



## Privacy Policy

This privacy policy sets out the information handling policies of Oracle Capital Group Pty Ltd (Australian Financial Services License No: 521887) to ensure it abides by the National Privacy Principles established under the Privacy Amendment (Private Sector) Act, 2001. A summary of the National Privacy Principles is available by contacting our office.

At Oracle Capital, we are committed to providing professional services and respecting the privacy of your personal information.

The licensee is bound by the National Privacy Principles under the Privacy Act. This policy explains how the licensee will collect, store, verify, use and disclose the information we hold about you and the conditions under which your information may be accessed.

### Collection of personal information

Oracle Capital collects personal information that is necessary to enable us to deliver our services or products or otherwise for our primary business functions and/or activities.

In the normal course of our business we only collect information about you when you provide it to us, or it is provided to us under your authority.

We will collect personal information directly from you when you apply for a product or a service which we are obliged by to do by law prior to providing you with a product or service.

On occasions we may collect personal information about you from third parties, for example credit reporting agencies, share registries or regulatory authorities.

### What type of information does Oracle Capital hold?

The type of information we collect and hold about you varies depending on the type of product or service you require.

The personal information we hold about you may include:

- details of your current financial circumstances, including your assets and liabilities (both actual
- details of your investment preferences and aversion or tolerance to risk;

We will only collect, maintain and use your Personal Information to adequately provide the services you have requested including:

- the provision of advice to you;
- making securities recommendations;

Other purposes for which we may need to collect and use your personal information will include:

- to comply with legislative and regulatory requirements (including the AML/CTF 2006 Act);
- to enable us to perform administrative operations such as accounting, record keeping, and archival retrieval;
- to enable us to contact you when conducting marketing and inviting you to events that you may be interested in; and
- tell you about new services and/or products we can offer (unless you tell us not to contact you with this type of information.)

You may choose not to provide us with your personal information. In this case we would not be able to deal with you including providing a financial product. Under the AML/CTF laws we must be able to identify our clients and verify that identity.

#### **How does Oracle Capital use this information?**

We use this information to provide you with products or services

We may also use the information to send you material about other products or services. If you do not want to receive this type of material, tell us and we will stop.

*Our contact details are set out below:*

Oracle Capital Group Pty Ltd  
Suite 4, 6 Richardson Street  
West Perth WA 6005  
[info@oraclecapital.com.au](mailto:info@oraclecapital.com.au)  
+61 8 9385 3993

#### **Will Oracle Capital disclose your personal information?**

The licensee may share information with organisations that assist us to administer your investments or provide you with products and services including our internal and external service providers such as administrators, fund managers and insurance companies. The organisations receiving this information are not permitted to use your information for any purpose other than the specific purpose it was provided.

There are circumstances under which the licensee may disclose your personal information such as

- When the disclosure is required by law (for example, disclosed to the Australian Taxation Office, AUSTRAC or Centrelink) or
- Authorised by law (such as where disclosure is necessary in the public interest or to protect our interests).
- We use CMC Markets for our trading, clearing and settlement services and your personal information may be disclosed when we provide securities advice
- We use Complii as our client management system and Complii has the ability to accept data feeds from external sources like CMC Markets and other fund managers for ease of your portfolio management. This service requires these service providers to disclose your personal information so we can receive the data feeds.

We will also disclose your personal information if you give your consent for us to do so.

We do not sell mailing lists.

#### **How does Oracle Capital handle a request for access to personal information?**

Under the National Privacy Principles you are generally entitled to access the information we hold about you. Where you are entitled to access, the time we require to give you access will depend on the type of information requested. If we can we will answer your question immediately.

We will also try to answer you in the same way that you ask, for example, if you telephone to ask for the information we will if practicable, give you that information over the telephone. We will generally respond to a written request in writing.

Sometimes we will ask that you put your request in writing, for example, where you want copies of material or access to older information or files which are not current or it is necessary for us to retain record of your request.

We may also ask you to identify yourself to our satisfaction.

There are certain conditions under which we may refuse you access to your personal information, such as when your request may unreasonably impact upon another person's right to privacy. If we are entitled under the National Privacy Principles to refuse to give you access, we will tell you and provide reasons for our decision.

We may charge a fee for accessing your personal information.

### **Email Communication**

As electronic communication becomes more and more part of our daily business lives Oracle Capital will use your email address you have provided to contact you when necessary or to provide you with information you have requested.

We will also use your email address to alert you to marketing initiatives, newsletters, or events that may interest you.

If at any time you decide you do not wish to receive such marketing information you have the right to ask us not to send you any further such material. You may do this by advising your adviser or by sending us an email with "Unsubscribe" in the subject line.

Please allow two weeks for this instruction to take effect.

### **Website**

Oracle Capital compliance with the National Privacy principles also applies to your access to our website. Our privacy policy may be accessed from the website and other information is also posted there for your convenience.

Some areas of our website require you to be a client of the licensee and you will be issued with a user name and password which are strictly for your personal use only. The licensee will not be liable for any acts that arise from the use of your user name and password whether authorised by you or not or are a result of your failure to maintain strict security protocols over the use of your login details. Please notify the licensee immediately if you become aware of a breach of your security.

### **Collection of your personal information**

There are many aspects of the site which can be viewed without providing personal information, however, for access to future Oracle Capital customer support features you are required to submit personally identifiable information. This may include but not limited to a unique username and password, or provide sensitive information in the recovery of your lost password.

If you have objections to the Privacy Policy, you should not access or use the Site.

### **What if some of the information Oracle Capital holds is wrong?**

Please tell us. We want our records to be accurate, complete and up to date and we rely on the accuracy of the information to provide you with appropriate recommendations. Unless we disagree with you about the accuracy, currency or completeness of a record, we will generally correct it if requested, (or suggest alternative arrangements for updating our records). If we disagree with you, we will give you our reasons and record your objections on file.

### **How do I make further enquiries or complain about a breach of privacy?**

If you wish to complain about any breach or potential breach of this privacy policy or the National Privacy Principles, you should contact us and direct your complaint to the Privacy Officer. We will respond to your complaint within 7 days.

We will use our best endeavours to resolve any complaint to your satisfaction; however, if you are unhappy with our response, you are entitled to contact the Office of the Privacy Commissioner who may investigate your complaint further.

Under the mandatory reporting requirements, if there is a significant breach of your privacy data we are required to report this to the Office of the Australian Information as well as yourself.

**Changes to this Privacy Policy**

We reserve the right to review and amend this Privacy Policy from time to time.