

Rawlings Bolton & Co - Privacy Policy

Privacy Commitment

Thank you for reviewing our Policy. We respect the importance of your privacy and the Personal Information in our care. We have created this Policy in order to demonstrate our firm commitment to your privacy.

Rawlings Bolton & Co Pty Ltd (ACN 662 085 761) (referred to as we, our, us, RBCo) are subject to and seek to ensure that all Personal Information we collect is handled in compliance with the Australian Privacy Principles contained in the Act. RBCo is the holding company and has a controlling interest of the Licensee (Bentleys (Qld) Advisory Pty Ltd can 057 135 636). RBCo maintains policies and procedures to ensure Licensee's obligations under its Australian Financial Services License. This Policy sets out how we collect, hold, Use and Disclose information (including Personal Information) that we obtain from you. This Policy also includes our Credit Reporting Policy which sets out how we collect, hold, Use and Disclose Credit Information to comply with our credit reporting obligations under the Act and the Credit Reporting Code registered under section 26S(1) of the Act (Code).

What kind of personal information do we collect and hold?

We may collect and hold a range of Personal Information, and in some cases Sensitive Information about you to provide you with our services.

Investors and custodial Clients

In operating our financial services business (including financial planning services, establishing and administering investments and providing custodial and depository services) RBCo may collect the following information:

- name, date of birth and gender;
- contact details such as address, telephone, email and fax;
- occupation;
- bank account details;
- copy of driver's licence and/or passport or other identification documentation for the purpose of verifying identity and ensure compliance with AML/CTF Act, foreign tax compliance reporting or Australian withholding tax;
- tax file number (TFN) and bank account details for the purpose of administering investor accounts and tax reporting and withholding; and
- financial information, including details of:
 - your investments;
 - your insurance policies;
 - taxation information (including TFN); and
- copies of any relevant trust deeds, partnership agreements or constitutions which may be relevant to comply with the AML/CTF Act.

Personal Information in relation to fund assets

As trustee for a Fund, RBCo may hold an asset (for example a lease of a property or a loan to, or guaranteed, by a person) that may require it to collect the following information:

- full name, date of birth, gender and contact details including telephone, address, email and fax;
- a copy of a driver licence and/or passport or other identification documentation for the purpose of verifying identity and residence;



- tax file numbers (TFN) and bank account details for the purpose of administering payments in respect of the relevant Fund asset;
- details about authorised signatories in connection with counterpart to the relevant Fund asset.

It may, on occasion also be necessary in each case to obtain other details, including information relating to powers of attorney or for probate and estate administration.

How do we collect Personal Information?

We collect Personal Information as well as non-personally identifiable information that you voluntarily provide. We will disclose how we manage Personal Information in an open and transparent way, not collect Personal Information unless that information is reasonably necessary for one or more of RBCo's activities and only collect information by lawful and fair means.

We will only collect Personal Information about you:

- from you (including via online enquiry forms you submit, application forms, our direct discussions with you, any emails, blogs, letters, faxes or other correspondence you send to us and when you subscribe to our online publications);
- from a company directly related to RBCo, such as Bentleys (Qld) Pty Ltd, or a member of the Bentleys Group;
- from any person authorised by you to provide such Personal Information to us (such as your professional advisors or personal representatives);
- from third party contractors and suppliers we engage to help us provide services;
- from external sources where the information is publicly and readily available; and
- from third parties (for example, your spouse) where it is otherwise unreasonable or impractical to collect such Personal Information from you directly. In such cases, we will inform you before, or as soon as reasonably practicable after, we collect such Personal Information.

As an example, and without limiting the types of Personal Information we collect, we may collect the following Personal Information (a) name, address, and contact details such as telephone number and email address, (b) details of your interests in or ownership of entities or control of trusts, and (c) accounting information such as your tax file number, bank account details, credit card details and details of your investments.

We will only collect information relating to your tax file number for purposes authorised by law. You are not obliged to provide your tax file number to us but if you fail to do so, there may be financial consequences.

Through technology we may automatically record details including your internet address, domain name and the date and time of your visit to our website (including the web pages viewed), your browser and operating system. If you link to our website from another website then that information may also be recorded. We may also use cookies (small files exchanged between a website server and your computer) on our website. If you do not want to allow cookies to be used to collect information, you can disable cookies on your computer by changing the security and privacy settings in your browser.

Where you provide us with Personal Information of third parties (for example, your spouse) you warrant to us that the relevant individuals have consented to you disclosing their Personal Information to us.

Who we collect Personal Information about

The Personal Information we may collect and hold includes (but is not limited to) personal information about:

- clients;
- potential clients;
- service providers or suppliers;
- prospective employees, employees and contractors; and
- other third parties with whom we come into contact.



Use and Disclosure of Personal Information

How we Use your Personal Information varies based on the services we are providing. Generally, we may Use your Personal Information:

- as necessary to provide services to you;
- to establish and administer investments or other relationships with RBCo or the Licensee;
- to perform due diligence and conflict checks prior to agreeing to provide services to you;
- for customer relationship management purposes and to respond to your queries;
- to comply with other legal obligations such as laws that require RBCo to “*know your customer*” and to report on tax compliance;
- to analyse client needs and improve the services we provide;
- for audit, regulatory and compliance purposes;
- to use artificial intelligence and machine learning tools (AI Tools) to assist with administrative processes, research, data analysis, document preparation and communications in connection with providing our services;
- for industry accreditation purposes;
- for accounting and administrative purposes (including to process transactions, provide accounting services, facilitate our internal business operations and comply with our legal or regulatory obligations);
- consider any concerns or complaints you may have; and
- for other purposes related to our provision of services to you.

Who we might Disclose Personal Information to

- to a related entity of RBCo to allow them to provide you with services or to provide information about the services they provide or so they can assist us in providing applicable services to you;
- to our contractors, agents and service providers (for example, information technology contractors, debt collection agencies, event managers and recruitment and human resources consultants), including service providers located overseas, but only (a) for the purpose of providing services to you, (b) as necessary to facilitate the operation of our business, and/or (c) for the purpose of storing your Personal Information;
- to other entities related to RBCo to facilitate our and their internal business operations;
- to third party providers of artificial intelligence and machine learning tools (AI Tools) that assist us in operating our business and providing services, some of which may be based overseas or use overseas infrastructure;
- to the Australian Taxation Office, the Australian Securities and Investments Commission and other government bodies as required by law or as necessary to provide services to you;
- to third parties with whom we are affiliated for the purpose of those third parties providing you with information about their services and promotions;
- as required or authorised by law or to meet our professional standards;
- to any person with your consent;
- in connection with any sale of an entity related to RBCo; and
- to our professional advisers but only so they can advise us in respect of the same.

In addition, RBCo may:

- where you have requested the provisions of services, Disclose your Personal Information to a related entity of RBCo so they can consider your request and contact you in respect of such services.



Overseas disclosure of Personal Information

We may disclose Personal Information to third parties located outside Australia where this is reasonably necessary for us to carry out our business activities and provide our services. In particular, we engage a limited number of offshore contractors and service providers to assist with certain administrative, operational, information technology and support functions.

Where Personal Information is disclosed overseas:

- it may include information such as contact details, identification information, and other information relevant to the services being performed;
- the countries in which overseas recipients are likely to be located may include, but are not limited to, jurisdictions in Asia and other offshore locations from time to time;
- we take reasonable steps to ensure that any overseas recipient handles Personal Information in a manner consistent with the Australian Privacy Principles, including through contractual arrangements, confidentiality obligations and data security requirements; and
- where required by law, we will obtain your consent to the overseas disclosure of your Personal Information.

By providing your Personal Information to us, you consent to the disclosure of your Personal Information to overseas recipients as described in this Policy.

Use of Artificial Intelligence (AI)

We may use artificial intelligence and machine learning tools (AI Tools) to assist us in providing our services, including for administrative processes, research, data analysis, document preparation and communications.

All professional judgments, advice and final outputs remain those of appropriately qualified RBCo personnel. We review and validate AI-assisted outputs before they are relied upon.

We take reasonable steps to select and use AI Tools appropriately and to protect Personal Information processed through them, including by limiting the information used, removing identifying details where appropriate, restricting access, and using approved technology environments.

Where the use of an AI Tool involves your identifiable information and presents a higher confidentiality or data handling risk, we will, where required by law or applicable professional standards, seek your consent before proceeding.

If you have any questions or preferences regarding our use of AI Tools, please contact us using the details in the Contact Us section below.

Collection, Use and Disclosure of Sensitive Information

We will only collect Sensitive Information from you directly as reasonably necessary to provide services to you and with your consent.

As an example, RBCo may collect Sensitive Information in respect of:

- Investors, during their review of AML/CTF review, for example where a potential investor is identified as high risk because they have a criminal record or a political party affiliation; or
- Potential employees where pre-appointments checks such as bankruptcy and criminal record are performed.

We will only Disclose Sensitive Information in accordance with the Act as follows: (a) for the primary purpose for which it was collected, (b) for a secondary purpose that is directly related to the primary purpose, or (c) as required by law.

Information regarding your tax file number will only be Disclosed to you personally and according to relevant laws (including, where you are an individual, in compliance with the Privacy (Tax File Number) Rule 2015 made under section 17 of the Act).



Direct Marketing

We may Use or Disclose your Personal Information for direct marketing purposes, being:

- to promote our services and provide you with information and marketing materials about other services that may be of interest to you including services provided by related entities of RBCo;
- to provide information relevant to your type of business or other area of expertise or interest; and
- to provide you with the opportunity to attend seminars, conferences or other events that may be of interest to you.

If you do not wish to receive direct marketing communications from us, you can 'opt out' by clicking the 'Unsubscribe' link in our emails or other electronic communications, or sending an email to us at the contact details in the Contact Us section below with your contact details requesting that you no longer receive direct marketing materials from us. We will remove you from our direct marketing database as soon as reasonably practicable after receiving a request but in any event, within 30 days of receiving such a request.

Keeping Personal Information accurate and up-to-date

We are committed to ensuring that the personal information we collect, Use and Disclose is relevant, accurate, complete and up-to-date.

We encourage you to contact us to update any personal information we hold about you. If we correct information that has previously been Disclosed to another entity, we will notify the other entity within a reasonable period of the correction. Where we are satisfied information is inaccurate, we will take reasonable steps to correct the information within 30 days, unless you agree otherwise. We do not charge you for correcting the information.

Collection of Credit Information

We may provide credit to you from time to time (for example, by giving you time to pay our account for services) and this may involve the collection of Credit Information. We may collect Credit Information about you (a) directly from you or from persons acting on your behalf (including via application forms submitted by you or on your behalf), and (b) from third parties, including credit reporting bodies and other credit providers, to assist us in determining whether we will provide credit to you.

Use and Disclosure of Credit Information

With your express consent, as required by law or court order and otherwise in accordance with Part IIIA of the Act and the Code, we may Use or Disclose the Credit Information we have collected to:

- credit reporting bodies;
- any related entities of RBCo;
- third parties that perform credit assessment and debt collection services on our behalf;
- our contractors, agents and service providers; and
- current or prospective guarantors in relation to credit we may provide to you.

We may Use or Disclose Credit Information we have collected about you to:

- decide whether or not to provide credit to you;
- assess your suitability to act as a guarantor for another credit facility;
- collect outstanding debts and enforce guarantees; and
- comply with our legal or regulatory obligations.

We may also Use Credit Information we hold about you for internal management purposes and to respond to queries or complaints about our treatment of your Credit Information. We may Disclose your Credit Information to credit reporting bodies if you fail to make payments to us or if you commit a serious credit infringement.



The credit reporting policies for such credit reporting bodies will be available on their websites. You have the right to contact any credit reporting bodies to whom we Disclose your Credit Information and request that they do not (a) Use your Credit Information for pre-screening purposes to determine your eligibility to receive direct marketing from credit providers, and (b) Use or Disclose your credit information if you have been or are likely to be a victim of fraud.

Management of Personal Information and Credit Information

We recognise the importance of securing the personal information of our customers. We will take steps to ensure your personal information is protected from misuse, interference or loss, and unauthorised access, modification or Disclosure.

Your personal information is generally stored in our computer database. Any paper files are stored in secure areas. In relation to information that is held on our computer database, we apply the following guidelines:

- passwords are required to access the system, and passwords are routinely checked;
- data ownership is clearly defined;
- employees have restricted access to certain sections of the system;
- the system automatically logs and reviews all unauthorised access attempts;
- all computers which contain personal information are secured both physically and electronically;
- data is encrypted during transmission over the network;
- access to, and use of, AI Tools is restricted to those approved under our internal AI Policy, with controls governing data inputs, outputs and retention; and
- print reporting of data containing personal information is limited.

Where our employees work remotely or from home, we implement the following additional security measures:

- two-factor authentication is enabled for all remote working arrangements;
- password complexity is enforced, and employees are required to change their password at regular intervals;
- we ensure that employees only have access to personal information which is directly relevant to their duties;
- employees are not permitted to work in public spaces;
- we monitor access to personal information, and will investigate and take appropriate action if any instances of unauthorised access by employees are detected;
- employees store devices in a safe location when not in use; and
- employees may not Disclose an individual's personal information to colleagues or third parties via personal chat groups.

Accessing and correcting Personal Information and Credit Information

On your request, except to the extent that we are lawfully able to refuse such a request, we will provide you with access to Personal Information and Credit Information that we hold about you. All requests about the Personal Information or Credit Information that we hold should be made by email or in writing to us (see Contact Us section of this Policy for our contact details). We will try to respond to your request within a reasonable period.

If you satisfy us that Personal Information or Credit Information that we hold about you is misleading, inaccurate, out of date or incomplete, except to the extent that we are lawfully able to refuse such a request, we will correct the Personal Information and Credit Information that we hold about you. If it is reasonable and practicable to do so, we will give you access to your Personal Information and Credit Information in the manner that you request. We do not generally charge for providing such access but may do so in certain circumstances.

In the event that we deny access to or refuse to correct your Personal Information or Credit Information that we hold, we will provide you with written reasons and the mechanisms available to complain about such refusal.



Updates to this Privacy Policy

This Privacy Policy will be reviewed from time to time to take account of new laws and technology, and changes to our operations and the business environment.

Contact Us

If you have any queries in respect of our Policy or to request access to your information or make a complaint, please contact us by email or in writing to the privacy officer at the following details:

Rawlings Bolton & Co Pty Ltd

ABN: 14 662 085 761

ACN: 662 085 761

Attention: Stavros Sotiriou, Risk and Compliance Manager

Level 23, 71 Eagle Street, Brisbane QLD 4000 Australia

T: +61 7 2146 8050

E: compliance@rbco.au

Definitions

Act - Means Privacy Act 1988.

AI Tools - Means artificial intelligence enabled software, systems, models and machine learning tools used by RBCo to assist in providing services or performing its functions.

Credit Information - Includes identification information (for example, name, date of birth, driver's licence number, current and recent addresses and employment details), historical details of credit (including type and amount of credit sought or obtained) and repayment history, information about applications for credit, information about defaults and payment arrangements, details of insolvency proceedings, bankruptcy agreements, judgements and arrangements with creditors, information relating to activities and credit worthiness in Australia and external Territories, information recorded on the National Personal Insolvency Index and opinions of credit providers regarding serious credit infringements.

Disclose - Means the act of making Personal Information know, accessible or visible to a related company or to a third party.

Personal Information - Means information (including an opinion) about an individual whose identity is apparent or can reasonably be ascertained from the information whether true or not and whether or not recorded in a material form.

Sensitive Information - Has the meaning given by the Act and includes Personal Information which relates to an individual's racial or ethnic origins, religious beliefs or affiliations, trade association, trade union membership, sexual orientation, criminal record and information as to an individual's health or biometric information.

Use of Personal/Sensitive/Credit Information - Means RBCo uses Personal Information when it handles and manages that information within its effective control. Examples include assessing, reading, searched of the Personal Information or transferring the Personal Information to other entities or making decisions based on the Personal Information.

