

HUB24 Privacy Policy

This is the Privacy Policy of HUB24 Custodial Services Ltd, known as *HUB24*. In this Privacy Policy “HUB24”, “we”, “our” and “us” have the same meaning.

Protecting your personal information is important to us. We respect your privacy and we are committed to protecting your privacy. We are bound by, and committed to supporting, the *Privacy Act 1988* (Cth) (**Privacy Act**). This Privacy Policy explains the way we collect, maintain and handle your personal information.

If you want more information about this Privacy Policy, or if you want to inquire about any of your personal information, or if you believe your personal information is inaccurate, incomplete or out-of-date, [contact us](#).

If you give us personal information about another person, you represent that you are authorised to do so and agree to inform that person who we are, that we will use and disclose that information for the relevant purposes set out below, and that they can access the information we hold about them.

Your personal information will be treated strictly in accordance with the Australian Privacy Principles contained within the *Privacy Act 1988* (Cth), as amended.

This policy outlines for our customers and prospective customers:

1. the kinds of personal information that we collect and hold;
2. how HUB24 will collect and hold such personal information;
3. the purposes for which we collect, hold, use and disclose personal information;
4. how our customers or prospective customers may access their personal information, held by HUB24;
5. how our customers or prospective customers raise a complaint about a breach of the Australian Privacy Principles, and how we will deal with such a complaint; and
6. Whether we will or is likely to disclose personal information to overseas recipients; and to which countries the information may be sent.

The information HUB24 collects

Personal information is information that can identify you. We must obtain personal information about you so we can provide the most appropriate products and services to you, provide information and marketing material to you and satisfy certain legislative and regulatory requirements.

We will only collect personal information that is necessary to provide our products and services to you, including information needed to comply with legal and regulatory requirements.

We may collect the following types of personal information:

- name;
- email address, mailing or street address and other contact details;
- date of birth;
- information to verify your identity such as your driver’s licence number;
- tax file number;
- bank account details to enable payment of distributions or redemptions;
- margin loan details relevant to your investment in our products; and
- information about other products or services of ours or any related body corporate that you may hold or use.

We are required to collect your name, address, date of birth and other verification information under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth). We are authorised to collect tax file numbers under tax laws and the Privacy Act.

Telephone recording

HUB24 or third parties providing connected services, may record telephone conversations. If HUB24 does record conversations, this will be disclosed prior to connecting to a HUB24 staff member and you will be given an opportunity to refuse such recording.

Cookies

A 'cookie' is a packet of information placed on a user's computer by a website for record keeping purposes. We may use cookies and other technologies to grant you access to certain parts of the website and to monitor traffic patterns, manage advertising and other activities.

Cookies may also be used for other purposes on the HUB24 website but in each case none of the information collected can be used to identify you personally but rather identifies your computer. You can configure your browser to notify you when you receive a cookie and this will provide you with an opportunity to either accept or reject it each time.

If you disable the use of cookies on your web browser or remove or reject specific cookies from the website or linked sites then you may not be able to gain access to all of the content and facilities within HUB24's website.

We use cookies on this website for the following purposes:

- *Analytical purposes:* Analytical cookies allow us to recognise, measure and track visitors to the website. This helps us to improve and develop the way the website works, for example, by determining whether site visitors can find information easily, or by identifying the aspects of the site that are of the most interest to them.
- *Usage preferences:* Some of the cookies on the website are activated when visitors to our sites make a choice about their usage of the site. Our website then 'remembers' the settings preferences of the user concerned. This allows us to tailor aspects of the site to the individual user.
- *Terms and conditions:* We use cookies on the website to record when a site visitor has seen a policy, such as this one, or provided consent, such as consent to the terms and conditions on our website. This helps to improve the user's experience of the site – for example, it avoids a user from repeatedly being asked to consent to the same terms.
- *Session management:* The software that runs the website uses cookies for technical purposes needed by the internal workings of our servers. For instance, we use cookies to distribute requests among multiple servers, authenticate users and determine what features of the site they can access, verify the origin of requests, keep track of information about a user's session and determine which options or pages to display in order for the site to function.
- *Functional purposes:* Functional purpose cookies store information that is needed by our applications to process and operate. For example, where transactions or requests within an application involve multiple workflow stages, cookies are used to store the information from each stage temporarily, in order to facilitate completion of the overall transaction or request.

Not Providing Your Personal Information

- If you do not give us your personal information some or all of the following may happen: we may not be able to provide you with or subsequently administer some or all our products or services; or
- we may not be able to provide you with information about our products and services.

How HUB24 will collect and hold such personal information

The main ways we may collect personal information about customers are:

1. if you subscribe to any of our information or other services;
2. if you open any form of account;
3. you open a HUB24 account through a third party, such as your financial adviser;
4. if you give information or other material to any part of HUB24; or
5. if the information is provided to us by a third party.

We maintain records of transactions and activities on accounts you may hold with us. During the course of your relationship with HUB24, we will also gather information about products and services provided to you.

The purposes for which we collect, hold, use and disclose personal information

We are required by law to collect information to identify and verify you. We therefore may make enquiries as to your identity(ies) and other personal details as required by the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006*.

Other than as required by law, we will only use your personal information for the purpose of providing you with our investment products and services. In managing your investment for you, we will use your personal information to:

- assess your application and provide our products and services to you;
- communicate with you in relation to your investment;
- monitor, audit, evaluate and otherwise administer our products and services;
- provide you with access to protected areas of our websites;
- provide continuous service to you and to conduct business processing functions including by providing personal information to our related bodies corporate, contractors, service providers or other third parties; and
- assist with the administrative, marketing (including direct marketing), planning, product or service development, quality control or the research purposes of us and our contractors and service providers.

We will only use or disclose personal information we collect about you for the purpose of which it was disclosed to us, or related purposes which would reasonably be expected, without your permission, or as permitted by the Australian Privacy Principles. We take reasonable steps to ensure that third party organisations are bound by confidentiality and privacy obligations in relation to the protection of your personal information.

We will not sell your personal information to other organisations. Nor will we provide organisations outside our group with your personal information for purposes unrelated to the management of your investment.

We may also disclose your personal information to entities located overseas for one or more of the purposes set out below. We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the Australian Privacy Principles relating to your personal information.

Personal information may be disclosed to external parties including the following:

- agents, contractors, or external service providers appointed by us (such as custodian, auditors or other professional advisers) ;
- your nominated financial adviser unless you instruct us in writing;
- your personal representative, attorney or agent – (but only with your written consent) ;
- a government or regulatory body (such as ATO, AUSTRAC, ASIC or a law enforcement agency) ;
- financial institutions and other similar organisations that we deal with in the course of our corporate activities, or those that are nominated by you;
- external service providers and professional advisers that provide services to us including electronic identification services;
- credit reporting agency, any credit provider named in the report and any credit provider whose details have been provided to us by you; and
- in order to comply with a court order or in conjunction with court proceedings.

[Contact us](#), if you have any concerns about our use of your personal information.

External Websites

Our website may contain references or links to other external websites. Those references or links may in turn refer or link to other references or links. We, our directors, officers, employees or agents are not responsible to you or any person for any breach of the Australian Privacy Principles or damage that may occur from any privacy policies or practices or content of websites to which we provide external links.

Direct marketing

We may also send you direct marketing communications and information about our products and services that we expect may be of interest to you. These communications may be sent in various forms, including mail, SMS, fax and email. You consent to us sending you those direct marketing communications by any of those methods. At any time you may opt-out of receiving marketing communications from us by contacting us (see contact details below) or by using the opt-out facilities provided in the marketing communications and we will then ensure that your name is removed from the relevant mailing list.

Please note that, if we are currently providing you with services or products, we will still need to send you essential information about your account, the relevant services or products and other information required by law.

Keeping your personal information accurate and up to date

We take all reasonable steps to ensure that all personal information we hold is as accurate as possible. You are able to contact us at any time and ask for its correction if you feel the information we have about you is inaccurate or incomplete, or to provide us with information about changes to your personal information.

Keeping your personal information secure

We invest considerable resources to keep your personal information secure from misuse, loss, interference, unauthorised access, modification or disclosure. Access to and the use of personal information is regulated to prevent misuse or unlawful disclosure of the information. We use security procedures such as encryption, firewalls, intrusion detection and anti-virus technology to prevent unauthorised access. We also use valid log-in identification and password based security to achieve electronic information security.

We retain information for so long as may be necessary to respond to issues that may arise at a later date, and longer in appropriate cases where required by law. When personal information is no longer required by us, it is destroyed or de-identified.

As our website is linked to the internet, and the internet is inherently insecure, we cannot give any assurance to any person regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

Accessing personal information held by HUB24

Under the Privacy Act, you have the right to obtain a copy of any personal information which we hold about you and to advise us of any inaccuracies.

To make a request, you will need to write to us verifying your identity and specifying what information you require. We will respond to your request within 7 days. If the information sought after is extensive we may charge a fee to cover cost.

In normal circumstances we will give you full access to your information. However, there may be times where some legal reason requires us to deny access, such as where granting access would interfere with the privacy of others or it would result in a breach of confidentiality. If access is denied we will give you written reasons for any refusal.

We aim to ensure that the personal information held about you is accurate, complete and up -to-date. You should contact us as soon as possible if any of your details change. If we do not agree that there are grounds for amendment then we will add a note to the personal information stating that you disagree with it.

How to raise a complaint about a breach of the Australian Privacy Principles, and how HUB24 will deal with such a complaint

If you believe that your privacy has been breached, please contact our Privacy Officer using the contact information below and provide details of the incident so that we can investigate it.

We request that complaints about breaches of privacy be made in writing, so we can be sure about the details of the complaint. We will attempt to confirm as appropriate and necessary with you your understanding of the conduct relevant to the complaint and what you expect as an outcome. We will inform you whether we will conduct an investigation, the name, title, and contact details of the investigating officer and the estimated completion date for the investigation process.

After we have completed our enquiries, we will contact you, usually in writing, to advise the outcome and invite a response to our conclusions about the complaint. If we receive a response from you, we will assess it and advise if we have changed our view.

The Privacy Officer
HUB24 Custodial Services Ltd
GPO Box 529
SYDNEY NSW 2001

Email: complaints@hub24.com.au
Phone: 1300 370 095

Unsubscribing

If you wish to unsubscribe from our information or registration service, contact us in writing requesting to be removed from our database. We generally do not collect sensitive information about you unless required by applicable laws or rules.

Changes to Privacy Policy

From time to time, we may change this Privacy Policy. All updates to the privacy policy will be made available to customers and prospective customers.

Contact Details

If you have any questions regarding our Privacy Policy or handling of information, please [contact us](#).

Should you wish to obtain further information about privacy you can do so by visiting the Office of the Australian Information Commissioner (**OAIC**) website at www.oaic.gov.au