

Olive Financial Markets' Privacy Policy

1. About this Policy

This Privacy Policy applies to Olive Financial Markets Pty Ltd (AFSL 390 906), its related bodies corporate, and their appointed authorised representatives and financial advisers (when acting on their behalf), including Paradise Financial Group (CAR 1252614) (together and separately, "**we**", "**us**" and "**our**"). This policy explains how we handle personal information relating to individuals, whether or not they are customers, so as to ensure we meet our obligations under the Privacy Act 1988 (Cth) (**Privacy Act**).

2. Consent

By electing to acquire our services, you will be deemed to consent to us using your personal information in a manner consistent with this Privacy Policy, including (if applicable) monitoring your use of our website.

3. Types of information collected and held

We only collect personal information to the extent that this is reasonably necessary for one or more of our functions or activities. This generally does not include sensitive information, but may include the following kinds of information:

- (a) personal information that is used to identify you, such as your name, your age or date of birth, your current and past addresses and copies of your identification documents;
- (b) personal information that is used to contact you such as your mailing or street address, email address, and phone number(s);
- (c) personal and sensitive information that product issuers may require in order to deliver you their product, such as your financial information, your health or insurance related information, information about your assets and liabilities and employment information;
- (d) your Tax File Number (**TFN**);
- (e) your electronic device or connection details, such as your device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from the sites, ad data, IP address and standard web log information;
- (f) details of the products and services we have provided to you or that you have enquired about, including any additional information necessary to deliver those products and services and respond to your enquiries;

- (g) any additional information relating to you that you provide to us directly through our website or app or indirectly through your use of our website or app or online presence or through other websites or accounts from which you permit us to collect information;
- (h) information you provide to us through customer surveys; and
- (i) any other personal information that may be required to facilitate your dealings with us.

If we request your TFN, we are doing so as agent for your new superannuation scheme under the Superannuation Industry (Supervision) Act 1993. (It is not an offence to decline to provide your TFN. However, if you fail to provide your TFN to your superannuation scheme or retirement product issuer, you may become subject to a "no-TFN" tax rate on employer contributions of 31.5%, as well as the mandated 15% tax rate on superannuation.)

You also have the right to deal with us anonymously, but if so, we may be unable to provide you with products or services.

4. Method of Collection

We collect personal information about individuals directly from that individual unless it is unreasonable or impracticable for us to do so. Information will generally be collected from the following sources:

- (a) from prospective clients through our website or forms;
- (b) through correspondence, emails, meetings or when you share information with us from other services or licensees;
- (c) from third parties such as Credit Reporting Bodies (**CRBs**) or other third parties that are permitted to disclose your personal information to us.

If you provide personal information to us about someone else, you must ensure that you are entitled to disclose that information to us. You should also take reasonable steps to ensure the individual concerned is aware of how we collect, use and disclose personal information for the purposes described in this Privacy Policy.

5. Unsolicited personal information

If we collect any unsolicited personal information, we must determine whether we could have collected the information under APP 3. If not, we must promptly destroy or de-identify the information. Otherwise we may hold the information, and afford it the same protection as APP personal information.

6. Purposes of collection and holding

Purposes for which we may collect personal information (other than as required by law) include, but are not limited to:

- (a) to enable you to access and use financial products and services that we may offer or arrange;

- (b) to operate, protect, improve and optimise our website, app, business and our users' experience, such as to perform analytics, conduct research and for advertising and marketing;
- (c) to send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you;
- (d) to send you marketing and promotional messages and other information that may be of interest to you, including information sent by, or on behalf of, our business partners that we think you may find interesting;
- (e) to administer rewards, surveys, contests, or other promotional activities or events sponsored or managed by us or our business partners; and
- (f) to comply with our legal obligations, resolve any disputes that we may have with any of our users, and enforce our agreements with third parties.

7. Use and Disclosure

We only use personal information for the purposes connected with the primary purpose of collection, or a reasonably related secondary purpose which we believe you should reasonably expect. Secondary purposes might include disclosure to maintenance personnel or other third party contractors (including outsourced and cloud service providers) who may be unable to avoid accessing personal information in the course of providing technical or other support services to our company.

Examples of disclosures may include disclosures to:

- (a) our employees and related bodies corporate;
- (b) third party suppliers and service providers (including providers for the operation of our websites and/or our business or in connection with providing our products and services to you);
- (c) professional advisers, dealers and agents;
- (d) our existing or potential agents, business partners or partners;
- (e) anyone to whom our assets or businesses (or any part of them) may be, or are transferred;
- (f) specific third parties authorised by you to receive information held by us; and/or
- (g) other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

8. Direct marketing

We will not use or disclose personal information for the purposes of direct marketing to you unless:

- (a) you have consented to receive direct marketing materials; or
- (b) you would reasonably expect us to use your personal details for this purpose; or
- (c) we believe you may be interested in the material but it is impractical for us to obtain your consent.

In every instance, we will ensure that our direct marketing material incorporates an option for you to elect to receive no further such communications.

Please note also that even if you have requested not to receive further direct marketing communications, we may continue to provide you with information about changes to our terms and conditions for the supply of goods or services, questionnaires and other factual information. This form of communication is not regarded as "direct marketing" under the Privacy Act.

9. Storage of data and overseas disclosure

Typically, we will store personal information locally, and on cloud hosted applications, some of which may be located overseas or on virtually hosted clouds.

Your personal information may also be transferred overseas when the third parties with whom we may share it (as described in this policy) are located overseas. An example of such a third party is Saxo Capital Markets (Australia) Pty Ltd (ABN 32 110 128 286) (**Saxo**), which is our Clearing and Execution Broker (see Saxo's Privacy Policy at <https://www.home.saxo/en-au/legal/privacy-policy/saxo-privacy-policy>).

In addition, it is possible that we, or our subcontractors, will utilise cloud technology in connection with the storage of personal information, and it is possible that this may result in off-shore storage.

It is not practicable for us to specify in advance the location of every service provider with whom we deal. It is possible that information will be transferred to a jurisdiction where you will not be able to seek redress under the Privacy Act and that does not have an equivalent level of data protection as Australia. If you have any concerns regarding the transfer of your personal information overseas please contact us using the details provided below.

10. Employee records

In accordance with the Privacy Act, this policy does not apply to our acts and practices directly related to a current or former employment relationship between us and an employee, or to an employee record held by us relating to the employee.

11. Data Security

We take reasonable steps to protect the personal information we hold against loss, unauthorised access, use, modification or disclosure, and against other misuse.

When using our website you should be aware that no data transmission over the Internet can be guaranteed as totally secure. Although we strive to protect such information, we do not warrant the security of any information that you transmit to us over the Internet and you do so at your own risk.

When no longer required, all personal information is destroyed or de-identified in a secure manner.

12. Access and Correction

We take reasonable steps to ensure that personal information we collect is accurate, current and complete.

We will provide you with access to your personal information held by us unless we are permitted under the Privacy Act to refuse to provide you with such access. Please contact us via the details at the end of this Policy if you:

- (a) wish to have access to the personal information which we hold about you;
- (b) consider that the personal information which we hold about you is not accurate, complete or up to date; or
- (c) require further information on our personal information handling practices.

There is no set fee for requesting access to your personal information but we may require you to meet our reasonable costs in actually providing you with access. If we refuse to give you your personal information on a permitted ground, or refuse to correct your personal information, we will give you written notice with our reasons and information about how to complain.

If you consider that the information which we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, we will take reasonable steps, consistent with our obligations under the Privacy Act, to correct that information if you so request. We will respond to all requests for access and/or correction within a reasonable time.

13. Openness

From time to time, we may change our policy on how we handle personal information or the types of personal information which we hold. Any changes to our policy will be published on our website. You may obtain a free copy of our current policy from our website or by contacting us on the details below. It is your responsibility to check the website from time to time in order to determine whether there have been any changes.

14. Complaints Handling

If you have a complaint about the way in which we have handled a privacy issue, you may contact us at: smorrison@olivefinancialmarkets.com.au or via another option below.

If you are not satisfied with the process of making a complaint to our Privacy Officer you may make a complaint to the Office of the Australian Information Commissioner at:

GPO Box 5218 Sydney NSW 2001

Email: enquiries@oaic.gov.au

Telephone: 1300 363 992

You may alternatively contact our External Disputes Resolution scheme, which is the Financial Ombudsman Service Australia (**FOS**), who can be contacted at:

GPO Box 3 Melbourne Victoria 2001

Email: info@fos.org.au

Telephone: 1800 367 287

15. How to Contact Us

If you have any questions or concerns about our Privacy Policy our practices, or you require information, or wish to make a complaint, please contact us at:

Email: smorrison@olivefinancialmarkets.com.au

Address: Olive Financial Markets, Suite 1613, 87-89 Liverpool St, SYDNEY, NSW, 2000

This Privacy Policy was last updated on 01/10/2017 and is subject to change.