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Contents

Introduction	3
What is Personal information and why do we collect it?	3
How do we collect and hold personal information?	3
Using and Disclosing your Personal Information	4
Disclosure of personal information to other parties	4
Consequences if we do not collect the personal information	5
Can you remain anonymous or use a pseudonym when dealing with us?	5
Collection of Tax File Numbers (TFNs)	5
Capacity	5
Storage of your TFN details	6
Overseas Disclosure of Personal Information	6
Protection of your personal Information	6
How to access your personal information	6
Keeping your personal information accurate and up-to-date	7
Website Privacy Policy:	7
Use of our Website and Privacy	7
Links to Third-Party Websites	7
What Are Cookies?	7
How We Use Cookies:	8
Your Consent	8
Privacy and Data Security	8
Contacting ARA about Privacy	8
Complaints	8
Change in Policy	9

Introduction

At ARA Consultants Pty Ltd ('ARA') we are committed to ensuring the confidentiality and security of your personal information. We are bound by the Privacy Act 1988 and the Australian Privacy Principles ('APPs') regulated by the Office of the Australian Information Commissioner (OAIC) to guide us in our responsible handling of personal information.

This policy applies to ARA Consultants Pty Ltd as an Australian Financial Services Licensee. It applies to personal information collected from ARA's clients for the purposes of the provision of investment, financial and superannuation advice and services.

The purpose of this document is to outline the Privacy Policy of ARA and explain how it will affect our clients. The information in this document has been prepared to outline to our clients how personal information will be used and protected.

What is Personal information and why do we collect it?

The Privacy Act and APPs apply to the collection, use and disclosure of an individual's personal information by private sector organisations.

Under the Privacy Act, personal information is broadly defined. However, in simple terms it means any information related to an individual which is held in a record by an organisation such as ARA. ARA may obtain personal information in order to provide you with our services or manage our relationship with you.

If you acquire a service from ARA, we may ask you to provide certain details including for example, your full name and contact information, marital status, gender, occupation, your date of birth, your Tax File Number (TFN) and details concerning your financial status (including details of your assets, liabilities, income and expenses). This information may be obtained from you verbally or through application forms for our products and financial questionnaires. In addition, we will use that personal information to provide you with further information about our products and services unless you advise that you do not wish to be provided with that information.

Generally, we will not need to collect personal information that is classified as sensitive information (i.e. health information, and information about personal attributes such as, ethnic or racial origin, membership of organizations such as trade unions or religious or political affiliations), there are exceptions that include if the collection is required or authorised by law, or necessary to take appropriate action in relation to suspected unlawful activity or serious misconduct. In circumstances where you are applying for certain life and life risk insurances, such as life insurance, income protection or trauma insurance, we will need to collect health and lifestyle information from you in order to satisfy the insurance underwriting process.

Unless an exception applies, we will obtain your consent before we collect any sensitive information.

There may be instances where we need to collect personal information about individuals who are not clients or prospective clients of ARA (e.g. business contact details of a company representative with whom we deal).

How do we collect and hold personal information?

We generally collect personal information directly from you. For example, when you become a client of ARA, you may complete application forms to join The ARA Investment Fund or ARA Super, or to receive financial advice from ARA Consultants Pty Ltd. In these forms there are personal details that we must collect from you in order to meet our legal obligations in providing financial services to you. We may also obtain this information verbally from you during the course of a consultation with one of our financial advisers. We may also collect your information from your representatives or professional advisers.

Prior to us providing you with a service that is designated under the Anti Money Laundering and Counter Terrorism Financing Act 2006, we will also request you provide us with a form of acceptable photographic identification. As with other personal information we collect in order to provide our service, this too will be treated as personal information and stored in the same manner.

We don't usually collect unsolicited personal information. Where we receive unsolicited personal information that is not relevant, we will destroy or de-identify that personal information as soon as practicable.

Using and Disclosing your Personal Information

ARA's policy is to use personal information for the main business purpose for which it was collected.

We may use and disclose the information we collect about you for the following purposes:
establishing your identity;

- checking whether you are eligible for our services;
- providing you with our services;
- managing our relationship with you and administering our services;
- responding or dealing with a complaint;
- providing information we believe may be relevant or of interest to you;
- direct marketing;
- data analytics and statistical analysis;
- to notify you of ARAs services, special offers or events;
- where you otherwise expressly consent to the use or disclosure;
- complying with legislative and regulatory requirements in any jurisdiction; and
- to assist ARA in the running of its business.

We may use and disclose your personal information for any of these purposes. We may also use and disclose your personal information for secondary purposes which are related to the primary purposes set out above, or in other circumstances authorised by the Privacy Act.

Some laws require or authorise our collection of your personal information including the Anti-Money Laundering and Counter-Terrorism Financing Act 2006(Cth).

Sensitive information will be used and disclosed only for the purpose for which it was provided (or a directly related secondary purpose), unless you agree otherwise, or an exemption in the Privacy Act applies.

We will retain the information we collect from you for a period of at least 7 years, as required by law.

Disclosure of personal information to other parties

Whilst our policy is to maintain the confidentiality of all personal information held by us, it may be necessary to disclose your personal information in the following circumstances:

- Where we are by law required to disclose information to law enforcement agencies, government agencies, the courts or external advisers.
- To third parties in relation to the supply of any of our services or products, where those third parties have a statutory role in the issue of those services or products.
- To third parties in cases where ARA contracts out specialised functions, e.g. organisations providing administration services, mailing services, maintaining our technology systems, printing our documents and correspondence, etc.

We will endeavour to ensure that any organisation to whom we disclose your personal information has appropriate privacy protocols in place.

ARA does not sell or rent personal information to, or trade personal information with, third parties.

For the purposes of offering our retirement and investment services, we must disclose your personal information to the external trustee and administrator of ARA Super and the external Responsible Entity and administrator of The ARA Investment Fund. They are not permitted to use this information for any other purpose than is permitted by the applicable superannuation, corporations, financial sector and taxation laws.

Consequences if we do not collect the personal information

You are entitled not to provide your personal information to us, however, in most cases this will preclude ARA from providing you with financial advice or services as we are obliged by law not to provide these services without identifying who you are or knowing your particular circumstances.

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

You have the option of not identifying yourself, or of using a pseudonym, when dealing with us on a particular matter.

As we have obligations under the Corporations Act 2001 which requires us to obtain certain information about you and your circumstances before providing personal advice and given the services we typically provide are highly personalised, it may be impracticable for us to assist you if you wish to remain anonymous or use a pseudonym.

Collection of Tax File Numbers (TFNs)

Under the TFN Guidelines an individual's TFN can only be used for the purposes of facilitating the effective administration of taxation law, certain aspects of personal assistance and superannuation law and **not** to assist in the identification of individuals for other purposes.

An individual is not legally obliged to quote their Tax File Number, however there may be financial consequences for an individual who chooses not to quote their TFN. If we request that you provide your TFN we will do it only in accordance with the authority of relevant legislation such as the Superannuation Industry (*Supervision*) Act 1993 (SIS Act) and for the purposes authorized by the relevant act such as the SIS Act.

Where we request that you provide your TFN, we are obliged to inform you either verbally or in writing:

- Of the purpose for which the TFN is requested or collected;
- The name of the law that authorise us to collect your TFN;
- That declining to quote your TFN is not an offence; and
- The consequences of declining to quote your TFN.

There are guidelines which govern the collection of TFNs. The TFN Guidelines are legally binding. A breach of the TFN Guidelines is an interference with privacy under the Privacy Act. Individuals who consider that their TFN information has been mishandled may make a complaint to the Australian Information Commissioner.

Capacity

ARA Consultants Pty Ltd , as an investment manager and financial advisory firm, is an authorised recipient of TFN information.

Storage of your TFN details

We are required to take all reasonable steps to protect Tax File Number information from misuse and from unauthorized access, modification or disclosure.

In storing your TFN information we will ensure that the records containing any TFN information is restricted to those individuals who need to handle that information for superannuation law or investment law purposes.

Where TFN information is no longer required by law to be retained or no longer necessary for a purpose under taxation law, personal assistance law or superannuation law, we will take steps to either:

- Securely destroy; or
- Permanently de-identify the TFN information.

Overseas Disclosure of Personal Information

ARA does not use the services of overseas providers nor do we provide your personal information to persons located overseas. In the event we do so in the future we will take reasonable steps to ensure the overseas recipients do not breach the applicable Australian Privacy Principles in relation to personal information.

From time to time, we may appoint a service provider that utilises services based overseas and as a result, your information may be located in countries outside of Australia.

In these circumstances, we will disclose your information in accordance with Australian laws and standards, including the Australian Privacy Principles.

Protection of your personal Information

ARA is committed to protecting your personal information from misuse and loss and from unauthorised access, modification or disclosure. ARA will primarily hold information about you electronically on secure servers located in Australia. Where information is held electronically, ARA utilises technological safeguards including passwords and multifactor authentication. ARA relies on the correctness of the information that you supply to us. Please assist ARA by contacting us if any of your personal information is incorrect, has altered or requires updating.

If you cease to be a client of ARA, we may continue to store your personal information in accordance with relevant legislative requirements. Where third party software is used by ARA (e.g. MyProsperity), we may delete your record and all associated data from the relevant platform, and you will then be able to delete your own record from the application. We may continue to hold some of the information provided via such a platform in our internal systems for the purposes of compliance with relevant laws or other reasonable business purposes, unless otherwise requested.

We will not use or disclose your personal information to another individual (i.e. accountant, family member, friend, etc.) unless you have consented to us doing so.

How to access your personal information

Under the Privacy Act you have the right to seek access to the information that we hold about you. You also have the right to request us to correct information about you which is inaccurate, incomplete or out of date.

ARA will endeavour to provide you with the access that you require as soon as possible but, in any event, normally within 21 days of receiving your request. This information will normally be provided to you in hard copy by printing off or photocopying the information from our current records.

There are circumstances where we have the right to deny access to particular information as follows:

- Where this may result in having to disclose processes that are commercially sensitive; or
- Where legal proceedings have commenced.

If it is necessary to deny you access to any of your information, we will explain to you the reason why it has been denied.

We do not usually charge you for access to your personal information. However, if the request is complex, we may charge you the marginal cost of providing the access, such as staff costs of locating and collating information or copying costs. If charges are applicable in providing access to you, we will disclose these charges to you prior to providing you with the information.

Keeping your personal information accurate and up-to-date

We are committed to ensuring that the personal information we collect, use and disclose is relevant, accurate, complete and up-to-date.

We encourage you to contact us to update any personal information we hold about you. If we correct information that has previously been disclosed to another entity, we will notify the other entity within a reasonable period of the correction. Where we are satisfied information is inaccurate, we will take reasonable steps to correct the information within 30 days, unless you agree otherwise. We do not charge you for correcting the information.

Website Privacy Policy:

Use of our Website and Privacy

The below provides important information about how we use cookies and how we may collect information when you visit our website (www.araconsultants.com.au)

Links to Third-Party Websites

Our website may contain links to third-party websites that are not operated or controlled by ARA. These third-party sites have their own privacy policies and practices, and we encourage you to review them before providing any personal information.

We are not responsible for the content, privacy practices, or the accuracy of information on third-party websites linked to or from our site. These links are provided for your convenience, and their inclusion does not imply that we endorse or are affiliated with the third-party websites.

What Are Cookies?

Cookies are small text files that are placed on your device (such as your computer or mobile phone) when you visit our website. They help us improve your experience on the website by allowing us to remember your preferences, provide personalised content, and analyse the way visitors use the website.

We use the following types of cookies on our website:

Necessary Cookies: These cookies are essential for the operation of the website and cannot be disabled in our systems. They are typically only set in response to actions you take, such as logging in or filling out forms.

Performance Cookies: These cookies collect information about how you use our website, such as which pages you visit most often. They help us improve the functionality of the website by providing insights into user behaviour. These cookies are usually anonymised.

Functionality Cookies: These cookies enable the website to remember choices you make, such as your preferred language or region, to provide a more personalised experience.

How We Use Cookies

We use cookies to:

- Improve your user experience on our website.
- Provide analytics about how our website is used.
- Remember your preferences and settings.

Your Consent

By using our website, you consent to the use of cookies as outlined in this policy. If you do not agree with our use of cookies, you can manage your cookie preferences by adjusting your browser settings. You can choose to block or delete cookies; however, please note that this may affect the functionality of certain parts of the website.

Privacy and Data Security

We take your privacy seriously. The information collected through cookies is used in accordance with our Privacy Policy. We will not use cookies to collect personally identifiable information without your consent.

Contacting ARA about Privacy

If you have any questions about ARA's privacy policy, please contact:

The Privacy Officer
ARA Consultants Pty Ltd
Level 1
17 Cotham Road
KEW VIC 3101

Phone: (03) 9853 1688

Fax: (03) 9853 1622

If you wish to make a written enquiry please write to us at:

The Privacy Officer
P O Box 3239
COTHAM VIC 3101

The Privacy Officer of ARA Consultants is the Managing Director.

Complaints

ARA is committed to resolving your privacy complaint as quickly as possible and has procedures in place to help resolve any complaints efficiently. Our aim is to assist you by reaching a satisfactory solution in the shortest possible time frame.

If you have a complaint or concern about privacy at ARA, please contact the Privacy Officer in writing. You will receive a response to your complaint within 30 days. Once you have received our response and you are not satisfied with that response, you may make your complaint to the Office of the Australian Information Commissioner

If you have a complaint in relation to the alleged mishandling of your Tax File Number, please contact the Office of the Australian Information Commissioner. You may also report lost or stolen TFNs or unauthorised access to your TFN to the Australian Taxation Office (ATO).

Office of the Australian Information Commissioner (OAIC)
GPO Box 5218
SYDNEY NSW 2001

Australian Taxation Office
GPO Box 9990
Capital city of your State/Territory

www.oaic.gov.au

Phone: 1300 363 992

Email: enquiries@oaic.gov.au

www.ato.gov.au

Change in Policy

ARA may make changes to our Privacy Policy from time to time in order to improve it or update it as ARA deems applicable or as the law may require. The updated version will be available on our website.