DRUMMOND CAPITAL PARTNERS PRIVACY POLICY

PURPOSE

Drummond Capital Partners recognise that privacy is important. We are bound by and committed to supporting the Australian Privacy Policy set out in the Privacy Amendment Act.

This document outlines how Drummond Capital Partners collect, use and retain personal and sensitive information. Drummond Capital Partners holds AFSL 534213

Drummond Capital Partners obtains and retains any personal and sensitive information in accordance with the Australian Privacy Principles, which were introduced by the Privacy Amendment Act 2012 (Cth) (Privacy Amendment Act). The Privacy Amendment Act introduced significant changes to the Privacy Act 1988 (Cth) (Privacy Act).

PERSONAL & SENSITIVE INFORMATION

Drummond Capital Partners is required to collect personal information that is reasonably necessary for us to provide financial services to our clients. Information required to be collected due to the financial services provided by Drummond Capital Partners includes name, date of birth, address, income, TFN, copies of identification, trust deeds, tax returns and financials, summary of personal assets and liabilities, and other personal information. We will seek consent to the collection of this personal information when it is required.

Drummond Capital Partners largely deals with clients in financial services, it is unlikely that it would be practical for services to be provided to clients who would like to be completely anonymous, as most financial services require the individual to identify themselves. In most situations Drummond Capital Partners is required under the terms of the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) (AML/CTF Act) to appropriately identify clients.

Drummond Capital Partners must collect personal information about an individual only from the individual, unless it is unreasonable or impractical to do so, or we have consent from the client to collect from a third party on their behalf, including Accountants, Lawyers, Executors and authorised representatives. Drummond Capital Partners must only collect information by lawful and fair means.

Sensitive information should be treated with a higher level of protection than personal information. Drummond Capital Partners must not collect sensitive information about an individual unless the individual consents to the collection of information and the information is necessary for the performance of the service.

If any partners or employees collect unsolicited personal information, Drummond Capital Partners will promptly assess whether that information is necessary for the services. If deemed to be unnecessary Drummond Capital Partners will take steps to destroy or de-identify the information as soon as practicable, if it is lawful and reasonable to do so.

SECURITY OF PERSONAL INFORMATION

Drummond Capital Partners take the security of your personal information seriously and handle personal information with care to ensure that all personal data collected from our clients is secure.

Our clients' personal information is stored on password protected computers or hard drives or stored in hard copy that is kept in a secured office.

Drummond Capital Partners will destroy client personal information, when it is no longer required.

ACCESS TO YOUR INFORMATION

If you would like to get a copy of your personal information we have stored on our system, you can gain access to this information simply by requesting.

There are exceptions to the above rule, such as whether disclosing that information would post a serious threat to the individual or if giving access would be unlawful. Drummond Capital Partners is not required to give an individual access to the personal information if:

- we reasonably believe that giving access would pose a serious threat to the life, health or safety of any individual, or to the public health or public safety.
- access would have an unreasonable impact on the privacy of other individuals;
- the request for access is frivolous or vexatious;
- the information relates to existing or anticipated legal proceedings between the entity and the individual and would not be accessible by the process of discovery in those proceedings;
- giving access would be unlawful;
- denying access is required or authorised by Australian Law or a court;
- there is reason to suspect that unlawful activity or misconduct has been engaged in and giving access would prejudice taking appropriate action;
- giving access would prejudice enforcement activities by an enforcement body; or
- giving access would reveal evaluative information generated within the entity in connection with a commercially sensitive information process.

Drummond Capital Partners will respond to a request for personal information within a reasonable timeframe. If the access to information is refused, we will respond in writing outlining why access was refused and information about how you can lodge a complaint about the refusal.

CORRECTION OF PERSONAL INFORMATION

If we hold personal information that is either:

1. inaccurate, out of date, incomplete, irrelevant, misleading or
2. the individual requests Drummond Capital Partners to correct the information;

We will take reasonable steps to ensure the information we have stored is accurate, up to date, complete, relevant and not misleading. Any request to update the information should be dealt within a reasonable period.

Drummond Capital Partners will also take reasonable steps to ensure that any personal information held by third parties is also corrected.

DISCLOSURE OF PERSONAL INFORMATION

Drummond Capital Partners will generally only collect information for a primary purpose. Drummond Capital Partners will not use or disclose your information for another purpose unless:

- we seek person consent to the use or disclosure of the information; or
- one of the exceptions below applies:

An exemption applies in relation to the use or disclosure of personal information about an individual if:

- the information is required to establish or administer your account and or investment; or
- to handle any complaints; or
- the use or disclosure of the information is required or authorised by or under an Australian Law or a court/tribunal order.

If Drummond Capital Partners seeks to disclose personal information, for any other reason than the primary reason it was collected, then we will seek permission to do so.

DIRECT MARKETING

Personal information that is collected by Drummond Capital Partners will not be used for the purpose of direct marketing, unless the information has been collected for that purpose and that has been disclosed to the client.

CROSS-BORDER DISCLOSURE OF PERSONAL INFORMATION

Drummond Capital Partners may be required to disclose your personal information to service providers outside Australia. The purpose of such disclosure is to facilitate the provision of services. Drummond Capital Partners policy is to ensure that no personal information should be transferred to outside of Australia without the client's prior approval.

PRIVACY COMPLAINTS

If any individuals wish to complain about any breach or potential breach of Drummond Capital Partners Privacy Policy or our Privacy Principles, our Privacy Officer can be contacted via email enquiries@drummondcp.com, or in writing

C/- Drummond Capital Partners,
Attention: Privacy Officer
Level 16, 60 Collins Street
MELBOURNE VIC, 3000

The complaint will be acknowledged immediately or as soon as practicable and investigated and responded to within 45 days, unless an extension is required. It is our intention to use our best endeavours to resolves any complaint to an individual's satisfaction; however, if they are unhappy with our response, they are entitled to contact the Office of the Australian Information Commissioner who may investigate the complaint further.

FOR MORE INFORMATION

If you would like more information or you are uncertain about how this policy applies to a particular circumstance, please call Drummond Capital Partners on (03) 9131 8500.