



Privacy Policy

Ethical Advisers Funds Management Pty Ltd

Ethical Advisers Funds Management Pty Ltd (ABN: 66 634 011 724) is a Corporate Authorised Representative (127605) of Ethical Investment Advisers Pty Ltd.

Ethical Investment Advisers (AFSL 276544) is an Australian Financial Services Licensee.

Registered Head Office: 35 Edith Terrace, Red Hill QLD 4059 ABN: 26108 175 819

Policy Document

Updated 25 September 2019

1. Ethical Advisers Funds Management Pty Ltd and Ethical Investment Advisers Pty Ltd abide by the Australian Privacy Principles established under the Privacy Act 1988 and Privacy Amendment (Privacy Enhancement) Act, 2012. A summary of the Australian Privacy Principles is available on the website of the Office of the Australian Information Commissioner, www.oaic.gov.au.
2. This policy applies to Ethical Advisers Funds Management Pty Ltd, its employees and its representatives, and Ethical Investment Advisers Pty Ltd, and its employees and its representatives.
3. We will not collect any personal information about a client except when that client has knowingly provided that information to us or authorised a third party to provide that information to us. However there may be times where we may collect information about a client from a third party and the client will not be aware of it but the information will be necessary for us to provide the required financial service.
4. A client has the right to interact anonymously or under a pseudonym. This is not practical with financial services as the services are personal and a client's must be verified before any financial transaction is implemented. If a client is making a general enquiry about a product or service though the client does not need to tell us who they are.
5. We will not use or disclose Personal Information collected by us for any purpose other than:
 - (a) The purposes for which it was provided or secondary related purposes in circumstances where the client would reasonably expect such use or disclosure; or
 - (b) Where the client has consented to such disclosure; or
 - (c) Where the Australian Privacy Principles authorise use or disclosure where required or authorised under law, in circumstances relating to public health and safety and in connection with certain operations by or on behalf of an enforcement body.
6. If one of our representatives is a member of a Professional Industry Body that Body may inspect the representative's files to assess that representative's compliance with the Rules of Professional Standards of that Body. This may involve the disclosure of your personal information. We are also obliged pursuant to the Corporations Act to maintain specified records and make those records available for inspection by the Australian Securities and Investments Commission.
7. We may use the personal information collected from a client for the purpose of providing that client with direct marketing material such as articles that may be of interest to the client, however the client may, by contacting us by phone or email or in a face to face meeting, request not to receive such information and we will give effect to that request. We will action a client's request promptly.
8. A client may at any time, by contacting us, request access to their personal information and we will reasonably provide access to that information for the client either by providing him or her with copies of the information requested, allowing him or her to inspect the information requested or providing him or her with an accurate summary of the information held.
9. We will endeavour to ensure that, at all times, the personal information about a client, which we hold is up to date and accurate. In the event that a client becomes aware, or believes, that any Personal Information which we hold about them is inaccurate, incomplete or outdated, the client may contact us by any of the methods detailed below and provide to us evidence of the inaccuracy or incompleteness or out datedness and we will, if we agree that the information requires correcting, take all reasonable steps to correct the information. We must retain historical

information to support the services we provided at a point in time.

10. If we do not agree that that client's personal information requires correcting, we must, if that client requests, take reasonable steps to ensure that whenever that client's personal information is accessed or handled in the future, it is apparent that the client is not satisfied as to the accuracy or completeness of that information.
11. We will endeavour to respond to any request for access within 14-30 days depending on the complexity of the information and/or the request. If a client's request is urgent this needs to be indicated clearly to us.

If a client wishes to complain about any breach or potential breach of this privacy policy or the Australian Privacy Principles, the client should contact us by any of the methods detailed below and request that the complaint be directed to the Compliance Manager. The complaint will be considered within 7 days and responded to. It is our intention to use our best endeavours to resolve any complaint to the client's satisfaction. However, if the client is unhappy with our response, the client is entitled to contact the Office of the Australian Information Commissioner who may investigate the complaint further.

Ethical Funds Management Pty Ltd Website

1. We understand how important it is for you to know how we deal with your personal and financial information. We only collect information that is necessary to deliver the best possible service to you and to enhance our website. We are, of course, committed to keeping that information secure. This Policy outlines how we protect your privacy and maintain confidentiality and security with regard to the information we may collect about you when using this website.
2. We will not collect any information about you except where you knowingly provide it to us through this website or as described in this document. The information we collect about you will depend on how you use the website. For example, if you visit the web site to browse or download information, our system will record the date and time of your activities, as well as the information viewed and/or downloaded.
3. If you enter information in an on-line form, the information will only be recorded if you complete the submission process; that is, if you click on the "submit" button. If you log out or leave the site without submitting the form, the information is not transmitted to our site and therefore is not recorded.
4. We may use cookies to track how you use the website – both as an anonymous visitor and when you are logged into the secure section of the web site. A "cookie" is a small text file sent by a website to your computer's hard disk to store limited, internal information so that it can be retrieved by the website later. We use cookies so that we can instantly recognise you and your preferences, allowing us to personalise the website for our visitors. Cookies are also used as part of the security mechanism for the website's secure area. If your web browser is configured to reject or block cookies, you will be unable to access the secure area.
5. We make every reasonable effort to protect and keep confidential any information provided by you. We will not use or disclose any information collected about you otherwise than for:
 - the purpose made clear to you;

- a purpose required, authorised or permitted by, or under any law, or a purpose otherwise authorised by you, or
 - a purpose you would reasonably expect.
6. The personal details we do request will not be passed on to a third party or used for purposes other than that which is stated on this website. Once we have received your information we take all reasonable steps to protect the information we hold on our system. If we no longer need your information we will generally destroy it or ensure that you cannot be identified by it. We may provide information to our associates or agents and contractors who provide services to us in connection with the provision of services that you have sought from us. We may also, unless specifically advised otherwise, contact you with further information relating to the services provided by us.
7. We maintain strict security standards and procedures with a view to preventing unauthorised access to your data, including the use of data encryption, firewalls and server authentication. If at any time you wish to know what information we hold about you please contact us at info@ethicalisma.com.au.

CONTACT DETAILS

The Privacy Officer

Address: Level 1, 1 Enoggera Terrace, Red Hill QLD 4059

Telephone: 07 3367-3332

E-mail: louise@ethicalinvestment.com.au