

Our Privacy Policy

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HALO Technologies Pty Limited (ACN 623 830 866) (**HALO**) is a Corporate Authorised Representative (CAR: 001261916) of Amalgamated Australian Investment Solutions Pty Limited (ABN: 61 123 680 106. AFSL: 314 614) (**AAIS**). HALO and AAIS are part of the Amalgamated Australian Investment Group Limited (ABN: 81 140 208 288).

What does privacy mean for me?

Privacy is important to Us and to Our Clients. The privacy laws ensure that you understand:

- We maintain a record of your personal information:
- How we use your information: and
- To whom we may disclose your information.

In addition, it reinforces our commitment to keeping your information up to date and secure.

What types of personal information about me does HALO hold?

We collect and hold personal information about you that is both relevant and necessary for us to deliver our services and products, or otherwise for our business functions or activities. Most of this information we are required to obtain in order to satisfy Government requirements. For instance, we are required to confirm your identity for the purposes of the Anti-Money Laundering and Counter Terrorism Financing (AML/CTF) Act. Generally the types of personal information we collect include your name, date of birth, address, telephone number, email address, other contact or identification details and, in some cases, information necessary to make or receive payments to or from you or necessary to effect transactions in financial products on your behalf.

There may be occasions where we receive or need to source personal information about you from third parties such as:

- Credit reporting (for instance, when we obtain a credit report as part of our AML/CTF obligations);
- Banks (for example, opinions about your creditworthiness);
- Publicly available sources of information (e.g. financial products registries);
- Your representative or agent; or
- Government agencies.

How does HALO use my personal information?

Our primary purpose in collecting your personal information is to meet our legal obligations, complete account documentation to assist you set up the most relevant facility and understand your current investments.

At any time, we may need to appoint another financial adviser, within the Licensee, to manage your financial needs and services. You will be notified of any change to your financial adviser. Your new adviser will be provided access to your information.

We may also use your information to bring to your attention other services or products that may be of interest to you.

We may use personal information about you for the purpose of direct marketing if: we collected the information from you, you would reasonably expect us to use your information for this purpose, you have consented to the use of your information for that purpose, we provide you with the option to “opt out” or “unsubscribe”, or you have not previously requested to be “opted out” or “unsubscribed”.

How does HALO collect and hold my personal information?

We collect information about you directly from you, this can be in person, in documents you give us, from telephone calls, emails, competitions you enter, your access to our website or from transactions you make.

We may also collect your personal information from joint account holder(s) or third parties including public sources, your adviser(s), employer (or its affiliates), agents, introducers, referrers, brokers, our related companies and services providers (including credit reporting bodies and information service providers).

We take reasonable steps to protect your information from misuse, interference and loss, and from unauthorised access, modification or disclosure. We do this by securely storing information not accessible by un-authorised individuals. If we



hold your personal information and we no longer need this for any purpose for which the information may be used or disclosed by us under this policy, and the information is not contained in a Commonwealth record, and we are not required by or under an Australian law, or a court/tribunal order to retain the information, then we must take reasonable steps to destroy the information, or to ensure the information is de-identified.

If you would like to “Opt Out” of receiving updates about our products and services please email admin@asrw.com.au address with the subject “Unsubscribe” and include the following information:

Name of company you received the communication from:
Full Name:
Email address:

If you are “Opting Out” for multiple individuals, please include these details (as listed above) also.

Who does HALO disclose my personal information to?

Your information is only disclosed to other parties as are necessary for us to provide and services to you. Other parties may include internally owned companies and subsidiaries of the Amalgamated Australian Investment Group Ltd including other Licensees, related parties, accountants, trading platform providers, storage, emailing services and other service providers as appropriate.

Subject to what is permitted at law, HALO may disclose personal information to third parties:

- As required by law or regulations, such as those relating to AML/CTF or as required by a regulator;
- To our services providers, who provide services in connection with our products and services (for example, agents, contractors, insurers, auditors and external advisers we engage to carry out, or advise on, our functions and activities;
- To our affiliates; and
- As contained in the terms and conditions of any specific product or service.

In some circumstance the parties to whom we disclose personal information may operate outside of Australia or, in the case of data collected within the European Union, outside the European Union. Where this occurs, we take steps to protect personal information against misuse or loss and to comply with local law in respect of the transfer of your data from one jurisdiction to another. Those parties, in turn, may make such information available to the governments of such other countries in accordance with local law requirements.

How do I get access to the personal information HALO holds about me?

You may request access to the information we hold about you by contacting us. Upon receipt of your request we will endeavour to service your request as fully and as quickly as possible.

In some circumstances access to your information or parts thereof may not be possible. If this is the case, we will inform you as to why and, where practicable, make alternative arrangements. Depending on the requirements a fee may be charged to service requests.

What should you do if you have a complaint?

If you have any complaints about the collection and / or use of your personal information, please call 02 8356 9356 or put your query or complaint in writing and send it to:

Complaints
HALO Technologies
Level 13, 130 Pitt Street
SYDNEY NSW 2000

HALO will try to resolve your complaint quickly and fairly. If your complaint has not been resolved satisfactorily, you may escalate your complaint to the Office of the Australian Information Commissioner on 1300 363 992. The Australian Securities and Investments Commission (ASIC) may be contacted on 1300 300 630 to find out which body may be best to assist you in settling your complaint.