

Oxygen Private Clients Pty Ltd

Privacy Statement

Your rights in relation to privacy

The privacy of personal information is important to Oxygen Private Clients Pty Ltd (ABN 82 128 479 158) ("OPC, we or us"). OPC is committed to protecting the privacy of an individual's personal information. This statement sets out how OPC aims to protect the privacy of your personal information, your rights in relation to your personal information managed by us and the way OPC collects, holds, uses and discloses your personal information.

In handling your personal information, we comply with the Australian Privacy Principles set out in the Privacy Act 1988 (Cth) (Privacy Act).

What kinds of personal information does the OPC collect?

Personal information is information or an opinion about an identified, or reasonably identifiable, individual. During the provision of its services, OPC may collect your personal information.

The personal information OPC collects depends on, and is specific to, the services you engage us to provide. Generally, the kinds of personal information we collect includes:

- your name, address, telephone number, email address and date of birth;
- financial information about your assets, occupation and income, account balances, bank account details; account activities, trust arrangements, payment history and transactions with us and third parties;
- tax information including your tax file number, tax returns and related information;
- professional and business information about your membership of a professional association, partnerships, directorships, business names and trust arrangements.

In some circumstances, we may also hold other personal information provided by you.

As part of the OPC recruitment process for employees and contractors, we may collect and hold the following kinds of personal information about you: your name, contact details, date of birth, citizenship, employment references, civil, credit and criminal records, regulatory accreditation (such as RG 146 accreditation for advisers), media, directorship, property ownership and driver's licence information, education and employment history. In the employment context, we may also collect and hold your TFN, financial information and banking details.

How does OPC collect personal information?

Generally, OPC collects your personal information directly from you, through:

- completion of an application or other form either online or in hard copy;
- provision of original, or copies of, documentation whether delivered in person, by post or electronically;
- direct communication via meetings or telephone meetings and exchanges;
- email, or other electronic, correspondence or via the OPC website; or

- receipt of mail which you have directed to be sent to OPC.

There may be occasions when OPC collects your personal information from other sources such as from an information services provider, publicly maintained record or third parties such as your family members or professional advisers where we are authorised to do so. Generally, OPC will only collect your personal information from sources other than you if it is unreasonable or impracticable to collect your personal information from you.

Why does OPC need your personal information?

OPC collects, holds, uses and discloses your personal information where it is reasonably necessary for the purposes of:

- providing services to you, including providing:
 - tax, accounting and superannuation services including tax audit insurance;
 - estate and succession planning services;
 - services in accordance with any agreement you enter into with OPC;
- accounting, billing and other administrative purposes;
- identifying and informing you of services that may be of interest to you from OPC or other selected third parties; and
- any legal requirements, including OPC's obligations under:
 - applicable taxation law;
 - the Corporations Act 2001 (Cth);
 - the Australian Securities and Investments Commission Act 2001 (Cth); and
 - the Bankruptcy Act 1966 (Cth).

Tax file numbers are only collected for tax-related purposes.

Where personal information is used, or disclosed, OPC takes reasonable steps to ensure it is relevant to the purpose for which it is to be used or disclosed. You are under no obligation to provide your personal information but without certain personal information, OPC may not be able to provide the services you require.

To whom does OPC disclose your personal information?

Generally, OPC will only disclose your personal information for the purposes of providing its products and services to you. This may include disclosing your personal information to third parties where necessary to provide you with our products and services. These third parties may include government departments or other regulatory authorities and professional associations, our lawyers, your authorised investment advisors, lenders, credit providers, insurers and audit insurance providers, certain software and IT providers, third parties engaged to perform administrative tasks, professional advisers or, if authorised by you, your staff, family members, and associated entities. This disclosure is always on a confidential basis. OPC may also disclose your personal information with your consent or if disclosure is required or authorised by law.

OXYGEN

Direct marketing

OPC may use and disclose your personal information in order to inform you of products and services that may be of interest to you. In the event you do not wish to receive such communications, you can opt-out by contacting our Privacy Officer on the contact details set out below or through any opt-out mechanism contained in a marketing communication to you.

Security of your personal information

OPC regards the security of personal information as very important and has implemented a range of measures to ensure the personal information it holds is protected from misuse, interference and loss and from unauthorised access, modification or disclosure. The protection measures in place include:

- confidentiality requirements for employees;
- confidentiality statements on all outgoing correspondence including email;
- document storage security policies;
- security measures including encryption, firewalls, site monitoring and intrusion detection;
- providing a discreet environment for confidential discussions; and
- only allowing access to personal information where the individual seeking access has satisfied OPC's identification requirements.

However, OPC cannot guarantee the security of personal information provided to us electronically via the internet, email or text nor can it guarantee the safe delivery of personal information via ordinary post and as such any communication is made at your own risk. The security arrangements are reviewed and tested from time to time.

Can you access and correct the personal information that OPC holds about you?

OPC seeks to ensure personal information we hold is accurate, current, complete, relevant and not misleading. Under the Privacy Act, you have a right to access and seek correction of your personal information that we collect and hold.

If at any time you would like to access or correct the personal information OPC holds about you, or you would like more information on information security or privacy, please contact our Privacy Officer (as listed on page four of this statement). OPC will grant access to the extent required or authorised by the Privacy Act or other law and take steps reasonable in the circumstances to correct personal information where necessary and appropriate.

If OPC refuses your request to access or correct your personal information, we will provide you with written reasons for the refusal and details of complaint mechanisms. OPC will endeavor to respond to your request to access or correct your personal information within 30 days from your request.

How to contact us - further information, enquiries, or requests

For further information, enquiries or requests regarding your personal information, or if you would like to opt-out of receiving any promotional and marketing communications, please contact our OPC Privacy Officer.

Complaint handling processes

Please direct all privacy complaints to our OPC Privacy Officer.

The Privacy Officer

Oxygen Private Clients Pty Ltd

Level 1

25 Burwood Road

HAWTHORN VIC 3122

Telephone: +61 414 491 468

This privacy statement may be updated from time to time.