



# Privacy Policy

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## 1. Introduction

Evidentia Group Holdings Pty Ltd (ABN 14 665 634 382, AFSL 546217) ('Evidentia', 'we', 'our'), and its related entities, are committed to providing our clients with the highest levels of service. This includes protecting client privacy. Evidentia is bound by the Commonwealth Privacy Act 1988 (the Privacy Act), setting out the Australian Privacy Principles ('APPs') which concern the protection of your personal information. This is outlined in our Privacy Policy below.

Evidentia's Privacy Policy sets out important information about privacy protections which we extend to the collection and management of your personal information. It does not apply to acts or practices related to the records of current or former Evidentia employees which is covered by a separate policy.

The latest version of the Privacy Policy can be found at [evidentiagroup.com](http://evidentiagroup.com).

## 2. Collection of information

### 2.1 Why do we collect your information?

Personal information is any information or opinion about an individual who is already identified or could reasonably be identified. Evidentia only collects information that is necessary to assist us in providing our services, including:

- providing advice, products and services to you
- managing and administering your products and services
- verifying your identity
- letting you know about our other products and services
- advising events, business opportunities and service provision available to clients
- providing you with news and information relevant to you
- government body and regulator reporting requirements (under taxation, personal assistance or superannuation law)

You may notify us at any time that you do not wish to receive marketing or promotional material by contacting our Privacy Officer. Even if you opt out of receiving marketing material, we may still send you essential information that we are required to send to you relating to the services we provide.

### 2.2 What information do we collect?

We do not collect personal information unless we first ask you for it, you provide it to us or authorise another party to provide it to us, or the information is publicly available. Examples of the types of information we may collect include:

- your individual and/or your entity's identity and contact information
- financial and bank details
- business information
- government issued documentation
- other information as required by taxation or other laws
- preferences and interests

Information may also, or instead, be collected by our third-party providers who operate, administrate, and promote our portfolio solutions. Each of these providers maintains their own Privacy Policy.

Generally, we will not collect sensitive personal information, such as race, religion or political beliefs). If we do seek to collect sensitive personal information, we will ask for your express consent first.

### **2.3 Our MDA service offering**

When you invest in our managed discretionary account services (MDA), through Implemented Portfolios Pty Ltd, we collect, use and disclose your personal information in order to provide our MDA services to you, including for the following purposes:

- your identification details are used to process your application, manage your investment, ensure that you receive your distributions, provide you with information about your investment from time to time, process redemptions and to ensure that we comply with our legal and regulatory obligations.
- during the time you are an investor in our managed discretionary account service we will hold investment-related information about you including the amount you have invested and your investment preferences.
- your Tax File Number and Australian Business Number (where relevant) is collected in order for us to ensure that your investment is taxed correctly.
- your identification details are used to provide you with information about any important changes to the managed discretionary account services we offer you, and related services, as well as any changes to Lonsec Group entities in general.

### **2.4 What if you do not provide the information we request?**

You are not required to give us the information we request. You may also, in some circumstances, elect to be identified by pseudonym or remain anonymous. However, if you do not give us the information that we ask you for, or wish to use a pseudonym or remain anonymous, or you provide us with incomplete or inaccurate information, this may mean that it is impractical for us to deliver our services to you.

### **2.5 How do we collect information?**

Evidentia collects information about you (individuals and entities) in a number of different ways including:

- from you, when you engage our firm so that we may provide you with one of our services
- from third parties, including service providers, other professionals, representatives or public sources
- when you attend our presentations
- when telephone, email or write to us or our service providers
- when you make contact with us to enquire about our services via a financial adviser
- when you subscribe or register to receive information or updates about our services
- when you access our website or tools

### **2.6 What about unsolicited information?**

If we receive personal information that we did not request, or you did not authorise us to receive, we must determine if this is information we could reasonably have requested from you. If it is not, then we will destroy the information or ensure it is de-identified as soon as practicable. If we are not required to destroy or de-identify the unsolicited personal information, we may retain the

personal information and deal with it according to this policy.

### **3. Disclosure of information**

#### **3.1 Who do we disclose your personal information to?**

We may provide your information to various organisations and/or parties in order to fulfil our client services and legal obligations, including, but not limited to:

- organisations involved in providing, managing or administering our products or services such as custodians, platforms, investment managers, product issuers or fund managers
- mail houses
- technology providers
- government, regulatory and other statutory bodies
- law enforcement agencies
- your professional advisers, or entities who have referred you to us
- auditors

Evidentia will not sell, exchange, trade or otherwise supply to third parties any personal information obtained from you without your prior consent.

#### **3.2 Will my information be disclosed overseas?**

We will endeavour to store any personal data in Australia, where possible. However, in certain circumstances your information may be disclosed to overseas recipients, such as third-party offshore solutions we use to provide our services to you. The most common scenario is in the use of cloud technology for transmission and/or storage of your information by us, or by contractors and consultants to us.

You should be aware that the nature of cloud technology means that your information is stored in multiple international locations, and that these countries may not have the same data security and protection requirements as Australia, however we select our service providers carefully and require strict security and confidentiality arrangements, in with the APPs.

### **4. How will we keep your personal information secure?**

Evidentia has implemented appropriate industry standard techniques, technological and organisational measures to protect against loss, misuse, unauthorised access to and/or alteration of the information under our control.

We may use a third-party service provider to provide hardware or software services that hold your personal information. Where we do so, we rely on our third-party selection processes, strict confidentiality clauses in agreements and those parties' own privacy and security measures.

We take reasonable steps to ensure that any personal information transmitted via email or our website is stored securely. Unfortunately, no data transmission over the internet can be guaranteed to be 100% secure. Whilst we strive to protect your personal information from misuse, loss and unauthorised access, we cannot guarantee the security of any information you transmit to us or receive from our online products or services. Once we receive your transmission, we make our best effort to ensure its security.

We have an obligation to report data breaches to the Office of the Australian Information

Commissioner (OAI) in certain circumstances. In the unlikely event that we have to notify the OAI we will also notify the individuals affected.

The Evidentia website, and links we provide to other websites and tools, may use “cookies”. These are small files a website can transfer to your computer hard drive for record keeping, to make websites easier to use by storing information about your preferences. Parts of our website may use cookies to store basic statistical data, to help us understand how it is used. We make no attempt to identify individual users in any way. On each use, a session cookie may be temporarily placed on your computer, during your site visit, and automatically deleted from your computer at the end of each session. Most internet browsers are pre-set to accept cookies. If you prefer not to receive them, adjust your browser to refuse cookies or to warn you when cookies are being used.

## **5. Help us to ensure we hold accurate information**

We take all reasonable precautions to ensure that the personal information we collect, use and disclose is accurate, complete and up-to-date. If you believe that the information we hold about you is inaccurate, or incomplete, please ask us to correct it.

Third-party websites that may be accessed through our site may collect personally identifiable information about you. The information practices of those websites are not covered by this policy.

## **6. How can you access the information we hold about you?**

You can request, at any time, for us to give you access to the personal information we hold about you. We are obliged to give you access within a reasonable period of making the request. The making of requests for access is at no cost to you, however, we may charge a reasonable fee to cover costs associated with providing you access. The APPs set out instances where we are not required to give you access. Where we decide that we cannot give you access, we are obliged to inform you and tell you why.

## **7. How long can we keep your personal information?**

Evidentia will retain your information in accordance with the relevant legislative requirements. When your personal information is no longer used, needed or required to be retained by Evidentia, we will destroy or permanently de-identify personal information.

## 8. Contact details and making a complaint

You can contact the Privacy Officer on the details below:

Evidentia Group Holdings Pty Ltd  
Attn: Privacy Officer  
Level 10, 1 Chifley Square  
Sydney, NSW 2000

Email: [support@evidentiagroup.com](mailto:support@evidentiagroup.com)

Ph. (02) 9164 9800

If you believe that we have mishandled your personal information and breached the Australian Privacy Principles, you may lodge a complaint with our Privacy Officer using the contact details above. We will endeavour to resolve this within 30 days. Under s36(3) of the Privacy Act, this must be in writing.

In the event we are unable to resolve your issue, you may lodge a complaint with the Information Commissioner. Office of the Australian Information Commissioner via telephone 1300 363 992 or online at [www.oaic.gov.au](http://www.oaic.gov.au) or by writing to the OAIC at GPO Box 5218 Sydney NSW 2001.