

Privacy Policy

1. Our Commitment to Privacy

- 1.1. EBC Asset Management Pty Ltd (**EBC Asset Management, we, us, or our**) is committed to protecting **your** privacy and handling your personal information responsibly and in accordance with the *Privacy Act 1988* (Cth) and the Australian Privacy Principles (**APPs**).
- 1.2. EBC Asset Management is part of the EBC Financial Group, a global financial services organisation. This Privacy Policy explains how we and other entities within the EBC Financial Group collect, use, store, disclose, and protect your personal information.
- 1.3. This Policy applies to personal information collected by EBC Asset Management in connection with our asset management and financial services activities, including through our website, applications, communications, and business relationships.

2. What Personal Information We Collect

- 2.1. Depending on the nature of your relationship with us, we may collect various categories of personal information, including:
 - (a) Identity and Contact Information;
 - (b) Financial Information;
 - (c) Professional and Employment Information;
 - (d) Transactional and Account Information;
 - (e) Technical and Usage Information;
 - (f) Account and Login Information;
 - (g) Any other information you provide to us or that we are required or authorised to collect.
- 2.2. We generally do not collect **sensitive information** unless it is reasonably necessary for our functions or activities, required or authorised by law, or you have consented to the collection.
 - (a) Sensitive information may include:
 - (b) Health information (for example, in connection with insurance products or hardship assessments)
 - (c) Biometric information (for identity verification and fraud prevention)
 - (d) Membership of professional or trade associations
 - (e) Criminal record information (where required for regulatory compliance)
- 2.3. We will only collect, use, and disclose sensitive information for the specific purpose for which it was provided, or as otherwise permitted by law.
- 2.4. If you provide us with personal information about another person (such as a joint account holder, beneficiary, or authorised representative), you must ensure that:
 - (a) You are authorised to provide that information to us; and
 - (b) You have informed them of this Privacy Policy and how we handle personal information.

3. How We Collect Personal Information

3.1. We collect personal information directly from you through:

- (a) Application forms and account opening documents;
- (b) Telephone conversations, emails, and written correspondence;
- (c) Meetings and consultations with our staff or advisers;
- (d) Our website, client portals, and mobile applications;
- (e) Surveys, feedback forms, and marketing interactions;
- (f) Identity verification and authentication processes; and
- (g) Registration and login through our Investor Login portal.

3.2. We may also collect personal information about you from third parties, including:

- (a) Financial advisers, brokers, introducers, and referral partners;
- (b) Joint account holders or authorised representatives;
- (c) Your employer or affiliated organisations;
- (d) Service providers, including identity verification services, credit reporting bodies, and data analytics providers;
- (e) Publicly available sources, including social media, company registers, and public records;
- (f) Government agencies and regulatory bodies;
- (g) Other entities within the EBC Financial Group; and
- (h) Fraud prevention and financial crime detection agencies.

3.3. When you use our website or digital services, we may automatically collect technical information such as your IP address, device type, operating system, browser type, and usage patterns through cookies and similar technologies (see Section 9 below).

4. Why We Collect and Use Your Personal Information

4.1. We collect and use your personal information for purposes including:

- (a) Product and Service Delivery;
- (b) Customer Relationship Management;
- (c) Legal and Regulatory Compliance;
- (d) Risk Management and Security; and
- (e) Business Operations and Improvement.

- 4.2. With your consent (where required by law) or where permitted, we may also use your personal information to:
- (a) Inform you about products, services, and investment opportunities offered by EBC Asset Management or the EBC Financial Group that may be of interest to you;
 - (b) Conduct market research and product development; and
 - (c) Invite you to events, seminars, and educational programs.
- 4.3. You can opt out of receiving marketing communications at any time by contacting us using the details in Section 12 or by using the unsubscribe function in our communications.
- 4.4. If you choose not to provide certain personal information, we may not be able to:
- (a) Process your application or provide you with requested products or services;
 - (b) Comply with our legal and regulatory obligations; and
 - (c) Maintain your account or continue providing services to you.
- 4.5. Where this is the case, we will inform you and work with you to find an appropriate solution where possible.

5. How We Share Your Personal Information

- 5.1. As part of the EBC Financial Group, we may share your personal information with other entities within the group for purposes including:
- (a) Providing and administering products and services across the group;
 - (b) Managing customer relationships and improving service delivery;
 - (c) Conducting data analytics, risk management, and compliance activities;
 - (d) Operating shared systems, platforms, and infrastructure; and
 - (e) Facilitating group reporting and business operations.
- 5.2. All EBC Financial Group entities are required to handle your personal information in accordance with applicable privacy laws and our internal privacy standards.
- 5.3. We may disclose your personal information to third parties in the following circumstances:
- (a) Service Providers and Business Partners;
 - (b) Financial Services Participants;
 - (c) Regulatory and Legal Disclosures;
 - (d) Business Transactions; and
 - (e) Other Parties.
- 5.4. Your personal information may be disclosed to recipients located outside Australia, including in jurisdictions where EBC Financial Group entities, service providers, or business partners operate.
- 5.5. These jurisdictions may include (but are not limited to):

- (a) **Asia-Pacific:** China, Hong Kong, Singapore, Japan, Malaysia, Thailand, Vietnam, Indonesia, Philippines, India, New Zealand.
- (b) **Europe:** United Kingdom, Ireland, Germany, France, Switzerland, Netherlands, Luxembourg.
- (c) **Americas:** United States, Canada, Cayman Islands, British Virgin Islands.
- (d) **Middle East and Africa:** United Arab Emirates, Cyprus.

5.6. When we disclose personal information overseas, we take reasonable steps to ensure that:

- (a) The recipient is subject to privacy obligations that provide substantially similar protections to the APPs; or
- (b) You have consented to the disclosure; or
- (c) The disclosure is otherwise permitted under the *Privacy Act 1988* (Cth).

5.7. Please note that overseas recipients may be required to disclose your information to government authorities or regulators in their jurisdiction in accordance with local laws.

6. How We Store and Protect Your Personal Information

6.1. We store personal information in both physical and electronic formats, including:

- (a) Secure servers and databases (which may include cloud-based storage);
- (b) Physical files and records at our offices and secure storage facilities; and
- (c) Systems operated by our service providers.

6.2. We implement appropriate technical, physical, and organisational security measures to protect your personal information from:

- (a) Unauthorised access, use, disclosure, or modification;
- (b) Loss, misuse, or destruction; and
- (c) Cyber threats, data breaches, and other security incidents.

6.3. Our security measures include:

- (a) Access controls and authentication procedures;
- (b) Encryption of data in transit and at rest;
- (c) Regular security assessments and audits;
- (d) Staff training on privacy and information security; and
- (e) Incident response and breach notification procedures.

6.4. Our Investor Login portal, including account registration, authentication, and account data storage, is provided and maintained by professional third-party technology service providers. When you create an account or log in through our Investor Login portal:

- (a) Your account details (including login credentials and related information) are collected, stored, and managed by our third-party service providers on our behalf;

- (b) These providers operate secure, industry-standard systems and infrastructure designed specifically for account management and data protection; and
 - (c) Your account information may be stored on servers located in Australia and/or overseas (see Section 5.4 for information about cross-border disclosure).
- 6.5. We require our service providers and business partners to implement appropriate security measures and to handle personal information in accordance with our instructions and applicable privacy laws.
- 6.6. We retain your personal information for as long as:
- (a) It is necessary for the purposes for which it was collected;
 - (b) Required to comply with legal, regulatory, tax, or accounting obligations; and
 - (c) Necessary to establish, exercise, or defend legal rights.
- 6.7. While we take reasonable steps to ensure our service providers protect your information, you acknowledge that the use of online services involves inherent security risks, and you should take appropriate precautions to protect your login credentials.
- 6.8. Once personal information is no longer required, we take reasonable steps to destroy or de-identify it in a secure manner.

7. Data Quality and Access

- 7.1. We take reasonable steps to ensure that the personal information we collect, use, and disclose is accurate, complete, up-to-date, and relevant.
- 7.2. You can help us maintain accurate records by providing complete and accurate information when requested and notifying us promptly of any changes to your personal details.
- 7.3. You have the right to request access to the personal information we hold about you. To make an access request, please contact us using the details in Section 12.
- 7.4. We will respond to your request within a reasonable timeframe (generally within 30 days) and provide access in a reasonable manner.
- 7.5. In some circumstances, we may be unable to provide access or may need to redact certain information, for example where:
- (a) Providing access would pose a serious threat to life, health, or safety
 - (b) Providing access would have an unreasonable impact on the privacy of others
 - (c) The request is frivolous or vexatious
 - (d) The information relates to legal proceedings or anticipated legal proceedings
 - (e) Providing access would be unlawful or would prejudice law enforcement activities
 - (f) Denying access is required or authorised by law
- 7.6. If we deny your request (in whole or in part), we will provide you with written reasons for the decision (unless it would be unreasonable to do so).
- 7.7. We may charge a reasonable fee to cover the costs of providing access, and we will inform you of any applicable fees before processing your request.

- 7.8. If you believe that personal information we hold about you is inaccurate, out-of-date, incomplete, irrelevant, or misleading, you have the right to request correction.
- 7.9. To request a correction, please contact us using the details in Section 12.
- 7.10. If we refuse to correct your information and you disagree with our decision, you may request that we associate a statement with the information noting that you believe it to be inaccurate, out-of-date, incomplete, irrelevant, or misleading.
- 7.11. Where we have disclosed incorrect information to third parties, we will take reasonable steps to notify them of the correction (if you request us to do so).

8. Marketing and Communication Preferences

- 8.1. From time to time, we may contact you with information about products, services, and investment opportunities offered by EBC Asset Management or the EBC Financial Group, market insights, research, and educational content, events, webinars, and seminars.
- 8.2. We will only send you marketing communications where you have consented to receive them or it is otherwise permitted under applicable law (such as where we have an existing relationship with you).
- 8.3. You can contact us and opt out of receiving marketing communications at any time or by updating your communication preferences; or unsubscribe from our mailing list.
- 8.4. Please note that even if you opt out of marketing communications, we will still send you important service-related communications (such as account statements, transaction confirmations, and regulatory notices).

9. Cookies and Online Tracking

- 9.1. Cookies are small text files placed on your device by websites you visit. They are widely used to make websites work more efficiently and to provide information to website owners.
- 9.2. When you visit our website, we use cookies and similar technologies (such as web beacons and pixels) to:
 - (a) Enable essential website functionality;
 - (b) Remember your preferences and settings;
 - (c) Analyse website traffic and user behaviour;
 - (d) Improve website performance and user experience; and
 - (e) Deliver relevant advertising and marketing content.
- 9.3. You can control and manage cookies through your browser settings.
- 9.4. Please note that if you disable or refuse cookies, some parts of our website may not function properly or may not be accessible.

10. Data Breach Notification

- 10.1. We have implemented processes and procedures to detect, assess, and respond to data breaches involving personal information.
- 10.2. If we experience a data breach that is likely to result in serious harm to affected individuals, we will:

- (a) Notify affected individuals as soon as practicable (and in accordance with timeframes required by law);
- (b) Notify the Office of the Australian Information Commissioner (OAIC); and
- (c) Take steps to remediate the breach and prevent future incidents.

11. Your Rights and Choices

11.1. Under the *Privacy Act 1988* (Cth) and the Australian Privacy Principles, you have the right to:

- (a) Know what personal information we hold about you;
- (b) Access your personal information (subject to certain exceptions);
- (c) Request correction of inaccurate, out-of-date, incomplete, irrelevant, or misleading information; and
- (d) Make a complaint about how we handle your personal information.

11.2. If you are located in a jurisdiction with additional privacy rights (such as the European Union, United Kingdom, or California), you may have further rights according to the relevant laws and regulations.

11.3. To exercise any of these rights, please contact us using the details in Section 12.

12. Contact Us and Making Complaints

12.1. Please contact us if you have any questions about this Privacy Policy or how we handle your personal information.

12.2. If you believe we have breached your privacy or mishandled your personal information, you can make a complaint by contact us at <https://au.ebccfd.com/contact/>.

12.3. When making a complaint, please provide:

- (a) Your contact details;
- (b) Details of the privacy concern or breach; and
- (c) Any relevant supporting documentation.

12.4. We will:

- (a) Acknowledge receipt of your complaint promptly (generally within 5 business days);
- (b) Investigate your complaint thoroughly and impartially;
- (c) Provide a written response within a reasonable timeframe (generally within 30 days);
- (d) Explain our decision and the reasons for it; and
- (e) Inform you of any remedial action we will take.

12.5. If you are not satisfied with our response, you may escalate your complaint to:

Office of the Australian Information Commissioner (OAIC)

Website: www.oaic.gov.au

Phone: 1300 363 992
Email: enquiries@oaic.gov.au

- 12.6. If your complaint relates to a financial product or service, you may also be able to lodge a complaint with the Australian Financial Complaints Authority (AFCA):

Australian Financial Complaints Authority (AFCA)

Website: www.afca.org.au
Phone: 1800 931 678
Email: info@afca.org.au

13. Changes to This Privacy Policy

- 13.1. We may update this Privacy Policy from time to time to reflect changes in our practices, technology, legal requirements, or for other operational reasons and notify you of any material changes.
- 13.2. We encourage you to review this Privacy Policy periodically to stay informed about how we protect your personal information.

14. Accessibility Support

- 14.1. We are committed to ensuring our services are accessible to all clients. If you require this Privacy Policy in an alternative format or need assistance communicating with us, please contact us using the details in Section 12.
- 14.2. If you are deaf or have hearing or speech difficulties, you can contact us through the National Relay Service (NRS):
- (a) Website: www.accesshub.gov.au
 - (b) Phone: 1800 555 660 (TTY users)
 - (c) Phone: 1800 555 727 (Speak and Listen users)