



Intiger Asset Management Privacy Policy

Why does Intiger need your customer's personal information?

Except for in limited circumstances noted in this Privacy Policy, we do not engage directly with your customers or retain any of their (or your) personal information unless you explicitly instruct us, in writing, to do so.

All information we access or have sight of, has been provided either by you (our client) or by a third party authorised by you to provide us with that information.

Understanding and meeting our client's administrative services needs over the course of their business lifetime is a central part of our business.

In this Privacy Policy, personal information is any information that is provided to us from you (the client) that could identify your customers, you or be used to establish you or your customers identity.

The types of financial services we provide include:

- life insurance administrative services
- investment administrative services
- superannuation and retirement administrative income services
- administration services supporting self-managed superannuation funds
- administration services financial planning
- administration services involved in the management of investment assets such as shares, property, fixed interest and cash.

Intiger uses and discloses your and your customers' personal information so we can provide these administrative services. We may also use and disclose your & your customer's information for purposes related to those mentioned above, such as arranging for services to be provided by third parties and enhancing our customer service.

Will your customers personal information be used for Direct Marketing?

No.

Your customers' information will never be used for any form of marketing.

What happens if your customers or you do not provide information that has been requested?

It's your choice whether to provide your or your customer's information. However, if you don't, we may be unable to fulfil your request for a service.

What types of your customers' personal information does Intiger collect?

We may use a range of personal information about you or your customers to assist us in providing you with relevant services. The information we may request includes (but is not limited to) name, address, date of birth, contact details, income, assets and liabilities, account balances, tax and financial statements, employment details and citizenship status.

Does Intiger collect your customers' sensitive information?

We sometimes need to request you, or your customers provide us with sensitive information – this will only be done with your approval.

Sensitive information includes information or an opinion relating to a person's racial or ethnic origin, political views or memberships, religious beliefs or affiliations, membership of a professional or trade association or trade union, sexual orientation or practices and criminal record. It also includes information about a person's health and medical history.

The Australian Privacy Principles set out restrictions about the way sensitive information can be used. Intiger adheres to these principles.

We will only use or disclose sensitive information for the purposes for which it was provided, and for which you (or your customer) have provided express consent to.

How does Intiger collect your customers personal information?

Intiger may collect your or your customers' personal information only from sources, systems or third parties that you have approved in writing. We gather information either through applications or other forms that you provide to use and that are completed by either you or your customers, or by recording the information you provide via phone calls, interviews and other forms of communication.

With your approval, we may also collect personal information from external sources.

Examples of the people or organisations who may provide us with information are:

- employers, when a new employee joins their superannuation or insurance plan
- parents or guardians in respect of children
- people authorised by you (such as lawyers or accountants)
- other credit providers
- public sources of information (such as telephone directories)



- market research organisations (through surveys or telephone polls)
- third-party brokers (such as insurance and mortgage brokers)
- credit reporting bodies.

When we are provided with personal information about an individual from a third party, we seek to ensure the individual is aware that we hold that information. We may also provide them with your contact details if they require contact with you.

Can you or your customers remain anonymous or use a pseudonym when dealing with us?

If you or your customers wish to remain anonymous or to use a pseudonym when dealing with us, we may be restricted to only being able to provide you (and your customers) with limited information or services.

How does Intiger protect your customers' personal information?

Whether your customers' personal information is gathered through face-to-face meetings you have with them or by you or us interacting with them via telephone (with your approval), mail, internet or other methods, we take steps to store your customers information securely only in your designated systems. Your customers' personal information is never held in hard copy form of any sort (i.e. no printing, scanning, faxing etc.).

We take many exceptional steps to protect personal information from misuse, loss, unauthorised access, modification or improper disclosure. These include instructing our staff who handle personal information to respect the confidentiality of customer information and the privacy of individuals.

Below is a list of the additional steps we take to ensure the absolute security & confidentiality of both your & your customers personal information:

Additional security & compliance standards

Physical Security & Onsite Compliance/Control

- Our 2 buildings have **24/7 manned CCTV Monitoring Stations** externally & internally to all floors.
- **24/7 Security Guards** on site at all Operations Centers
- **Finger Print Recognition:** staff are fingerprinted on engagement. Access to Operational Centers is not via key but Digital Finger Print Scanning.
- **Disaster Recovery Program;** all data, all servers, all sites 24/7.
- **Australian Standard NDA (Non-disclosure Agreements)** signed by every staff member prior to engagement.
- Extensive **independent pre-employment screening** is conducted on every staff member before employment & provided to clients where required.

Notifiable data breaches

We are committed to protecting information we hold about you, and to comply with the Notifiable Data Breaches scheme.

Where we become aware of a potential data breach which is likely to result in serious harm to any individuals about whom we hold information, we will:

- investigate the suspected breach and determine scope of any breach that has occurred and the risk of harm to affected individuals whose information may have been compromised;
- notify you and the Privacy Commissioner of the potential breach; and
- take steps to minimise any harm caused to affected individuals as a result of the breach.

Who does Intiger share your customers personal information with?

From time to time we may share your or your client's personal information to the following people (but only with your knowledge):

- anyone authorised by you or to whom you have provided your consent (either expressly or impliedly), including but not limited to other financial services providers that we may need to deal with on your or your customers behalf;
- anyone to whom we are required or authorised by law to disclose your personal information (including law enforcement agencies, and national and international government and regulatory authorities including but not limited to the Australian Taxation Office, the Australian Prudential Regulation Authority, the Australian Securities and Investments Commission, the Australian Transaction Reports and Analysis Centre and the United States Internal Revenue Service); and
- any third-party contractors engaged by Intiger from time to time used exclusively for the purposes of facilitating or performing a service (or any part of a service) which we have received instructions from you to conduct.

Indirect overseas disclosure may also occur as we back up collected information on a cloud-based system provided by a third party data storage provider, as Intiger and the entities to which we disclose your personal information may, from time to time, utilise cloud-based computing services. In such cases, personal information may be disclosed to hosting entities overseas. Intiger uses all reasonable endeavours to protect Personal Information and will not disclose personal information to entities without a privacy policy meeting or exceeding the standard of stringency contained in this Privacy Policy.

Is Intiger likely to disclose personal information to third party contractors or sub-contractors?



Yes, we may engage third party contractors to carry out particular services, and such third party contractors may have access to your (or your customers') personal information.

Disclosure to third parties however is limited only to contractors used exclusively for the purposes of facilitating or performing a service (or any part of a service) which we have received instructions from you to conduct.

Generally Intiger has taken steps, and will continue to take steps, to ensure that and/or encourage any domestic third parties it has dealings with to comply with the Privacy Act and the Australian Privacy Principles when collecting, holding or using personal information provided to them by us.

How does Intiger update your customers personal information?

We realise that you and your customers' personal information changes frequently – people move house, change jobs and update other personal circumstances on an ongoing basis.

Intiger will only be privy to those changes if, during our work for you or your customers, you or your customers have provided the changes to us or we have been authorized by you or your clients to contact a third party (insurance provider) to ascertain those changes.

How can you contact Intiger about privacy?

You can contact us
to:

- seek more information about anything contained in this policy, or to request a copy of this policy in a different format
- update or correct your customers personal information

in one of the following
ways.

- By telephone: 0421 619 702
- By email: charles@intiger.com.au

- In writing:

Intiger Asset Management
283 Rokeby Road Subiaco WA 6008

How do I find out about the personal information Intiger holds about me?

Under the Privacy Act your customers have the right to access the personal information we hold about them, with some exceptions. To make a request they need to complete a form outlining what information they require. Access forms can be obtained by contacting us as set out above. We will always consult you (our client) prior to releasing any information or engaging with your client.

What should I do if I have a complaint?

To raise any concerns you might have in relation to privacy, please contact us via the contact channels listed at the start of this section.

We take privacy-related complaints very seriously and consider all complaints carefully as part of our commitment to being open, honest and fair in dealing with your concerns.

How can I escalate my concerns?

If you feel your complaint has not been satisfactorily addressed in the first instance, or that it is taking too long to resolve, you can ask for your concerns to be escalated to the Intiger Privacy Officer. Contact details are as follows:

By email: charles@intiger.com.au

In writing:

The Intiger Privacy Officer
Intiger Asset Management
283 Rokeby Road
Subiaco WA 6008

If you still have concerns further assistance may be available from:

The Financial Ombudsman Service

Phone: 1300 780 808

Website: www.fos.com.au

Email: info@fos.com.au

or

The Office of the Australian Information Commissioner

Phone: 1300 363 992

Website: www.oaic.gov.au Email:
enquiries@oaic.gov.au



About this policy

Any information we hold is governed by the most current Intiger Privacy Policy. The policy is publicly available by contacting charles@intiger.com.au and at the following link: <https://boom.intiger.com.au/Content/Documents/PrivacyPolicy.pdf> This policy is reviewed from time to time to take account of new laws and technology, and changes to our operations and practices, and to make sure it remains appropriate to the changing environment.

This policy applies to entities within the Intiger group operating in Australia & our offices in Philippines and India.