

PRIVACY POLICY

Who We Are

Your personal information has always been important to us at Adams Orbell McGrath Partners Private Wealth and Adams Orbell Pty Ltd (ABN 76 220 734 675), who are authorised representatives of Oreana Financial Services Limited and Oreana Financial Services Pty Ltd (“Oreana Financial Services”) who are diversified financial services firms with expertise in the provision of financial advice, and portfolio advisory services across Australia and Asia.

About This Policy

This policy describes how we collect, hold, use and disclose your personal information under applicable Privacy Laws. Adams Orbell McGrath Partners Private Wealth and Adams Orbell Pty Ltd are bound by the Privacy Act 1988 (Cth) (‘Privacy Act’) and we manage and protect your personal information in accordance with the Australian Privacy Principles (APPs).

Respecting Your Privacy

This notice applies to your dealings as a client with Adams Orbell McGrath Partners Private Wealth and Adams Orbell Pty Ltd. The confidentiality and privacy of your information is important to us. Depending on the type of client you are, where you reside and how we store and process your information, you may be covered by the Hong Kong Personal Data (Privacy) Ordinance and/or the Australia Privacy Act. Adams Orbell McGrath Partners Private Wealth and Adams Orbell Pty Ltd in Australia are bound by the Privacy Act 1988 (Cth) (‘Privacy Act’) and we manage and protect your personal information in accordance with the Australian Privacy Principles (APPs). If these laws do apply to you, then we comply with the relevant privacy principles those laws have established with respect to you and your personal information or personal data. We recommend you read and understand the following provisions relating to our collection, use and handling of your information.

Sensitive Information

The Privacy Act protects your sensitive information — such as information about your religion, ethnicity, health or biometrics (for example, your fingerprints). If we need this type of information, we’ll ask for your permission — except where otherwise allowed by law.

Your Personal Information

We and/or our officers, employees, contractors and agents collect, hold, use and disclose information to assist us in our relationship with you. This information is collected from you, from the transactions performed on your behalf and/or from other persons and organisation’s. If you do not provide the information we need we may not be able to provide you with the product or service you have requested. We may also be required by law to collect information from or about you for certain purposes (for example, to identify you).

The types of information collected include but are not limited to:

- information which identifies you (your name, date of birth, contact details, residence and citizenship status);
- information which relates to your financial affairs, business, employment, income or assets;



- information which arises or is required in connection with the transactions you do with us or through us;
- information which helps us to process applications made by you for particular products and services; and
- information relevant to product development or marketing.

How We Collect Your Personal Information

We collect your personal information directly from you or from third parties once authorisation has been provided by you. You have the right to refuse us authorisation to collect such information from a third party.

How We Use Your Personal Information

We collect, hold, use and disclose personal information so we can provide you with financial and credit products, advice and service relevant to your needs. We may also collect, use and disclose your information for related purposes such as:

- Complying with our legal obligations, such as verifying your identity
- Assisting with your questions and complaints
- Arranging for services to be provided by third parties
- Internal operations, such as record keeping, data analytics, auditing or training
- Promotion of other products and services that may be of interest to you

We collect, use, hold and sometimes disclose personal information about financial advisers, credit representatives and other people who we do business with (including employees) in order to administer and manage our business operations. This information is afforded the same standard of care as that of our clients.

How We Store and Secure Your Personal Information

We keep your personal information in your client files or electronically. These files are accessible to authorised personnel only and are appropriately secured and subject to confidentiality requirements. Personal information is treated as confidential information and sensitive information is treated as highly confidential. It is a legislative requirement that we keep all personal information and records for a period of 7 years.

Sending information overseas

Depending on the nature of the engagement or purpose of collection, we may disclose your personal information to other entities and suppliers overseas in accordance with the Privacy Act. These countries may include (though not limited to) Singapore, Hong Kong and the United States.

We may store, process or back-up your personal information on servers that are located overseas (including through third party service providers). In some circumstances, Oreana Financial Services Pty Ltd also uses third party service providers located overseas to carry out its functions and provide services. By submitting your personal data to us, you acknowledge and agree with your data being processed on Oreana Financial Services behalf by its suppliers. While we have made reasonable efforts to secure your information, some of our suppliers may not provide privacy protection at a level consistent with the Australian Privacy Principles.



We have taken reasonable steps to ensure that the recipient does not breach the Act and the Australian Privacy Principles.

Accessing and updating personal information

Any request to do or have done any one or more of the above things (which you may or may not be entitled to do, depending on who you are and in which jurisdiction or country you deal with us) or to raise any concern you have regarding the privacy of your Data and Account Information should be made to us in writing and addressed to the privacy officer named below.

There may be circumstances where we refuse to provide you with the information you request, for example when the information is commercially sensitive. In these situations, we will inform you and provide an explanation as to why.

We will deal with requests for access to your personal information as soon as possible and aim to respond within 10 business days. The time we require will depend on the type of information requested.

It is important that we have your contact details such as your current home and email addresses and phone number, you can update your personal information over the phone, by contacting your adviser or broker or electronically.

Your Rights

You may do the following things in respect of any of your Data and Account Information that is protected by the Hong Kong Personal Data Privacy Ordinance and the Code of Practice on Consumer Credit Data issued under that Ordinance and/or the Australia Privacy Act 1988 (Cth) ('Privacy Act'):

- check whether we hold personal data about you and the right of access (with some exceptions) to such data;
- require us to correct any personal data relating to you which you establish is inaccurate;
- ascertain our policies and practices in relation to personal data and to be informed of the kind of personal data held by us;

Important

This document provides an overview of our privacy policies and procedures (in addition to those that may apply in respect of specific Services and transactions), disclosures that we are required to make by law and a summary of certain Regulations. It is not intended to constitute legal advice in relation to your rights under any privacy legislation or any other matter.



Contact Us about Privacy

Further information about our privacy policies and procedures can be obtained from our office.

Please address to:

Risk & Compliance

Oreana Financial Services Pty Ltd

Level 7

484 St Kilda Road

Melbourne, Victoria 3004

Australia

Tel: (61) 3 9804 7113

Complaints about privacy

If you are concerned about how your personal information has been collected, used or disclosed and you wish to make a complaint. Please contact us at the details outlined above.

We will acknowledge receipt of a complaint within 1 business day. We will then investigate the complaint and respond to you within a maximum of 30 days following receipt of your initial complaint.

The Australian Financial Complaints Authority (AFCA) can consider certain privacy complaints relating to either the provision of credit or credit reporting information in general. The contact details for AFCA are:

Australian Financial Complaints Authority

Online: afca.org.au

Email: info@afca.org.au

Phone: 1800 931 678 (freecall)

Mail: Australian Financial Complaints Authority GPO Box 3 Melbourne VIC 3001

