



PRIVACY POLICY

RIGHTS TO PRIVACY

Frais Capital Pty Ltd (ACN 656199 674) (Frais, we, us, our) is a Corporate Authorised Representative (CAR) of Frais Capital Group Pty Ltd (ACN 655 773 710) who holds AFSL 5371952.

The privacy of your information is very important to us and we will ensure that your personal information is handled in accordance with the Privacy Act 1988 (Cth) (Privacy Act) and the Australian Privacy Principles in the Privacy Act.

This privacy policy sets out how we protect the privacy of your personal information, your rights in relation to your personal information managed by us and the way we collect, hold, use, disclose and otherwise manage your personal information.

We regularly review our practices and procedures regarding how we collect, hold, use, disclose and otherwise manage personal information. As a result, this policy may be updated from time to time. Where we update this policy we will make the updated policy available, including on our website located at www.Fraiscapital.com.

WHAT KINDS OF PERSONAL INFORMATION DOES FRAIS COLLECT?

For the purposes of the Privacy Act, personal information is information or an opinion, whether true or not and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

The kinds of personal information that we collect will vary depending on the type of dealings we have with you and how you interact with us. For example, when you apply to open a wealth management account, the kinds of personal information that we may collect include:

- a) your name, address, email address or other similar contact details;
- b) documents to confirm your identity including passport, driver's licence, tax file number and other government issued documents;
- c) your date of birth;
- d) your bank account details;
- e) information regarding your finances and financial status, including source of wealth, investment experience and objectives, and risk tolerance; and
- f) in certain circumstances, to meet our regulatory obligations, personal details relating to your immediate family members and details relating to any senior political figures (e.g. senior military or government official) to whom you are connected.

We will not generally collect or hold sensitive information about you, unless we are required to do so by law. Sensitive information includes information about your race, political or religious beliefs, sexual preferences, criminal convictions, membership of professional or trade associations or unions or health information. If we do collect or hold sensitive information about you it will be with your prior consent and that sensitive information will be destroyed when it is no longer needed for us to provide you with our services.

HOW DOES FRAIS COLLECT PERSONAL INFORMATION?

There are a number of circumstances in which Frais will collect personal information from you. For example, Frais may collect personal information:

- a) when you apply to open a wealth management account;
- b) when you seek asset and investment portfolio advice from us;

- c) when you seek superannuation, insurance or estate planning advice from us; or
- d) when you request that we execute a securities transaction on your behalf.

We may also collect personal information when we monitor or record our communications with you or through use of certain technology.

Generally, we will collect personal information directly from you, or for example, when you submit an application form to us or otherwise contract or interact with us directly. However there may be other occasions when we collect your personal information from other sources, such as from a publicly maintained record, persons authorised by you (for example, your accountant, financial adviser, custodian or corporate trustee) or other agents or service providers (such as agencies used for assisting with account opening, screening and ongoing monitoring checks).

WHY DOES FRAIS COLLECT YOUR PERSONAL INFORMATION?

We collect, hold, use and disclose your personal information for purposes relating to providing wealth management advice, financial planning or other financial services, including for the purposes of:

- 1) processing and administering your wealth management account and for any authorised entity as directed by you;
- 2) buying and selling securities on your behalf and any authorised entity as directed by you and pay dividends to you and any authorised entity as directed by you;
- 3) executing settlement and registration of securities interests;
- 4) providing you with financial advice concerning your asset portfolio,

- investment portfolio, superannuation, insurance and estate planning;
- 5) responding to your queries;
- 6) otherwise perform our duties as a Corporate Authorised Representative of an Australian Financial Services licence holder, including to carry out financial crime screening, conflict checks, and for fraud prevention;
- 7) providing you with promotional information, updates regarding Frais or invitations to events which may be of interest to you, subject always to our legal obligations and your ability to opt out; and
- 8) evaluating and improving our products and services.

We may also collect, hold, use and disclose personal information to undertake identification and verification processes in accordance with the Anti-Money Laundering and Counter Terrorism Financing Act (Cth) or any other relevant laws. For certain investors, we may also be required to collect and disclose certain personal information to the Australian Taxation Office in order to comply with the Foreign Account Tax Compliance Act.

You are under no obligation to provide your personal information to us. However, if you do not provide the personal information requested by Frais or provide incomplete or inaccurate information, Frais, may not be able to accept or process your application to open a wealth management account, may be limited in the services it can provide when advising you in relation to your financial affairs, executing a security transaction on your behalf, or may not be able to properly respond to your queries or requests for information.

Frais does not intend to disclose your personal information to third parties for the purposes of those third parties advertising or marketing our products and services or making offers to you.

WHO DOES FRAIS DISCLOSE YOUR PERSONAL INFORMATION TO?

Generally we will only disclose your personal information to third parties for a purpose related to the provision of wealth management services or any related purposes. We may also disclose your personal information to third parties for other purposes with your consent or for any purpose if the disclosure is required or authorised by law.

The types of organisations to which we may disclose your personal information include:

- e) your accountants, lawyers, authorised representatives (including custodians and corporate trustees);
- f) any other third party service provider which we may engage, for example, to provide share registry services, settling agents, identity verification service providers, information technology, auditing, mailing, printing or other services;
- g) Government authorities as required by law including Australian Securities and Investment Commission, Australian Securities Exchange and the Australian Tax Office;
- h) a party in response to a subpoena or court order; and
- i) our professional advisers (including legal and accounting firms, auditors, insurers, consultants and other advisers).

Frais may disclose your personal information to overseas vendors or service providers for example for hosting and data storage service services. Without limiting the foregoing, your data may be disclosed by us to vendors in regions such as Canada, Hong Kong, India, Singapore, United Kingdom, and the United States of America.

SECURITY OF YOUR PERSONAL INFORMATION

We may hold your personal information in both hard copy and electronic forms.

We will take reasonable steps to ensure that the personal information we hold is protected against misuse, loss, unauthorised access, modification or disclosure.

Personal information is held on secured servers or in storage located in controlled, access restricted environments. Our employees are required to maintain the confidentiality of any personal information held by us.

Personal information may also, in certain circumstances, be held on behalf of Frais in hard copy or electronic forms by Frais's service providers (such as offsite document storage providers and electronic data storage providers).

CAN YOU ACCESS OR CORRECT THE PERSONAL INFORMATION THAT WE HOLD ABOUT YOU?

Frais takes steps reasonable in the circumstances to ensure that the personal information it collects, holds, uses and discloses about an individual is accurate, complete, up-to-date, relevant and not misleading.

Under the Privacy Act, you have a right to request access to or correction of your personal information that is collected and held by us.

If at any time you would like to request access to or correction of the personal information we hold about you, or you would like more information on our approach to privacy, please contact our Compliance Officer, using the contact details set out below.

To obtain access to or correction of your personal information, we may request that you provide us with proof of your identity. This is necessary to ensure that personal information is

provided only to the correct individuals and that the privacy of others is protected.

Upon receiving a request for access to or correction of personal information we will review the request, make a decision regarding the request and notify you of that decision.

We will seek to respond to requests for access to or correction of personal information within 30 days of the date of the request.

DOES FRAIS DISCLOSE YOUR INFORMATION TO CREDIT REPORTING BODIES (CRB)?

We are required to verify your identity under the AML Act before providing you with our services. In order to verify your identity electronically, we will ask for the following personal information:

- name;
- address;
- date of birth; and
- details of and in some cases copies of your identification documents.

You acknowledge that your personal information may be passed on to external organisations including government agencies and CRB. Your personal information may be disclosed to our agents who assist with the electronic identity verification process.

The use of your personal information for electronic identity verification does not constitute a credit check or impact your credit standing in any way. A CRB may inform us as to whether the personal information provided is a full or partial match with information held on credit information files.

Your details will also be submitted to the Australian Government's Document Verification Service (**DVS**). The DVS is a national online

system that allows organisations to compare an individual's identifying information with a government record. More information about the DVS is available on their website.

Other methods of verification

You do not have to agree to electronic verification. You can choose for your identity to be verified in person, please let us know if that is your preference.

HOW TO CONTACT US

For further information or enquiries regarding your personal information or to request access to or correction of personal information or to make a privacy complaint, please contact our Compliance Officer using any of the following contact details:

Email: compliance@Fraiscapital.com

Phone: 1800 237 446

Post: Level 2, 183-185 Flinders Lane, Melbourne, VIC 3000

PRIVACY COMPLAINTS

If you believe that we have not dealt with your personal information in a manner that complies with the Privacy Act or the Australian Privacy Principles, you can make a complaint to us.

Please direct all privacy complaints to our Compliance Officer in writing using the contact details set out above.

We will deal with your complaint promptly and fairly. At all times, privacy complaints will be treated seriously, will be dealt with in a confidential manner; and will not affect your existing obligations or affect the commercial arrangements between you and us.

We will seek to provide a final response to you within 30 days of the date of the complaint.

In the event you are dissatisfied with the outcome of your complaint, you may refer it

to one of the following complaint handling bodies, to the extent relevant to your complaint. These are free to access.

Office of the Australian Information Commissioner

Visit: www.oaic.gov.au/
Email: [enquiries@oaic.gov.au/](mailto:enquiries@oaic.gov.au)
Call: 1300 363 992
Mail: GPO Box 5218, Sydney NSW 2001

Australian Financial Complaints Authority

Visit: www.afca.org.au/
Email: info@afca.org.au
Call: 1800 931 678
Mail: GPO Box 3, Melbourne VIC 3001

PRIVACY COLLECTION STATEMENT

This Privacy Collection Statement applies to the collection of personal information by or on behalf of Fraiss Capital Pty Ltd (ACN 656199 674) (Fraiss, we, us, our) a Corporate Authorised Representative (CAR) of Fraiss Capital Group Pty Ltd (ACN 655 773 710) who holds AFSL 416354.

Fraiss may collect personal information from you for a range of reasons, depending on our particular dealings or interactions with you. Generally speaking, Fraiss collects personal information as part of its account opening, account administration, investment management and financial planning processes, to respond to your queries or to provide you with information you request.

The kinds of personal information collected by Fraiss may include:

- a) your name, address, email address or other similar contact details;
- b) documents to confirm your identity including passport, driver's licence, tax file number and other government issued documents;
- c) your date of birth;

- d) your bank account details;
- e) information regarding your finances and financial status, including source of wealth, investment experience and objectives, and risk tolerance; and
- f) in certain circumstances, to meet our regulatory obligations, personal details relating to your immediate family members and details relating to any senior political figures (e.g. senior military or government official) to whom you are connected.

Fraiss may also be required or authorised by law to collect certain personal information from you and/or disclose your personal information. For example, Fraiss may be required to collect and disclose certain information in order to comply with the identification and verification requirements imposed under the Anti-Money Laundering and Counter Terrorism Financing Act 2006 (Cth). For certain investors, Fraiss may also be required to collect and disclose certain personal information to the Australian Taxation Office in order to comply with the Foreign Account Tax Compliance Act.

Fraiss collects this personal information so that it can:

- 1) process and administer your wealth management account and for any authorised entity as directed by you;
- 2) buying and selling securities on your behalf and any authorised entity as directed by you and pay dividends to you and any authorised entity as directed by you;
- 3) execute settlement and registration of securities interests;
- 4) provide you with financial advice concerning your asset portfolio, investment portfolio, superannuation, insurance and estate planning;
- 5) respond to your queries;

- 6) otherwise perform its duties as a holder of an Australian Financial Service licence including to carry out financial crime screening, conflict checks, and for fraud prevention;
- 7) provide you with promotional information, updates regarding Frais or invitations to events which may be of interest to you, subject always to our legal obligations and your ability to opt out; and
- 8) evaluate and improve our products and services.

If you do not provide the personal information requested by Frais or provide incomplete or inaccurate information, Frais, may not be able to accept or process your application to open a wealth management account, may be limited in the services it can provide when advising you in relation to your financial affairs, executing a security transaction on your behalf, or may not be able to properly respond to your queries or requests for information.

The Frais Privacy Policy (**Privacy Policy**) sets out details of how Frais will collect, store, manage, use and disclose personal information it collects from you. A copy of the Privacy Policy is available on our website or from us on request.

The Privacy Policy also contains information about how you can access and seek correction of your personal information held by Frais, how you can make a complaint to Frais about a breach of the Privacy Act 1988 (Cth) or any registered code under the Privacy Act that binds Frais, and how Frais will respond to and deal with such a complaint.

Frais may disclose your personal information to organisations involved in providing services to Frais, including share registries, settling agents, identity verification service providers, auditors, insurers, information technology or other professional or outsourced service providers, regulators including Australian Securities and Investment Commission, Australian Securities

Exchange and Australian Tax Office and to a party in compliance with a subpoena or court order.

Frais may disclose your personal information to overseas vendors or service providers for example for hosting and data storage service services. Without limiting the foregoing, your data may be disclosed by us to vendors in countries such as Canada, Hong Kong, India, Singapore, United Kingdom, and the United States of America.

For queries or information regarding privacy matters please contact our Compliance Officer, who can be contacted at compliance@FraisCapital.com.