

## **Privacy Policy**

This Privacy Policy sets out the information handling policies of Boston Reed Pty Ltd (Boston Reed) and its Authorised Representatives current as at 3 September 2018.

Boston Reed recognises the importance of privacy and we are committed to ensuring the privacy of your information. This policy explains the steps we have taken to comply with the Privacy Act 1988 (Cth) and the Australian Privacy Principles.

### **Information collection**

We will only collect information that is reasonably necessary for us to perform our services. We will notify you if we intend to collect information and will only collect information with your consent. The type of information that we collect and hold about you depends on the type of product or service that we provide to you. The personal information that we hold about you may include but is not limited to:

- Name, address and contact details;
- Date of birth, age and your intended plans for retirement;
- Financial goals, needs, objectives and circumstances;
- Details of your dependents and beneficiaries;
- Financial information (for the purpose of preparing a financial plan and/or statement of advice);
- Information regarding your health (for some types of insurance);
- Your employment details (including your occupation, details of your employer, the nature of your employment and salary);
- Your tax file number (where you have given it to us);
- In some cases, insurance claim information;
- Identification documentation (which, in some cases, we are required to collect by law); and
- The products and services we provide, or have provided, to you.

We do not generally collect sensitive information about you unless required by applicable law or rules, or you have consented to it. Sensitive information includes information relating to:

- Race;
- Political or religious beliefs;
- Sexual preferences;
- Criminal convictions;
- Membership of professional or trade associations or unions; and
- Health information.

As set out above, we collect health information with your consent where it is relevant for some types of insurance.

## **Use of your Personal Information**

We use the personal information that you provide to us to assess your personal and financial circumstances and your risk tolerance so that we can formulate appropriate investment strategies and recommendations for you.

## **Disclosure of Personal Information**

We may disclose the personal information which we have about you to other organisations to assist us to implement and administer your investments, and provide you with certain products and services, including:

- Professional Advisers such as lawyers and accountants;
- Insurance companies;
- Financial institutions, including for the purpose of procuring finance for your investments where you have requested us to do so;
- Organisations offering products and services which you wish to invest in or obtain;
- Regulatory bodies if requested to do so; and
- To meet our legal obligations

We only use and disclose personal information about you for the purpose for which it was disclosed to us and for related purposes which would reasonably be necessary. For example, we may from time to time use your personal information to inform you of investment opportunities or to provide information about product and services which may be of interest to you. However, we do respect your right to ask us not to do this so please let us know if you do not want us to provide you with this additional information. We do not sell personal information to other organisations to allow them to do this. Your personal information may be disclosed to staff of our group's Vietnam Office in Ho Chi Minh City Boston Reed Pty Ltd's foreign office in Vietnam in order for us to provide our services to you.

Please note that by law, in some circumstances, we may be required to disclose your personal information to third parties without your authorisation such as to government authorities and law enforcement bodies in Australia and overseas.

## **Quality of Personal Information**

It is in our interests to ensure that the personal information that we have about you is accurate, complete and up-to-date. To assist us with this, please advise us if you believe that any of the information that we have about you is not accurate, complete or up-to-date and all reasonable efforts will be made to correct your information.

## **Personal Information Security**

We are committed to keeping your personal information secure. We will use all reasonable steps to protect the personal information which we hold from misuse and loss, and from unauthorised access, modification and disclosure.

Where the information we collect is no longer required, we will delete the information or permanently de-identify it.

## **Anonymity and pseudonymity**

Where practical and within the law, you will be given an option to not identify yourself or use a pseudonym.

### **Access to Personal Information and Correction**

Under the Australian Privacy Principles, you have a right to access the information that we hold about you, except as set out below. If you wish to access the information, please contact your representative and they will make arrangements for you to do so.

In some circumstances, we may refuse to give you access to your financial information. Those circumstances are set out in the Australian Privacy Principles and include situations where we are required to do so at law or access is likely to prejudice an enforcement body in relation to unlawful activity or seriously improper conduct. If we are entitled, under the Australian Privacy Principles, to refuse to give you access to your personal information, we will tell you and provide reasons for our decision.

If you establish that your personal information is not accurate, complete or up-to-date, we will take reasonable steps to correct that information in accordance with the Australian Privacy Principles.

### **Contact us about Privacy**

If you would like further information about how we handle your privacy or if you would like to make a complaint about how we handled your personal information, please contact:

**Boston Reed Pty Ltd**  
**Privacy Officer – Rachael Vandenberg**  
**PO BOX 422, Beaconsfield VIC 3807**  
**Phone: (03) 9707 0154**