also ask the Company to correct information about you that you may believe is inaccurate, incomplete or out of date.

Please contact the Company using the contact details set out in clause 12. The Company will need to verify your identity before giving you access to, or correcting, your personal information. The Company will respond to the request within a reasonable period after the request is made. There is no charge to make a request, however the Company may charge a reasonable fee to cover the administrative costs of retrieving your personal information.

11 How you may complain if you have concerns about how the Company has managed your personal information

If you have a complaint related to how the Company has managed your personal information, please contact the Company using the contact details set out in clause 12. The Company may ask you to place your concerns in writing so that its compliance staff can fully understand and investigate your complaint.

The Company will provide you with an estimated response timeframe in relation to your complaint. In any event, the Company will endeavour to respond to your complaint within 30 days. If a complaint remains unresolved, you may contact the Office of the Australian Information Commissioner (OAIC) at www.oaic.gov.au to

have the complaint heard and determined.

12 How to contact us

If you have any questions about this Privacy Policy or the Company's management of your personal information, please contact the Company on:

Attention: Legal Officer

Email: sgg@seekinvestments.com

Mail: 60 Cremorne Street, Cremorne VIC 3121

13 Changes to the Company's privacy policy and information handling practices

This Privacy Policy is subject to change at any time so we encourage you to review this Privacy Policy at regular intervals. If the Company changes this Privacy Policy an updated version will be posted on the Company's website to notify you of this change. By continuing to use the Company's services after that time you will be deemed to have accepted any changes to its Privacy Policy.