

Privacy Policy

Vanguard Solutions manages individual privacy and the security of personal information in accordance with all applicable laws and regulations, which may include the Privacy Act 1988 (Cth), Notifiable Data Breach scheme (NBD), and/or the EU's General Data Protection Regulation (GDPR).

This Privacy Policy explains how we manage your personal information, the types of personal information we collect and the reasons we collect it, how we generally use and disclose your personal information and how we store and protect it.

This Privacy Policy also explains how you can access and correct personal information that we hold about you and how you can make a complaint if you have a concern about how Vanguard Solutions has dealt with your personal information.

This policy applies to you if Vanguard Solutions currently holds, or may in the future collect, certain personal information about you.

Under the Privacy Act 1988 (Cth) [Privacy Act], 'personal information' is defined as: information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- a) whether the information or opinion is true or not; and
- b) whether the information or opinion is recorded in a material form or not.

Sensitive information includes information about racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record, or health records.

We may change this Privacy Policy at any time by publishing an updated version on our website. We encourage you to review and check our website regularly for any updates to this Privacy Policy.



Please contact us with any questions, comments or concerns about this Privacy Policy or our procedures, or if you would like a copy of this Privacy Policy.

You can contact us at:

Vanguard Solutions

Level 9, 182 St Georges Tce

Perth Western Australia 6000

Phone: +61 (0) 8 9420 5300

Email: admin@vanguardsolutions.com.au



COLLECTION OF PERSONAL INFORMATION

Vanguard Solutions only collects Personal Information that is reasonably necessary for us to perform our business functions and activities. This may be from clients, stakeholders, suppliers, service providers, partners or sponsors, third parties and through the ordinary course of business.

The types of personal information we collect about you may include:

- names, contact information such as address(es), phone number(s), fax number(s) and/or email address(es)
- information relating to our employees, contractors and prospective employees (such as contact details, date of birth, bank details, employment history, psychological testing, referees, criminal records, health checks, performance, salary, superannuation and tax file numbers and other personal information)
- financial or credit information of customers, or information contained in credit reports about customers or potential customers, obtained from credit reporting bodies
- any other personal information that is reasonably necessary to provide our services and/or conduct our functions or activities.

We may also collect personal information about you because the collection of the information is required or authorised by law or a court / tribunal order.

In certain circumstances we may be required to collect government-related identifiers (e.g. tax file number for employment). We will not use this information unless the use or disclosure is permitted under law.

Sensitive Information

Unless permitted by law, we will only collect sensitive information with your consent.

We may collect sensitive information about our employees or prospective employees for assessing their suitability for employment, as per our employment policies, or as required to provide services to our clients.



How we collect and hold personal information

We generally collect personal information about you directly from you, unless it is unreasonable or impractical to do so.

We may collect your personal information by telephone, in person, in writing, online (including through the use of cookies on our websites), or electronically by email.

You have the option to remain anonymous, or to use a pseudonym, when dealing with us, unless it is impracticable or identification is required or authorised by law or a court/tribunal order. For example, if your inquiry is general, it may not be necessary to identify yourself. If you want to obtain a service, however, identification may be necessary.

We may also collect your personal information from publicly available sources or from third parties as permitted by law.

Website privacy

When accessing Vanguard Solutions' website, we may record and log information for statistical and security purposes. This information does not include any personally identifying information but may include a user's server address and domain name, the operating system used, the date, time and duration of the visit, the pages accessed and the type of web browser used. We use this information to analyse our site's usage and performance and to refine and develop our site.

Cookies are small data files that are written to a computer's hard drive when accessing a website. Vanguard Solutions' web server may send cookies to a user's web browser in order to improve the functionality of our site. Our site uses cookies to support current activity by providing a unique identifier in order to allow the web server to distinguish the web browsers accessing our site.

We only use cookies to track the use of our website so that we can understand how users access the website. Our site does not store any personally identifying information in cookies. The cookies sent by our website expire when a session ends, and are not stored permanently on computer hard drives. Any information we collect regarding user traffic



patterns on our website is used on an anonymous basis.

It is possible for a user to adjust browser settings to allow a choice whether to accept or refuse cookies. However, if you choose to disable the receipt of cookies from our website, some aspects of the website may not be accessible.

Vanguard Solutions has no direct control over and takes no responsibility for, the content of any other internet site that is linked to our website. These links are provided for convenience only and may not remain current or be maintained. We are not responsible for the content or privacy practices associated with linked websites. It is the responsibility of the users to make their own decisions about the accuracy, currency, reliability and correctness of information contained in linked external websites.

Unsolicited personal information

If we obtain personal information about you that we did not ask for, we will check whether we could have collected that information ourselves. If we could have collected the information, we will handle it in the same way we handle other information we collect from you as set out in this Privacy Policy.

If we could not have otherwise collected the personal information, and the information is not contained in a Commonwealth record, we will destroy the information or de-identify it provided it is lawful and reasonable to do so.

WHY WE COLLECT, USE AND DISCLOSE PERSONAL INFORMATION

We may collect, hold, use and disclose your personal information for the following general purposes to enable us to conduct our business:

- to understand your requirements and supply you with goods, services or information
- to setup, administer and manage our operations and provision of services
- to develop, manage and improve of our relationship with you, your business partners or your related entities
- to improve our processes, systems, products and services
- to identify you and conduct appropriate background checks
- to undertake credit assessment activities and collect payments owed



- to assess and administer your application for employment, and manage, train and develop existing employees and representatives
- to promote and market our products and services to you with your consent and where permitted by law
- to meet our legal and regulatory obligations and comply with law enforcement activities
- and to interact with you through a sponsorship or partnership arrangement, or other agreement.

USE AND DISCLOSURE OF YOUR PERSONAL INFORMATION

We use and disclose your personal information for the purposes we collected it, unless you have consented to use or disclosure of the information for another purpose or it is otherwise required or permitted by law. For example, if you would reasonably expect us to do so, we may also use and disclose your personal information for a secondary purpose that is related to a purpose for which we collected it. In the case of sensitive information, any use or disclosure for a secondary purpose (that you would reasonably expect) will be directly related to the purpose for which we collected it.

To the extent we are permitted by law, we may disclose your personal information to third parties to enable us to conduct our business. These third parties may include:

- regulatory or government authorities
- our related bodies
- authorised representatives appointed by you
- representatives, agents or contractors we or our related bodies appoint or engage to provide services in connection with the operation of our business financial institutions
- our business partners or clients
- our professional advisers
- any other organisation or person you ask us to provide your personal information to (or collect your personal information from credit reporting bodies)

Marketing

We may use the personal information we hold about you to identify services that may be of interest to you.



We may contact you by email, text message, phone or by post to let you know about any new or existing products or services. Opt-out options are always provided, and you can contact us at any time if you no longer wish to receive marketing materials from us.

International/Cross-border Disclosure of Personal Information

Vanguard Solutions (including clients, partners or related bodies) operates and conducts business in various international locations.

We may be required to disclose personal Information to parties who are not located in Australia or an external Territory as part of our primary functions and activities. We will take such steps as are reasonable in the circumstances to ensure that such disclosure is in accordance with this policy.

How we store your personal information

We may hold your personal information in computer systems, electronic databases, digital records, telephone recordings, and in hard copy or paper files.

PROTECTING YOUR PERSONAL INFORMATION

We treat all personal information as confidential and are committed to keeping your personal information secure.

The storage mechanisms we use to hold your personal information may be managed in a number of ways. They may be managed or administered internally by us or they may be managed by a third party storage provider with whom we have a contractual relationship and be either managed locally and/or overseas.

We will take reasonable steps to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure. Ways we do this may include:

- limiting physical access to our premises
- restricting electronic and physical access to personal information we hold
- having in place stand-by systems and information backups to deal with major business



interruptions

- maintaining technology security products
- requiring any third party providers to have acceptable security measures to keep your personal information secure
- destroying or de-identifying personal information pursuant to the law and our record retention policies.
- following our Data Protection and Cyber Security Policy

Notifiable data breaches

If we become aware of a suspected personal information data breach we will conduct an appropriate assessment to determine if there is a likely risk of serious harm to any individual associated with the data breach. Where we believe there is a likely risk of serious harm, we will notify the Office of the Australian Information Commissioner and any affected individuals in accordance with our obligations under the law.

ACCESSING YOUR PERSONAL INFORMATION

You have the right to request access to personal information we hold about you. You can do so by contacting Vanguard Solutions using the contact details provided above. We will respond to a request for access within a reasonable time (usually 30 days). We may need to verify your identity before we give you access to your personal information.

We may deny your request to access to some or all of your personal information in specified circumstances, or in the manner you requested, as permitted by law. If we deny access, we will provide our reasons to you in writing (unless it would be unreasonable to do so) and the mechanisms available to complain about the refusal.

UPDATING AND CORRECTING YOUR PERSONAL INFORMATION

We will take reasonable steps to ensure that any personal information we collect, use or disclose is accurate, complete, up-to-date and relevant to our functions or activities. We rely on the accuracy of the personal information we hold about you to provide our services to you.

If you believe that personal information we hold about you is incomplete, inaccurate, out of



date, irrelevant or misleading, then you have the right to request us to correct it. You can do so by contacting Vanguard Solutions using the contact details provided above.

We may require proof of identity to confirm the authenticity of your request. If your request is accepted, we will take reasonable steps to correct that information. For example, any requests made by you to update your existing personal information because it is no longer current (for example, change of address) will be actioned promptly. You are also entitled to request us to notify a third party of the correction, if we had previously disclosed the inaccurate information to that third party. If requested, we will take reasonable steps to notify that third party of the correction, unless it is impractical or unlawful to do so.

If we do not agree that your personal information requires correction, we will provide our reasons to you in writing within a reasonable period of time. In the case of information we have obtained from a credit reporting body (or any information we have derived from it) we will explain why we believe the information is correct. If we refuse to correct your personal information you have the right to associate with the information a statement that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading. We will take reasonable steps to associate that statement with all records containing the relevant information.

RESOLVING YOUR CONCERNS

If you have a complaint about how we collect, hold, use or disclose your personal information, please contact us via the contact details set out in this Privacy Policy so that we can help.

We expect our procedures will deal fairly and promptly with your complaint. However, if you are dissatisfied, you may raise your concern with the Office of the Australian Information Commissioner (OAIC). Details on making a Privacy Complaint can be found at oaic.gov.au.