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## **Blue Orbit Asset Management Privacy Policy**

### **Introduction**

The Privacy Amendment (Enhancing Privacy Protection) Bill 2012, the Privacy Act 1988 (Cth), the Australian Privacy Principles (APPs) and related rules require that Blue Orbit Asset Management as an APP entity, establish and maintain an APP Privacy Policy.

We are committed to respecting the privacy of personal information of our clients and staff. This document sets out our personal information management practices. It aims to promote the protection of the privacy of individuals and to promote responsible and transparent handling of personal information held.

We may vary this policy from time to time. The latest version can be accessed on our website.

### **Consideration of personal information privacy**

We manage personal information in an open and transparent way that complies with the Australian Privacy Principles. When requested and as required by law, we will make our APP Privacy Policy available free of charge and in an appropriate form.

General enquiries about our products and services can be handled anonymously if requested. Failure to provide the personal information required by the client application process means that we cannot provide the services requested or we may be forced to withdraw our services.

### **Collection of personal information**

We only collect personal information (other than sensitive information) that is reasonably necessary and only collect such information by lawful and fair means within the requirements of the legislation.

We do not collect sensitive information about an individual unless the individual consents to the collection of the information and the information is reasonably necessary for one or more of the Company's functions or activities.

### **Dealing with personal information**

We only use personal information about an individual for the purpose for which it was collected (primary purpose) and do not use or disclose the information for another purpose (secondary purpose) without the individuals consent or unless required by law. In most circumstances, personal information is used to:

- provide financial services
- keep the individual up to date on other products or services we offer
- monitor and improve the services we provide
- process an application for employment with us
- comply with regulatory or legal requirements

We may disclose personal information to external parties including (but not limited to):

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- service providers in Australia and overseas that assist us with unit registry, audit and tax, marketing and fund-raising recruitment, payroll, superannuation, insurance, management consulting, financial and legal advisory, banking, security and technology services
  - organisations that you have consented disclosing your personal information to, including your financial advisor/planner, asset consultant, legal advisor, broker or other agents and their service providers
  - where relevant, to prospective employers and recruitment agencies who request verbal or written references in relation to current or former personnel
  - other third parties where required or authorised by law, which may include emergency situations and assisting government agencies

### **Integrity of personal information**

We take reasonable steps to ensure that the personal information that we collect is accurate, up to date, complete and protected from misuse, interference, loss, unauthorised access, modification or disclosure.

### **Access to and correction of personal information**

We provide individuals with access to the information held on them upon receipt of a written request and within the requirements of the law. We respond to a request for access to the personal information in writing within 30 days and give access to the information in the manner requested by the individual, if it is reasonable and practicable to do so.

We take reasonable steps to ensure that information held is accurate, up to date, complete, relevant and not misleading.

### **Website Users**

If you visit our website, our system may record information such as the date and time of your visit, the pages accessed and any information downloaded. We use this information for statistical, reporting and maintenance purposes only.

Whilst we take great care to protect personal information on our website, unfortunately no data transmission over the Internet can be guaranteed secure. Accordingly, we cannot ensure or warrant the security of any information you send to us or receive from us online.

The website may contain links to other sites. We are not responsible for the privacy practices or policies of those sites.

### **Further Information**

For any questions or concerns about this APP Privacy Policy, please contact our Privacy Officer:

Name: Megan Talmage

Email: [megan.talmage@blueorbitam.com](mailto:megan.talmage@blueorbitam.com)

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For information about privacy generally, or if your concerns are not resolved to your satisfaction, you can contact the Office of the Australian Information Commissioner (OAIC) on 1300 363 992 or via [www.oaic.gov.au](http://www.oaic.gov.au).