



## **Argonaut Limited's Privacy Policy**

This privacy policy applies to 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", "we", "our" or "us".

This Policy outlines how Argonaut will collect, hold, use and disclose personal information that we hold about you in accordance with the Australian Privacy Principles ('APPs') contained in the Privacy Act 1988 (Cth) ("Privacy Act").

The policy is effective from 22 June 2021.

### ***Commitment***

Your privacy is important to us. Argonaut is committed to the open and transparent management of the personal information we hold. We do this by protecting and maintaining the privacy, accuracy and security of the personal information we hold about you.

### ***Personal Information***

Personal information is information or opinions about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether the information is recorded in a material form or not.

### ***Sensitive Information***

Sensitive information includes, amongst other things, information about an individual's health, genetics, religious beliefs, and criminal record. In this policy, a reference to personal information includes sensitive information.

### ***Why we collect personal information***

We collect and hold personal information to establish and maintain your pertinent details as a client of Argonaut and for the primary 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.

We collect the personal information you provide, for our use or as requested by our third-party execution, clearing and settlement agents (as applicable) and is handled in accordance with this policy.

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

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.

### ***Types of personal information we collect***

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, including residential or postal addresses, email addresses and phone numbers; birthdate; originally certified copies of identification; financial details; investor & risk profile(s); Tax File Numbers; shareholding details and bank account information.

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

We do not collect information about your political beliefs, ethnic background, religious beliefs, health or sexual preference.

***Government related identifiers***

We may be required in certain circumstances to collect government identifiers such as your tax file number or Medicare number, however, we do not use or disclose this information for any purpose other than that authorised or required by law or unless you have voluntarily consented to us disclosing this information to a third party.

***How personal information is collected***

Your personal information may be collected directly from you or a person authorised by you to act as your agent. The information may be collected in various forms including, but not limited to, our initial account request application form, during an interview, from telephone contact, company share registers, or when you visit our website.

We may also receive personal information from third parties. If we do, we will store and protect it as set out in this policy. You have a right to refuse authorisation to collect information from a third party.

Argonaut also collects personal information in relation to its Careers/Graduate Program which is described in this policy.

***Use and Disclosure of Your Personal Information***

All personal information collected by Argonaut is handled in accordance with the APPs 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 for the purposes of completing transactions on your behalf. 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 resolution 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.



### ***Sending information overseas***

Argonaut may disclose personal information to Argonaut entities and third parties who assist us to manage or administer our business located outside Australia, including: Austria; Canada; Chile; China; France; Germany; Hong Kong; Indonesia; Malaysia; Netherlands; New Zealand; Portugal; Philippines; Singapore; Spain; Switzerland; Taiwan; Thailand; United Arab Emirates; United Kingdom; United States of America.

We take reasonable steps to ensure such recipients respect your privacy by abiding by equivalent privacy laws such as the EU General Data Protection Regulation and do not act in a manner which is inconsistent with the Privacy Act and the APPs.

Argonaut hosts data within Australia as a preference, but also utilises cloud-based technologies which may result in data being hosted or transmitted to overseas data centres for production usage or backup/disaster recovery. We have implemented a robust audit process and take all reasonable steps to ensure that any corporate information stored in any system, regardless of its location, is secure in compliance with Australian legislation.

### ***Your Rights under the General Data Protection Regulation (GDPR)***

If you are an individual residing in the European Economic Area (EEA), you have certain rights as to how your personal information is obtained and used. Except as otherwise provided in the GDPR, these rights include being informed of how your information is being used; having access to your personal information; being able to correct your personal information if it is inaccurate or incomplete; to delete your data subject to applicable law; to have your data processed only in accordance with applicable law; to retain and reuse your personal information for your own purposes; to object to your personal information being used; and to withdraw your consent to our processing your data at any time. Please email Argonaut's Privacy Officer to exercise those rights.

### ***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.

### ***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 in a secure manner. An exception to this may be where records are required to be retained by law.

We have an obligation to notify you and the Office of the Australian Information Commissioner (OAIC) if your personal information is involved in a data breach that is likely to result in serious harm. The notification will include recommendations about the steps you should take in response to the breach.

### ***Accessing & correcting personal information***

We endeavour to ensure that the personal information we hold about you is accurate, complete, and up to date. This includes updating your personal information when you advise us of changes. 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 whose contact details are provided within this policy.

We may charge you a fee for any of our associated costs with providing you with access to your requested information. Should this apply, you will be advised of the likely cost in advance. We will, so far as we are able, provide the requested information within 15 working days of receiving your written request.

Personal information will not be provided if, as permitted under the APPs, your request is frivolous or vexatious, giving access would be unlawful or in our reasonable opinion, to do so would result in serious threat to the life or health of any person or to public health and safety. In circumstances where we do not provide personal information or agree to requested changes, we will provide a written notification to you explaining our reasons for the decision and the procedure that you can follow to have this decision reviewed.

### ***Argonaut Website***

We do not attempt to identify visitors to our website except where you enter your details specifically to supply or obtain information or otherwise communicate with us. We use cookies to improve your experience when you visit our website. A cookie is a small text file placed on your device by a web server when you access a website which remembers user activity. Cookies identify the device, but do not identify you as an individual. You can manage or refuse the use of cookies through your browser options, but this may affect the website functionality. 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.

We use this information 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/log on to these services users must provide either a valid email address or a specific username 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.

For convenience, we sometimes provide links to other websites. When you click on a link you will leave our website and no longer be protected by this policy. These other websites are not under our control and, as such, we are not responsible for any personal information that may be collected through your use of those websites.

### ***Copyrights***

Argonaut is either the owner or licensed user of the copyright in the material on its website. 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 applying 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 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 Dispute Resolution Procedures***

If you have a complaint or dispute about our treatment of your privacy, please contact our Privacy Officer. We undertake that your complaint will be investigated diligently, and our response provided as soon as reasonably practicable.

#### ***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](mailto:compliance@argonaut.com)  
Telephone: +61 8 9224 6888  
Facsimile: +61 8 9224 6899



If you feel that we have not adequately handled your complaint, you have the right to make a complaint to the OAIC.

The OAIC can be contacted by telephone on **1300 363 992** or submitting an online enquiry form available at [oaic.gov.au/about-us/contact-us/](http://oaic.gov.au/about-us/contact-us/). You may also obtain information about the complaint process from the OAIC's website at [oaic.gov.au/privacy-complaints/](http://oaic.gov.au/privacy-complaints/) or by writing to:

Director of Compliance  
Office of the Australian Information Commissioner  
GPO Box 5218  
Sydney NSW 2001

### ***Updates to this Privacy Policy***

This policy will be reviewed from time to time as required by our business needs or legislative changes. We will notify you of such changes by posting an amended version of the policy on our website with the amendments taking effect from the date of publication on the website.

### ***Contact us***

The most current version of this policy can be obtained by contacting our Privacy Officer (their contact details are included in this policy) or by visiting our website on [argonaut.com](http://argonaut.com). If you have any questions about privacy related matters, please contact our Privacy Officer.