

SMALLCO INVESTMENT MANAGER LIMITED
ACN 092 626 090

WEBSITE PRIVACY POLICY

1 December 2023



PRIVACY POLICY (“Policy”)

Smallco Investment Manager Limited (Smallco) ACN 092 626 090 is bound by the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (Privacy Act). This Privacy Policy (Policy) sets out how we collect, use and share your personal information and how to contact us with any queries or concerns.

Whilst we may update our Policy from time to time, the most recent version of this Policy will always be available on our website. If we change the Policy in any material way we will post a notice on our website along with the updated Policy. We may also contact you via your contact information on file, for example by email, notification, or some other equivalent measure.

If you have any queries, concerns or complaints about how we handle your personal information, please contact our Privacy Officer immediately.

Our website may contain links to other websites. When you click on a link to another site, you are no longer subject to this Policy.

What types of information do we collect and why?

We collect a variety of personal information from you to enable us to tailor our service to meet your needs and to meet legislative requirements. The type of information collected by us will depend on your relationship with us. We may collect personal information through a number of mechanisms, including:

- 1.1 **Collection from you:** we collect and store information you provide directly to us (*either in person, by email, by phone, or by any other direct means*) in order to deliver our services. This may include:
 - Contact information: such as your name, address, email address, telephone number;
 - Personal information: such as date of birth and driver’s licence details;
 - Financial and credit information: such as your payment information; and/or
 - Business details: such as your Australian Business Number.
- 1.2 **Device:** if you use our services or interact with us through a mobile device, we receive technical information about your device, numbers that identify the device and your location information. This information is not associated with you.
- 1.3 **Communications:** when you communicate with us, we collect information such as your contact details (such as email address or phone number).
- 1.4 **Through other sources:** where necessary, we also collect your information from publicly available records, such as those maintained by ASIC and

AUSTRAC and any other relevant entity. We may do this where it is unreasonable or impractical to collect this information from you.

We may also receive your information from third parties such from public websites, contractors, and other third parties you have authorised.

- 1.5 **Automatic:** we may use cookies or similar technologies to collect data and other services that allow us to understand how you use our online media.

This information is not linked to you personally.

You have the option of not identifying yourself or interacting with us using a pseudonym. However, this may not be practicable when engaging our services.

2. **How we use your information**

- 2.1 **Primary Purpose:** We will only use your information for the purposes for which it was collected (**primary purpose**) or a purpose related to that primary purpose if it would be reasonably expected by you or where we have separately obtained your consent.

We use personal information for the primary purpose of providing our products and services that you may request. Some examples of the purposes for which we collect, hold, use or disclose personal information includes to:

- Provide you with information you request;
- Enable us to supply you with the product, service or information requested from us;
- Personalise your experience with our products and services;
- Contact you for operational purposes;
- Comply with our obligations under any applicable laws, including ‘know your customer’ identification requirements in compliance with the *Anti-Money Laundering and Counter Terrorism Financing Act 2006*.

How we use the information we collect depends, in part, on which services you use, how you use them and any preferences you have communicated to us. If you would like to restrict how your personal information is handled beyond what is outlined in this Policy, please contact our Privacy Officer.

- 2.2 **Disclosure of personal information to third parties:** We may disclose your information to third parties who assist us in providing, managing and administering our products and services. We will also disclose your personal information where such disclosure is required by law.

We may disclose your personal information to third parties such as:

- Outsourced service providers, including software providers and professional advisors;
- Government agencies, including ASIC, AUSTRAC, OAIC or the ATO.
- Related bodies corporate; and

- Other third parties you have authorised to receive your personal information.

We do not sell or license your information to third parties.

- 2.3 **Disclosure of credit information to third parties:** We do not disclose any credit information we have about you to any credit reporting bodies.

3. **How do we store and secure the information we collect?**

We store your personal information on our electronic data base system and on computers with appropriate back up and security systems. We also may store your personal information as physical copies that have been securely archived.

3.1 **Security and management of personal information**

We will take reasonable steps to protect the personal information we hold from misuse, loss, and unauthorised access, modification or disclosure. We do this by:

- putting in place physical, electronic and procedural safeguards;
- limiting access to the information we collect about you;
- imposing confidentiality obligations on our employees;
- only providing access to personal information once proper identification has been given; and
- using technologies and processes such as network firewalls, encryption, password protected databases.

3.2 **Sending information overseas**

We do not disclose personal information overseas, unless you request or authorise us to disclose your personal information to a person of entity that is located overseas.

4. **Access and correcting personal information**

You are welcome to request details of the personal information we hold about you. To do so, contact our Privacy Officer (see below for contact details). In order to protect your personal information, we may require personal identification before providing you with details.

If you find that current personal information we hold about you is inaccurate, incomplete or out-of-date, please contact our Privacy Officer.

Complaints

If you have a complaint about the way we collect, use or disclose your personal information, please contact our Privacy Officer in the first instance. Please contact our Privacy Officer with a thorough description of your concerns and a response will be provided within a

reasonable period. All complaints must be in writing. Details of how to contact the Privacy Officer are provided below:

The Privacy Officer
Smallco Investment Manager Limited
GPO Box 4564
Sydney NSW 2001.
Phone: (02) 8256 1000
Facsimile (02) 8256 1010

When processing a complaint, we will require you to provide us with information to confirm your identity before processing a request related to information we may hold about you.

We expect our procedures will deal fairly and promptly with your complaint. However, if you remain dissatisfied, you can also contact the Office of the Australian Information Commissioner as follows:

Director of Compliance
Office of the Australian Information Commissioner
GPO Box 5218
Sydney NSW 2001

For more information on privacy see the Australian Information Commissioner's website.