

Mutual Trust Group

Privacy Statement

Your rights in relation to privacy

The privacy of personal information is important to Mutual Trust Pty Ltd (ABN 71 004 285 330) and its related entities ("Mutual Trust Group (MTG), we or us"). The Mutual Trust Group is committed to protecting the privacy of an individual's personal information. This statement sets out how the Mutual Trust Group aims to protect the privacy of your personal information, your rights in relation to your personal information managed by us and the way the Mutual Trust Group collects, holds, uses and discloses your personal information.

In handling your personal information, we comply with the Australian Privacy Principles set out in the *Privacy Act 1988 (Cth)* (Privacy Act).

What kinds of personal information does the Mutual Trust Group collect?

Personal information is information or an opinion about an identified, or reasonably identifiable, individual. During the provision of its services, the Mutual Trust Group may collect your personal information.

The personal information the Mutual Trust Group collects depends on, and is specific to, the products and services you engage us to provide. Generally, the kinds of personal information we collect includes:

- your name, address, telephone number, email address and date of birth;
- other identification verification information, including photographic information, from documents including your birth certificate, passport, driver's license, pension card, citizenship certificate, tax notice assessment, Medicare card and utilities notices;
- financial information about your assets, occupation and income, account balances, bank account details, account activities, trust arrangements, payment history and transactions with us and third parties;
- tax information including your tax file number, tax returns and related information;
- professional and business information about your membership of a professional association, partnerships, directorships, business names and trust arrangements.

The MTG is also required to collect and verify identification information as required by the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)*. In some circumstances, we may also hold other personal information provided by you.

As part of the Mutual Trust Group recruitment process for employees and contractors, we may collect and hold the following kinds of personal information about you: your name, contact details, date of birth, citizenship, employment references, civil, credit and criminal records, regulatory accreditation (such as RG 146 accreditation for advisers), media, directorship, property ownership and driver's licence information, education and employment history. In the employment context, we may also collect and hold your TFN, financial information and banking details.

How does the Mutual Trust Group collect personal information?

Generally, the Mutual Trust Group collects your personal information directly from you, through:

- completion of an application or other form either online or in hard copy;
- provision of original, or copies of, documentation whether delivered in person, by post or electronically;
- direct communication via meetings or telephone meetings and exchanges;
- recordings of conversations (in which case you will be informed of such recording prior to the recording commencing);
- email, or other electronic, correspondence or via the Mutual Trust website; or
- receipt of mail which you have directed to be sent to the Mutual Trust Group.

There may be occasions when the Mutual Trust Group collects your personal information from other sources such as from an information services provider, publicly maintained record or third parties such as your family members or professional advisers where we are authorised to do so. Generally, the MTG will only collect your personal information from sources other than you if it is unreasonable or impracticable to collect your personal information from you. The MTG does not currently collect or store information on the use of its website.

Why does the Mutual Trust Group need your personal information?

The Mutual Trust Group collects, holds, uses and discloses your personal information where it is reasonably necessary for the purposes of:

- providing its products and services to you, including providing:
 - wealth management and investment products and services;
 - tax, accounting and superannuation products and services including audit insurance;
 - estate and succession planning products and services;
 - document and asset custody services;
 - family office services, being financial and intergenerational wealth management products and services specific to family groups;
 - products and services in accordance with any agreement you enter into with the Mutual Trust Group;

- accounting, billing and other administrative purposes;
- identifying and informing you of products and services that may be of interest to you from the Mutual Trust Group or other selected third parties; and
- any legal requirements, including the Mutual Trust Group’s obligations under:
 - the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)*;
 - applicable taxation law;
 - the *Corporations Act 2001 (Cth)*;
 - the *Australian Securities and Investments Commission Act 2001 (Cth)*; and
 - the *Bankruptcy Act 1966 (Cth)*.

Tax file numbers are only collected for tax-related purposes.

Where personal information is used or disclosed, the Mutual Trust Group takes reasonable steps to ensure it is relevant to the purpose for which it is to be used or disclosed. You are under no obligation to provide your personal information but without certain personal information, the MTG may not be able to provide the products or services you require.

To whom does the Mutual Trust Group disclose your personal information?

Generally, the Mutual Trust Group will only disclose your personal information for the purposes of providing its products and services to you. This may include disclosing your personal information to various entities within the Mutual Trust Group and third parties where necessary to provide you with our products and services. These third parties may include government departments or other regulatory authorities and professional associations, our lawyers, auditors, financial market and clearing and settlement facility operators, lenders, credit providers, insurers and audit insurance providers, custodians, share registries, certain software and IT providers, third parties engaged to perform administrative tasks, professional advisers or, if authorised by you, your staff, family members, and associated entities. This disclosure is always on a confidential basis. The Mutual Trust Group may also disclose your personal information with your consent or if disclosure is required or authorised by law.

Overseas disclosure

We may disclose personal information to overseas recipients in order to provide our products and/or services and for administrative or other business management purposes. Recipients of such disclosures are likely to be located in UK, New Zealand, Belgium, Hong Kong, South Africa and the United States of America.

Before disclosing any personal information to an overseas recipient, the Mutual Trust Group takes reasonable steps to ensure the overseas recipient complies with the Australian Privacy Principles or is bound by a substantially similar privacy scheme unless you consent to the overseas disclosure or it is otherwise required or authorised by law.

Direct marketing

The Mutual Trust Group may use and disclose your personal information in order to inform you of products and services that may be of interest to you. In the event you do not wish to receive such communications, you can opt-out by contacting our Privacy Officer on the contact details set out below or through any opt-out mechanism contained in a marketing communication to you.

Security of your personal information

The Mutual Trust Group regards the security of personal information as very important and has implemented a range of measures to ensure the personal information it holds is protected from misuse, interference and loss and from unauthorised access, modification or disclosure. The protection measures in place include:

- confidentiality requirements for employees;
- confidentiality statements on all outgoing correspondence including email;
- document storage security policies;
- security measures including encryption, firewalls, site monitoring and intrusion detection;
- providing a discreet environment for confidential discussions; and
- only allowing access to personal information where the individual seeking access has satisfied the Mutual Trust Group's identification requirements.

However, the Mutual Trust Group cannot guarantee the security of personal information provided to us electronically via the internet, email or text nor can it guarantee the safe delivery of personal information via ordinary post and as such any communication is made at your own risk. The security arrangements are reviewed and tested from time to time.

Can you access and correct the personal information that the Mutual Trust Group holds about you?

The Mutual Trust Group seeks to ensure personal information we hold is accurate, current, complete, relevant and not misleading. Under the Privacy Act, you have a right to access and seek correction of your personal information that we collect and hold.

If at any time you would like to access or correct the personal information the MTG holds about you, or you would like more information on information security or privacy please contact the Privacy Officer. The Mutual Trust Group will grant access to the extent required or authorised by the Privacy Act or other law and take steps reasonable in the circumstances to correct personal information where necessary and appropriate. To obtain access or make a correction to your personal information we will have to verify your identity and may charge you an administration fee.

If the Mutual Trust Group refuses your request to access or correct your personal information, we will provide you with written reasons for the refusal and details of complaint mechanisms. The Mutual Trust Group will endeavour to respond to your request to access or correct your personal information within 30 days from your request.

How to contact us - further information, enquiries, or requests

For further information, enquiries or requests regarding your personal information, or if you would like to opt-out of receiving any promotional and marketing communications, please contact the MTG Privacy Officer.

Complaint handling processes

Please direct all privacy complaints to the Mutual Trust Group's Privacy Officer.

The Privacy Officer
Mutual Trust Pty Ltd
Level 33,
360 Collins Street, Melbourne VIC 3000
Telephone: +61 3 9605 9500
Facsimile: +61 3 9605 9599

As the holder of an Australian Financial Services Licence (AFSL), Mutual Trust Pty Ltd is a member of an external dispute resolution scheme, the Financial Ombudsman Service Limited (FOS). FOS may be able to assist with any complaints about privacy matters where it relates to the provision of financial services, financial products or advice under the Mutual Trust AFSL and FOS deems the matter to be within its terms of reference. You can contact FOS:

Financial Ombudsman Service
GPO Box 3
Melbourne VIC 3001
Toll free number: 1 300 780 808
Facsimile: (03) 9613 6399
Email: info@fos.org.au
Online at: www.fos.org.au

In the event that you are dissatisfied with the outcome of your complaint, you may refer the complaint to the Office of the Australian Information Commissioner (OAIC) on 1300 363 992.

This privacy statement may be updated from time to time.