



SENTINEL

F I N A N C I A L G R O U P

PRIVACY POLICY

Sentinel is committed to protecting your privacy and the confidentiality of personal information (e.g. your full name, address, contact details, investments you hold etc) we collect and hold about you. This commitment is fundamental to the way we do business and we have a long history of handling personal information confidentially.

Sentinel has systems and procedures in place to protect your privacy whenever we collect, store, use or disclose your personal information. You can request details about the information we hold about you and you have the right to ask us to correct that information.

This Privacy Policy explains our systems and procedures, and provides information on all relevant issues, including how to make a complaint and your rights to access and correct the information we have about you.

Privacy Legislation and the National Privacy Principles

As a financial services organisation we are subject to certain legislative and regulatory requirements which necessitate us to obtain personal information about you, including s961B of the Corporations Act and the Anti-Money Laundering and Counter-Terrorism Financing Act 2006.

Sentinel is bound by the National Privacy Principles set out in the Privacy Amendment (Private Sector) Act, 2001. This Privacy Policy reflects our commitment to those principles.

Definitions

In this Privacy Policy, a reference to:

“Sentinel”, “we”, “our”, and “us” means Sentinel Financial Group Pty Ltd ABN 26 104 456 288 (trading as Sentinel) and all Sentinel related companies.

“You” and “your” refer to the individual whose information we collect and hold for our purposes.

“Securities” means shares, bonds, bank bills, convertible notes, units in managed investment schemes, related derivatives and other equity or debt financial products whether listed or unlisted.

“ASX” means Australian Securities Exchange Group Ltd.

“AUSTRAC” means Australian Transaction Reports and Analysis Centre.

What sorts of personal information do we hold about you?

As a Participating Organisation of the ASX and a licensed Securities Dealer we are subject to legislative and other regulatory requirements which necessitate us obtaining and holding information which personally identifies you.

Sentinel Financial Group collects personal information in a number of ways, including:

- directly from you, when you attend a face-to face interview;
- directly from you, when you provide information through a data collection form;
- directly from you, when you provide information by phone;
- directly from you via an email or the internet; and
- directly from fund managers, other financial advisers, superannuation funds, life insurance companies and other product issuers once authorisation has been provided by you. Note that you have a right at all times to refuse us authorisation to collect information from a third party.

In general, the nature of personal information collected and maintained, as a minimum, includes name, residential and postal addresses, contact details (including phone numbers, fax and e-mail address) and banking details. We may also hold information about:

- Your occupation.
- Your Tax File Number, if you have provided it to us.
- Your financial circumstances (i.e. situation, objectives and needs), including your salary, other sources of income, levels of debt and living expenses, your investments and your attitude to investment risk.
- Your employer’s name and address.
- The names and addresses of your dependants or beneficiaries.
- Other matters which you have informed us about.

There may be occasions when we may receive or need to source personal information about you from third-parties such as credit reporting agencies, our business alliance partners and government agencies (e.g. Centrelink).

Your Information must be accurate

We take reasonable steps to ensure that your personal information is accurate, complete and up-to-date at the time of collection, use or disclosure. In accordance with regulatory requirements, we need your personal information to be accurate, complete and up to date. If you provide inaccurate or incomplete information we may not be able to provide you with the products or services you are seeking. To assist us with this, please contact us if any details you have provided change.

How do we use your personal information?

We only collect personal information about you to the extent that it is necessary to perform our services and activities.

Sentinel will use the personal information collected for the purpose of opening and maintaining an account with Sentinel to enable execution and timely settlement of securities transactions on your behalf. Personal information collected may also be used by Sentinel to provide you with advice, including recommendations suitable for you personally.

Sentinel may also use your personal information for any secondary related purposes in circumstances where you would reasonably expect this to be the case (e.g. applications for new issues of securities; portfolio reviews; mail-outs of research, newsletters or direct marketing material that may be of interest to you; facilitating authorised direct credits/debits with your Bank or other financial institution).

Where you require us to buy or sell foreign securities we may send information overseas to Stockbrokers and Custodians appointed by Sentinel, but depending on the country in question they may not be required to comply with at least the same privacy standards. We will only transfer your personal information overseas if it is necessary and, where comparable standards of privacy are not certain, with your consent.

If you do not consent to your personal information being used as described above or if you do not provide the personal information requested, this may affect our ability to provide some or any of our advisory or transactional services to you.

Your consent to use and disclosure is important

Subject to what is stated below, personal information is usually used or disclosed only after obtaining your consent. Your consent can be express (i.e. verbal or written) or implied. You imply consent when we can reasonably conclude that you have given consent by some action you take or by not taking some action.

Do we usually disclose information to other organisations or people?

We will not disclose information about you unless:

- required by law or other regulations (e.g. ASIC, ASX, AUSTRAC, the Courts and the Australian Tax Office have the power to order us to disclose information about your account/s);
- authorised by law (e.g. to protect our interests or where we have a duty to the public to disclose);
- it is part of internal business matters such as in the case of a potential take-over, merger or sale of the business; or
- you have consented to our disclosing the information about you.

As part of us providing stockbroking services we will be required to disclose your personal information to:

- The Australian Clearing House (CHES), share registries, financial institutions, service providers (such as software providers, delivery companies and mail houses) and where applicable margin lenders.

- Underwriters or corporate advisors where you are applying for securities in an initial public offering or new issue.
- Where relevant, your executor, administrator, trustee, guardian or attorney.
- Entities we use for printing and despatch of reports, newsletters and other services we provide to you.
- Credit reference agencies (e.g. The Stockbrokers Mutual Reference Society Limited) and debt collection agencies where you fail to meet your contractual obligations.
- Your bank or other financial institutions for direct credits or debits.
- Your agents, including your legal or financial advisers, or those who have referred you to us.
- Other Stockbrokers when we facilitate transfer of your CHESS Sponsored holdings of securities following your instructions to do so.
- Stockbrokers and Custodians for the purpose of completing transactions in foreign securities.
- Auditors, external advisers, consultants and other contractors to whom certain functions and activities are contracted. In these circumstances, confidentiality arrangements apply and we prohibit them from using your personal information except for the specific purpose for which it needs to be accessed or supplied.

In the event of that we propose to sell the business, we may disclose your personal information to potential purchasers for the purpose of them conducting due diligence investigations. Disclosure will be made in confidence and it will be a condition of that disclosure that no personal information will be used or disclosed by them.

What if you are a corporation?

If you are a company or association, and you have provided us with personal information about an officer or employee of yours in respect of your account with us, you must show this Privacy Policy to that officer or employee.

Do we use and disclose your TFN or other government identifier?

We do not use your Tax File Number as an account number. We only use and disclose your TFN for the purposes required by law and as instructed by you.

Marketing and Privacy – Do you want to hear about new or current services?

We may contact you from time to time to tell you about new or existing services that may be of interest to you. If, at any time, you do not wish to receive this information any further, you may contact us with this request .We will endeavour to meet your request within 2 weeks. We maintain a Register for those individuals not wanting direct marketing material.

We do not sell mailing lists. We do not disclose names and addresses to third-parties for the purposes of allowing them to market their products and services to you.

Website Usage

'Our Website utilises cookies to provide you with a better user experience. Cookies also allow us to identify your browser while you are using our site – they do not identify you. If you do not wish to receive cookies, you can instruct your web browser to refuse them.

Personal Information Security

Sentinel recognises how important the privacy of your personal information is to you and we undertake to store that information in a secure manner. We will protect personal information from unauthorised access, modification and disclosure; misuse and loss; and (subject to record retention regulations) destroy or permanently de-identify personal information we no longer need.

Please note that even if we are no longer providing services to you we are obliged due to legislative and regulatory requirements to retain your personal information in a form which does identify you for a period of up to 7 years.

Your personal information is stored in our back-office (i.e. client account administration) system which is protected by company logins and passwords, which can only be accessed by personnel authorised by Sentinel. Access to our office premises is protected by security procedures, systems and locks.

Sensitive Information

Without your consent we will not collect information about you that reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs or afflations, membership of professional or trade association, membership of a trade union, details of health, disability, sexual orientation, or criminal record.

This is subject to some exceptions including where the collection is required by law; and when the information is necessary for the establishment, exercise or defence of a legal claim.

Personal information will be treated as confidential information and sensitive information will be treated highly confidential.

You can request access to personal information we hold about you.

Where you are entitled to access, the time we require before giving you the information or access will depend on the type of information requested. If we can, we will answer your question immediately. We will also try to answer you in the same way that you ask, for example, if you telephone to ask for the information we will, if practicable, give you that information over the telephone. We will generally respond to a written request in writing.

Sometimes, we will ask that you put your request in writing, for example, where it is necessary for us to retain a record of your request or where you want copies of material or access to older information or files which are not current.

We may ask you to identify yourself to our satisfaction. You can deal with us anonymously where it is lawful and practical to do so (for example, if you telephone requesting our postal address).

In some circumstances, we may charge a fee for giving you access, which will vary but will be based on our costs (internal and external) in locating the information and the form of access you require. If we propose to charge a fee for giving access, we will give you an estimate of the fee so you can confirm that you still want us to give you access to the information. We do not impose any charge for lodging a request for access.

If we are entitled under the National Privacy Principles to refuse to give you access, we will tell you and provide reasons (e.g. access would infringe the privacy of others, the information relates to anticipated legal proceedings, the law prevents us from doing so).

Some exceptions exist where we will not provide you with access to your personal information if:

- providing access would
- pose a serious threat to the life or health of a person;
- providing access would have an unreasonable impact on the privacy of others;
- the request for access is frivolous or vexatious;
- the information is related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings;
- providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations;
- providing access would be unlawful;
- denying access is required or authorised by or under law;
- providing access would be likely to prejudice certain operations by or on behalf of an enforcement body or an enforcement body requests that access not be provided on the grounds of national security.'

Should we refuse you access to personal information, we will provide you with a written explanation for that refusal.

What if some of the information Sentinel Financial Group holds is incorrect?

Please tell us. We want our records to be accurate, complete and up-to-date. Unless we disagree with you about the accuracy or completeness of a record, we will generally correct it on request (or suggest alternative arrangements for updating our records). If we disagree with you, we will give you our reasons.

How do I make further enquiries or complain about a breach of privacy?

If you require more information about the way we manage personal information or wish to make a complaint about a breach of your privacy, please contact us (see below for details) and ask to speak to our Privacy Officer.

Call Us

Privacy Officer
(08) 9225 0000

Write to Us

The Privacy Officer
Sentinel Ltd
GPO Box 2514
Perth WA 6001

If we are unable to satisfactorily resolve your concerns you can contact the Office of the Federal Privacy Commissioner who may investigate the matter further and make a determination. To make a query concerning your privacy rights, or to lodge a complaint with the Federal Privacy Commissioner about how we have handled your personal information, contact the Commissioner's hotline service on 1300 363 992.

Changes to this Privacy Policy

We reserve the right to review and amend this Privacy Policy from time to time. We encourage you to check our website regularly for any updates to our Privacy Policy at www.sentinelgroup.com.au.

Additional Privacy Information

Further information on privacy in Australia may be obtained by visiting the Website of the Office of the Federal Privacy Commissioner at <http://www.privacy.gov.au>.