



Argonaut Limited's Privacy Policy

This privacy policy is made on behalf of Argonaut Limited (ABN 33 109 326 418) ('Argonaut') and its related bodies corporate. Throughout this privacy policy, Argonaut Limited and its related bodies corporate will be referred to jointly as "Argonaut". This Policy outlines how Argonaut will collect and use personal information that we hold about you in accordance with the Privacy Act 1988 (Cth) ("Privacy Act").

Collection and Types of Personal Information

Argonaut is committed to protecting and maintaining the privacy, accuracy and security of the personal information we may hold about you. The personal information you provide, we collect for our use or as requested by our third party execution, clearing and settlement agents as applicable and is handled in accordance with this Privacy Policy.

We collect and hold personal information that is pertinent to the product or service that is provided to you. The types of personal information that we collect is dependent upon the nature of the account being opened. This varies for individual, company, institutional, trust or superannuation fund accounts, and so forth. The personal information that is required is inclusive of, but not limited to, personal contact details; birthdate(s); originally certified copies of identification; financial details; investor & risk profile(s); Tax File Numbers; shareholding details and bank account information. This information may be collected from you in various forms including, but not limited to, our initial account request application form, during an interview, from telephone contact or from company share registers. We do not collect information about your political beliefs, ethnic background, religious beliefs, health or sexual preference.

Your personal information will be used for establishing and maintaining your pertinent details as a client of Argonaut and for the purpose of providing our various services to you. Should you choose not to provide us with the personal information requested, we may be unable to provide some or all of the advisory or dealing services you require. Regulatory requirements oblige us to record your identity and to know your financial circumstances sufficiently to ensure personalised advice is in fact suitable for you. Consequently, you should notify us of changes to personal information we hold about you.

All investor profiles in relation to client accounts are held by Argonaut and its Clearing and Settlement Agents hold information in relation to providing the applicable service they have been contracted to provide.

In addition, the type of personal information that we collate is in accordance with the Anti-Money Laundering/Counter Terrorism Financing Act 2006.

Use and Disclosure of Your Personal Information

Argonaut is subject to the Australian Privacy Principles ("APPs"), which were incorporated into the Privacy Act and commenced on 12 March 2014. All personal information collected by Argonaut is handled in accordance with the APP's and the Privacy Act 1988. Additionally, the Personal Data Privacy Ordinance is adhered to for all personal information collected by Argonaut in Hong Kong.

Argonaut will use the personal information that we collect to provide you with the required product or service and to manage, administer and enhance the product or service provided. We will not adopt as our own any identifiers that you may provide to us such as tax file numbers, Medicare numbers, etc.

From time to time, we may communicate additional information to you such as, market updates or information about products or services deemed relevant to your financial needs. Where the information is for marketing purposes and is not relevant to your financial needs, you will be given the opportunity to elect not to receive any further such communication.

In relation to the provision of transaction services, we would usually disclose personal information about your identity and address to Argonaut's Execution, Clearing and Settlement Agents, as applicable, the Execution, Clearing and Settlement Operators and to Share Registries. In general, your personal information will only be disclosed to employees or contractors of Argonaut to facilitate matters of internal administration and operations.



We may be required to disclose your information to any court or tribunal, authority or regulatory body such as the Australian Securities Exchange (ASX), the Australian Securities & Investments Commission (ASIC), the Securities and Futures Commission (SFC), the Australian Transaction Reports and Analysis Centre (AUSTRAC), or any other governmental agency if required by law, or to a court if required by subpoena, or notice.

Additionally, disclosure may occur to operators of disputes or complaints resolutions schemes to enable compliance with relevant legislation and regulations. We may also be required to disclose your information to debt collectors, credit reporting agencies, our auditors, contractors or service providers and to other parties authorised and/or required by law to collect your information. Unless required by law or regulation, your personal information will not be passed to any third party without your consent.

If you are a company and you have provided personal information about an officer or employee of yours to us in respect of your account with us, you should show this disclosure statement to your officer or employee.

Confidentiality

The business of Argonaut, its customers and investors is strictly confidential. Information may be given to other departments within Argonaut only where permitted under the customer agreement, applicable regulation or if it is necessary for the operation of the business.

Accessing & Updating Information

We like to have all information about you that we collect, use or disclose accurate, complete and up-to-date. You may at any time request access to personal information that we hold about you. If there is an error with our information or it is incomplete, you can advise us and we will, if needed, correct, add or delete information. We may charge you the reasonable cost of processing your request. If you would like to request access to the information we hold about you, please contact our Privacy Officer.

Security & Storage

To ensure the integrity and safety of personal information, Argonaut will only disclose personal information as described in the above section, 'Use and Disclosure of Your Personal Information'. We use a range of security processes to protect the confidentiality and security of the personal information that we hold.

Argonaut takes reasonable steps to ensure the personal information we hold about you is stored securely, whether in a physical or electronic form.

Any personal information we no longer require may be destroyed or permanently de-identified. An exception to this may be where records are required to be retained by law.

Argonaut Website

This statement discloses our information gathering and dissemination practices for the Argonaut website.

When you visit the Argonaut website, our server logs the following information which is provided automatically by your browser for statistical purposes only:

- the type of browser and operating system you are using;
- your top level domain name (for example .com, .gov, .au, .uk etc.);
- the address of the referring site (for example, the previous site that you visited); and
- your server's IP address (a number which is unique to the machine through which you are connected to the internet which is usually one of your service provider's machines).
- In addition, our server logs the following information:
 - date and time of your visit; and
 - address of the pages accessed and the documents downloaded.



All of this information we use only for the purposes of statistical analysis, systems administration, monitoring of site security, customisation of the website to user needs, and evaluation, research and development. No attempt will be made to identify users or their browsing activities, except in the unlikely event of an investigation, such as where a law enforcement agency may exercise a warrant or subpoena. Information of this nature will only be disclosed to third parties if required or authorised by law. All data described in the preceding section is stored securely, and archived for a period of at least 12 months and possibly up to seven years.

We will only record your email address if you send us a message. It will only be used for the purpose for which you provide it, and will not be added to a mailing list unless you request that this be done. We will not disclose it to any other party without your consent, unless required by law.

Some pages of the Argonaut website provide the facility for users to subscribe to email mailing lists or log in to restricted access areas. To subscribe/logon to these services users must provide either a valid email address or a specific user name and password. These details will only be used for the purpose for which you have provided them and you will not be added to any other mailing lists unless you specifically request that this be done. Email mailing list addresses are stored on a separate server and can only be accessed by authorised Argonaut personnel. Your email address will not be disclosed to any other party without your consent, unless required by law

Cookies

A cookie is a small data file that a website may write to your hard drive when you visit the website. A cookie file can contain information, such as a user ID that the website uses to track the pages you have visited. The only personal information a cookie can contain is information you personally supply. A cookie cannot read data off your hard disk or read cookie files created by other websites.

The Argonaut website may use cookies to track user traffic patterns and to better serve you when you revisit the website. You can set your browser to notify you when you receive a cookie, providing you with the opportunity to either accept or reject it. You can also refuse all cookies by turning them off in your browser. By agreeing to this Privacy Policy, you accept that the Argonaut website may write cookies onto your hard disk when you access the Argonaut website.

Copyrights

Argonaut is either the owner or licensed user of the copyright in the material on this site. You may not reproduce, adapt, upload, link, frame, broadcast, distribute or in any way transmit the material on this site without the written consent of Argonaut, other than to the extent necessary to view the material or as permitted by law.

Careers/Graduate Program

Argonaut also collects personal information from people who submit applications or register interest for employment with Argonaut.

By submitting an application or registering interest for employment with Argonaut you will supply us with personal information that is subject to data protection legislation in Australia and in the country in which you are based.

Because of the nature of Argonaut's business, it is common for personal information collected by the prospective Argonaut employing entity to be disclosed to other entities within Argonaut. The purpose of that disclosure is in connection with your application for employment and for those entities to assist in providing administrative and human resources support services, risk management and for the overall management of Argonaut.

These Argonaut entities may be located in another jurisdiction and personal information may be transferred to other jurisdictions with different data protection laws. Each of the Argonaut employing entities is responsible for the shared use of personal information within Argonaut and endeavours to ensure that access to and use of the Personal Information is appropriately limited to the purpose for which it was provided to prevent its misuse or unlawful disclosure.



You should be aware that:

1. Once submitted we will use your personal information for the following purposes: (a) to assess and administer your application for employment in accordance with our standard recruitment practices, including potentially conducting psychometric testing and reference checks; (b) to communicate with you in relation to your application; and / or (c) to monitor and review our recruitment practices.
2. If your application is unsuccessful we may retain your information on file in case a more appropriate opportunity becomes available. You are free to contact us if you do not wish us to retain your information.
3. You can contact us by phone, fax, mail or email and request access to your personal information. In normal circumstances, we will give you full access to your personal information, however there may be some legal or administrative reason to deny you access - in which case we will tell you our reason.
4. You may request amendments, corrections or deletions if your personal information is inaccurate, outdated or incomplete.
5. You are not required by law to disclose your personal information to us, but we may not be able to accept or process your application for employment if you do not supply this information.

Complaints and Disputes Resolution Procedures

If you have a complaint or dispute about our treatment of your privacy, please contact our Privacy Officer.

If we do not adequately answer your concerns, you have the right to make a complaint to the Privacy Commissioner. The Privacy Commissioner can be contacted by telephone on 1300 363 992 or you can visit the Privacy Commissioner's website at <http://www.oaic.gov.au/privacy/privacy-complaints>.

Contact Details - Argonaut Privacy Officer

Privacy Officer – Argonaut
Level 30 Allendale Square, 77 St Georges Terrace, Perth, WA, 6000
GPO Box 2553, Perth, WA 6001
Email: compliance@argonaut.com
Telephone: +61 8 9224 6888
Facsimile: +61 8 9224 6899

Updates to this Privacy Policy

This Privacy Statement will be reviewed from time to time as required.

Last update: 10 March 2014

Further information on privacy in Australia may be obtained by visiting the website of the Office of Australian Information Commissioner at <http://www.oaic.gov.au/privacy>.