

Privacy Policy

Simon Christopher Russell as trustee for the BCF Consulting Services Trust, trading as Behavioural Finance Australia, its Representative and Related Entities (**We**) understand that your personal information is valuable to you. Our Privacy Policy explains how we handle your personal information and your rights of access to this information.

What is your personal information?

Your personal information is information or an opinion about you.

It is important that the information we hold about you is up to date. You must let us know when the information you have provided us has changed.

What personal information do we collect and hold?

General information

The types of information that we may collect and hold about you could include, but is not limited to:

- ID information such as your name, postal or email address, telephone numbers, and date of birth;
- psychological data such as a personality profile;
- financial information, such as your investment decisions and investments;
- other information we think is necessary to provide our services to you;
- information that the law may require us to collect from you.

What sensitive information do we collect?

We do not need to collect sensitive information about you and will not request it from you. However, some people may voluntarily provide it in the course of doing business with us. Unless required by law, we will only collect sensitive information with your consent.

What do we collect via your website activity?

You may choose to contribute to an on-line forum or blog, or complete on-line forms, surveys or personality profiles. We will collect and store this information. In some cases this information is de-identified which means that the information cannot be attributed to, or identified with, you.

To improve our services and products, we sometimes collect de-identified information from web users, our website and other websites. This information could include IP addresses or geographical information. Usually the information we collect in this way is general information only derived from cookies, such as the number of visitors to a site or statistics about how a site is browsed. We do not collect or use any information during this process that could identify you as an individual.

How do we collect your personal information?

How we collect and hold your information

We understand that your personal information needs to be looked after and isn't something you leave lying around for just anybody to take. So unless it's unreasonable or impracticable, we will try to collect personal information directly from you (referred to as 'solicited information'). For this reason, it's important that you help us to do this and keep your contact details up-to-date.

There are many ways we seek information from you. We might collect your information when you fill out a form with us, when you've given us a call, or used our website.

How we collect your information from other sources

Sometimes we collect information about you from other sources. Instances of when we may need to do this include where, at your request, we exchange information with your financial advisers, stock brokers, accountants or other representatives.

What if you don't want to provide us with your personal information?

If you don't provide your personal information to us, we may not be able to:

- provide you with the product or service you want;
- manage or administer your product or service;
- let you know about other products or services that might better meet your financial, e-commerce and lifestyle needs.

What do we do when we get information we didn't ask for?

Where you freely share information with us which we haven't sought ('**unsolicited information**'), for example, where you provide information on an on-line forum or blog, that unsolicited information will not be regarded as personal information for the purposes of this Privacy Policy.

How do we take care of your personal information?

We store information in different ways, including in paper and electronic form. The security of your personal information is important to us and we take reasonable steps to protect it from misuse, interference and loss, and from unauthorised access, modification or disclosure. Some of the ways we do this is to implement security measures for access to our systems and by only giving access to personal information to a person who is verified to be able to receive that information.

We can store personal information physically or electronically with third party data storage providers. Where we do this, we use contractual arrangements to ensure those providers take appropriate measures to protect that information and restrict the uses to which they can put that information.

How we use your personal information

We can use your information to:

- provide you with information about products and services;
- consider your request for products and services;
- provide you with products and services; and
- administer products and services which includes answering your requests and complaints;
- gain an understanding of your information communication needs, to perform research and analysis and to improve or develop our services;
- prevent or investigate any actual or suspected fraud, unlawful activity or misconduct;
- comply with relevant laws, regulations, codes of practice and external payment systems.

Can we use your information for marketing our products and services?

We may use or disclose your personal information to let you know about products and services that might better serve your needs, or running competitions or promotions and other opportunities in which you may be interested.

We may conduct these marketing activities via email, telephone, our web site, or any other electronic means. We may also market our products to you through third party channels. We will always let you know that you can opt out from receiving our marketing offers.

Where we market to prospective customers, we are happy to let them know how we obtained their information and will provide easy to follow opt-outs.

With your consent, we may disclose your personal information to third parties such as brokers or agents, or for the purpose of connecting you with other businesses or customers. You can ask us not to do this at any time. We won't sell your personal information to any organisation.

Yes, You Can Opt-Out

You can let us know at any time if you no longer wish to receive direct marketing offers. We will process your request as soon as practicable.

Who do we share your personal information with?

To make sure we can meet your specific needs and for the purposes described in 'How we use your personal information', we sometimes need to share your personal information with others. We may share your information with other organisations for any purposes for which we use your information to provide the products and services to you.

Sharing at your request

We may need to share your personal information with your representative or any person acting on your behalf (for example, financial advisers, stock brokers or accountants). When signing up to our services you provide us with the

consent to share your personal information with your representatives without the need to get your written consent.

Sharing with third parties

We may disclose your personal information to third parties, including:

- our accountants, auditors or lawyers and other external advisers;
- organisations that maintain, review and develop our business systems, procedures and technology infrastructure, including testing or upgrading our computer systems;
- our joint venture partners and other business partners and contractors that conduct business with us;
- organisations that assist with our planning, research and development;
- mailing houses and telemarketing agencies who assist us to communicate with you;
- other organisations involved in our normal business practices, including our agents and contractors; and
- where you have given your consent.

You acknowledge that not all suppliers or third parties to whom we provide your personal information under this Privacy Policy may have privacy policies equivalent to our Privacy Policy.

Sharing outside of Australia

We run our business in Australia but may use contractors and agents who are located overseas. We may need to share some of your information with organisations outside Australia. We only disclose your information to these organisations when it is necessary for the services they provide us or to provide you with our products and services.

We may store your information in a cloud or other types of networked or electronic storage. As electronic or networked storage can be accessed from various countries via an internet connection, it's not always practicable to know in which country your information may be held.

When we disclose your information overseas, we are required to take measures to ensure your information is treated in accordance with the standards that apply in Australia except in rare cases, for example, where we are required by law to disclose your information overseas, or unless where we obtain your consent not to take those measures.

Overseas organisations may be required to disclose information we share with them under a foreign law. In those instances, we will not be responsible for that disclosure.

How do you access your personal information?

How you can generally access your information

We'll always give you access to your personal information unless there are certain legal reasons why we can't. In some cases we may be able to deal with your request over the phone.

We will give you access to your information in the form you want it where it's reasonable and practical. We may charge you a small fee to cover our costs when giving you access, but we'll always check with you first.

We're not always required to give you access to your personal information. Some of the situations where we don't have to give you access include when:

- the request is frivolous;
- it would be unlawful;
- it would harm the confidentiality of our commercial information.

If we can't provide your information in the way you've requested, we will tell you why. If you have concerns, you can complain.

How do you correct your personal information?

How we correct your information

Contact us if you think there is something wrong with the information we hold about you and we'll try to correct it if it's:

- inaccurate;
- out of date;
- incomplete;
- irrelevant; or
- misleading.

If you are worried that we have given incorrect information to others, you can ask us to tell them about the correction. We'll try and help where we can - if we can't, then we'll let you know.

Helping you manage corrections

Whether we made the mistake or someone else made it, we are required to help you ask for the information to be corrected. So we can do this, we might need to talk to others. However, the most efficient way for you to make a correction request is to send it to the organisation which made the mistake.

Where we correct information

If we're able to correct the information, we'll let you know. We'll also let the relevant third parties know as well as any others you tell us about. If there are any instances where we can't do this, then we'll let you know.

Where we can't correct information

If we're unable to correct your information, we'll explain why. If you have any concerns, you can make a complaint to the Office of the Australian Information Commissioner.

Time frame for correcting information

If we agree to correct your information, we'll do so within 30 days from when you asked us, or a longer period that's been agreed by you.

If we can't make corrections within a 30 day time frame or the agreed time frame, we must:

- let you know about the delay, the reasons for it and when we expect to resolve the matter;
- ask you to agree in writing to give us more time; and
- let you know you can complain to the Office of the Australian Information Commissioner.

How do you make a complaint?

How do you generally make a complaint?

If you have a complaint about how we handle your personal information, we want to hear from you. You are always welcome to contact us.

You can contact us via www.behaviouralfinanceaustralia.com.au.

We are committed to resolving your complaint and doing the right thing by our customers.

Need more help?

If you still feel your issue hasn't been resolved to your satisfaction, then you can raise your concern with the Office of the Australian Information Commissioner:

Online: www.oaic.gov.au/privacy

Phone: 1300 363 992

Email: enquiries@oaic.gov.au

Fax: +61 2 9284 9666

Mail: GPO Box 5218 Sydney NSW 2001 or GPO Box 2999 Canberra

ACT 2601

Contact Us

We care about your privacy. Please contact us if you have any questions or comments about our privacy policies and procedures. We welcome your feedback.

You can contact us via www.behaviouralfinanceaustralia.com.au.

Changes to this Privacy Policy

This Policy may change. We will let you know of any changes to this Policy by posting a notification on our website. Any information collected after an amended privacy statement has been posted on the site, will be subject to that amended privacy statement.