

PRIVACY POLICY

ENRIZEN FINANCIAL GROUP PTY LTD



PRIVACY POLICY

November 2022

We are committed to protecting your privacy

This document outlines the policy on handling the personal information that Enrizen Financial Group Pty Ltd and its related companies (as outlined within the document) (hereafter “Enrizen” or “we”) collect about individuals and entities including customers and potential customers.

Enrizen recognises the importance of privacy and we are committed to protecting your personal information. We are required to comply with the Privacy Act 1988 (Cth) which provides for the fair handling of personal information, and sets standards for the collection, access, storage and use of personal information. Our policy for dealing with any personal information that you disclose to us is explained below.

ABOUT THIS PRIVACY POLICY

This Privacy Policy outlines how we manage your personal information. It also describes generally the types of personal information held, for what purposes, and how that information is collected, held, used and disclosed.

This Privacy Policy applies to all your dealings with us whether using the Enrizen website (www.enrizen.com.au or www.enrizencapital.com.au), in writing or in person. By dealing with Enrizen, you consent to our use and disclosure of your personal information in the manner described in this Privacy Policy. We encourage you to check our website regularly for any updates to our Privacy Policy.

WHY DOES ENRIZEN NEED YOUR PERSONAL INFORMATION?

Understanding and meeting our customers’ financial, business and legal needs over the course of their lifetime is a central part of our business. We do this by providing various services to you.

The types of services (“our services”) we provide include:

- General insurance;
- Financial planning;
- Finance broking;
- Lending and payment;
- Legal;
- Corporate advisory;
- Direct investment; and
- Accounting and taxation.

Enrizen collects, holds, uses and discloses its customers’ personal information to establish, manage and provide these services. We may also use and disclose personal information for related purposes, such as arranging for services to be provided by third parties and enhancing our customer service and product options (see the next section ‘Will my personal information be used for Direct Marketing?’).

In addition, we are required by law to collect some personal information. Such laws include (but are not limited to) the *AntiMoney Laundering and Counter-Terrorism Financing Act 2006 (Cth)*, the *Corporations Act 2001 (Cth)*, the *National Consumer Credit Protection Act 2009 (Cth)* and the *U.S Foreign Account Tax Compliance Act*.

Generally, the purpose for which Enrizen collect personal information will be apparent from the way in which we collect it, or will be disclosed at the time of collection. If at any time the purpose for which we are collecting your personal information is unclear, please raise your concerns initially with the person you are dealing with or direct your concern to our Privacy Officer.

By retaining our services, you provide your consent to Enrizen collecting and handling your Personal Information in accordance with this policy. Such consent may be withdrawn at any time upon written notice.



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WILL MY PERSONAL INFORMATION BE USED FOR DIRECT MARKETING?

We may also use and disclose your personal information to keep you informed about the range of services offered by Enrizen. Personal information of individuals is only used to market relevant products and services specific to that individual.

You can opt out of receiving direct marketing from us at any time (see the 'How can you contact Enrizen about privacy' section below).

Enrizen will not disclose your personal information to a third party for the purposes of direct marketing unless you have given your express consent for such disclosure and use.

WHAT HAPPENS IF I DO NOT PROVIDE INFORMATION THAT HAS BEEN REQUESTED?

It is your choice whether to provide your personal information. However, if you don't, we may be unable to fulfil your request for a specific product or service or may affect our ability to properly analyse your personal circumstances to effectively perform the services offered by Enrizen.

WHAT TYPES OF PERSONAL INFORMATION DOES ENRIZEN COLLECT?

We may ask for a range of personal information to assist us in providing you with relevant financial products and our services. Enrizen will not collect personal information unless the information is reasonably necessary for one or more of our functions or activities. The information we may request includes (but is not limited to) name, address, date of birth, contact details, income, credit and debit card or bank account information, assets and liabilities, tax and financial statements, health information, employment details, domicile and citizenship status.

DOES ENRIZEN COLLECT SENSITIVE INFORMATION?

We sometimes need to collect and use sensitive information, such as when we consider applications for some insurance and banking products, or when assessing a claim.

Sensitive information may include information or an opinion relating to a person's racial or ethnic origin, political views or memberships, religious beliefs or affiliations, membership of a professional or trade association or trade union, sexual orientation or practices and criminal record. It also includes information about a person's health and medical history.

The Australian Privacy Principles set out circumstances in which sensitive information may be collected and used.

Unless you give us your consent, or if we are required or permitted by law, we will only use or disclose sensitive information for the purposes for which it was provided.

DEALING WITH UNSOLICITED PERSONAL INFORMATION

Where it becomes apparent that a communication contains unsolicited personal information that would not otherwise be lawfully requested or used, Enrizen will make reasonable efforts to delete, destroy or de-identify the record of such personal information.

Where it is impracticable to delete, destroy or de-identify (for example, where the unsolicited information is combined with necessary information) the record will be retained. Enrizen will take all reasonable steps to protect the personal information against loss, unauthorised access, use, modification or disclosure, and against other misuse.



HOW DOES ENRIZEN COLLECT PERSONAL INFORMATION?

How we collect personal information also depends on the nature of your dealings with us. Enrizen will collect your personal information directly from you whenever it is reasonable and practical to do so. We gather this information either through applications or other forms that you complete, or by recording the information you provide via phone calls, interviews and other forms of communication such as via the internet or CCTV footage and Wi-Fi within Enrizen's offices.

We may also collect personal information from external sources (third parties). Examples of the people or organisations who may provide us with information are:

- employers, when a new employee joins their superannuation or insurance plan;
- parents or guardians in respect of children;
- people authorised by you (such as lawyers or accountants);
- other credit providers;
- public sources of information (such as telephone directories);
- market research organisations (through surveys or telephone polls);
- third-party brokers (such as insurance and mortgage brokers); and
- credit reporting bodies.

At or before the time or, if that is not practicable, as soon as practicable after, Enrizen collects personal information about you, Enrizen will take such steps as are reasonable in the circumstances to inform you of Enrizen's identity, its contact details and all relevant matters referred to in Australian Privacy Principles 5.

If you apply for a job with us, we will hold, use and disclose that information solely for the purpose of considering your application. In particular, in considering your application, it may be necessary for us to disclose some of that information to third parties to verify the accuracy of that information. In such circumstances, we will disclose only such information as is necessary in the circumstances. In considering your application, we may also collect personal information about you from any third parties that you nominate as your referees in your application.

CAN YOU REMAIN ANONYMOUS OR USE A PSEUDONYM WHEN DEALING WITH US?

We understand that anonymity is an important element of privacy and some members of the public may wish to be anonymous when interacting with us. We also understand some members of the public may wish to use a pseudonym. If you wish to remain anonymous or to use a pseudonym when dealing with us, we may be able to provide you with limited information or services, such as general details about our products.

However, in many cases it will be impractical for us to assist you if you wish to remain anonymous or use a pseudonym. For example, we are generally not permitted to issue a financial product to a person without first collecting their personal information. Further, the provision of many financial services is highly personalised, with the quality and scope of financial advice heavily dependent on the individual circumstances of each customer.

Because of this, if you choose not to identify yourself or wish to use a pseudonym, we may be unable to provide you with the specific product or service you want. It may also affect our ability to properly analyse your personal circumstances, so our recommendations may not be completely appropriate or suitable for you.

HOW DOES ENRIZEN PROTECT YOUR PERSONAL INFORMATION?

Enrizen is committed to keeping your personal information secure. Whether your personal information is gathered through face to face meetings or by interacting with us via telephone, mail, internet or other methods, we take reasonable steps to store your information securely. We hold your personal information in a combination of secure computer storage facilities, paper-based files and other formats.



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We take a number of steps to protect personal information from misuse, interference and loss, unauthorised access, modification or improper disclosure. These include instructing our staff and financial advisers who handle personal information to respect the confidentiality of customer information and the privacy of individuals.

All staff receive regular training regarding the obligation of Enrizen and its offices, obligations to observe the Australian Privacy Principles in their day to day practices and are provided with our privacy procedure that details what information is to be stored, disclosed or otherwise handled.

While Enrizen uses all reasonable endeavours to ensure that you provide personal information in a secure environment, no data transmission over the internet can be guaranteed as totally secure. Whilst Enrizen maintains regular and up to date security checks, it does not accept responsibility for the security of information transmitted to us over the internet.

Enrizen's website may contain links or plug-ins to other sites. We are not responsible for the content of or the privacy practices or policies of those sites.

WHO DOES ENRIZEN SHARE PERSONAL INFORMATION WITH?

From time to time we may share your personal information with other entities both within and outside of Enrizen. The entities that we might share your personal information with vary according to the product or service involved, but could include:

- other areas and organisations within Enrizen (those entities listed in the document) providing Our Services;
- external financial planners, brokers and other parties authorised by Enrizen;
- service providers and specialist advisers we engage to provide us with services such as administrative, financial, insurance or research services, some of whom may contact you on our behalf;
- investment managers, insurers, investment platform providers, premium funding providers and credit providers;
- courts, tribunals and other dispute resolution bodies in the course of a dispute;
- credit reporting or reference agencies or insurance investigators;
- employers contributing to superannuation plans;
- anyone authorised by you or to whom you have provided your consent (either expressly or impliedly), including but not limited to other financial service providers that we may need to deal with on your behalf;
- anyone to whom we, or our service providers, are required or authorised by law to disclose your personal information for example, law enforcement agencies, and national and international government and regulatory authorities including but not limited to the Australian Taxation Office, the Australian Prudential Regulation Authority, the Australian Securities and Investments Commission, the Australian Transaction Reports and Analysis Centre and the United States Internal Revenue Service; and
- other financial services institutions in order to detect, investigate or prevent actual or potential fraud in connection with the products or services we provide to you

In the event that Enrizen believes that the use or disclosure of the personal information is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of an enforcement body, Enrizen will make a written note of such use or disclosure.

IS ENRIZEN LIKELY TO DISCLOSE PERSONAL INFORMATION TO OVERSEAS RECIPIENTS?

Enrizen may share information with international recipients located in, or have operations in, other countries. In these circumstances and under strict control, Enrizen may authorise access to personal information by restricted persons in an overseas location for the purposes of providing you with services or in connection with the administration of Enrizen. Such countries might include, but are not limited to New Zealand, the United Kingdom, France, Germany, the United States of America, Papua New Guinea, China [Hong Kong], India, Philippines, Malaysia, Vietnam, South Africa and Canada.



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We take active steps to ensure that any external organisations with whom we share your personal information are subject to compliance with the Australian Privacy Principles or a commensurate policy and commitment to protect personal information.

Some financial planners or advisers of Enrizen may enter their own outsourcing arrangements to other countries. Those arrangements will be disclosed separately by the financial planner or adviser to their respective clients.

Please also note that personal information collected by one part of Enrizen may be shared with other companies in the Enrizen Financial Group for reasonable business purposes.

ENRIZEN'S ADOPTION, USE OR DISCLOSURE OF GOVERNMENT RELATED IDENTIFIERS

Enrizen may request, record and use government identifiers for legitimate purposes in the conduct of its business as permitted by law.

For example, an individual's tax file number may be sought, recorded and used to validly discharge taxation obligations. However, government identifiers will not be adopted as Enrizen's own identifier in respect of that individual.

HOW DOES ENRIZEN UPDATE PERSONAL INFORMATION?

We realise that your personal information changes frequently – people move house, change jobs and update other personal circumstances on an ongoing basis. Enrizen will take all reasonable steps to ensure that the personal information we hold is accurate, up-to-date, complete and relevant. Where Enrizen holds personal information about you and it is found that, having regard to a purpose for which the information is held, the information is inaccurate, out of date, incomplete, irrelevant or misleading, or you request that Enrizen correct the information, Enrizen will take such steps as are reasonably necessary to correct that information and to ensure that it is accurate, up to date, complete, relevant and not misleading.

Similarly, if Enrizen corrects personal information about you that was previously disclosed to a third party, Enrizen will take all reasonable steps to give notification to the third party of the correction.

If we believe the information we hold is incomplete or out of date, we may also seek to correct or complete our records by gathering data from other sources such as public records and other organisations.

In the event that Enrizen refuses to correct the personal information that you have requested, Enrizen will give written notice as to the reasons for refusal and mechanisms available for complaint.

HOW LONG WILL ENRIZEN KEEP YOUR INFORMATION?

We may be legally required to maintain some of your records for a significant period of time. However, once we believe information held by us is no longer needed we may remove any identifying details or destroy the records entirely.

HOW CAN YOU CONTACT ENRIZEN ABOUT PRIVACY?

You have the right to contact us to:

- seek more information about anything contained in this policy, or to request a copy of this policy in a different format;
- update or correct your personal information;
- opt out of receiving direct marketing material;
- ask about accessing or correcting the personal information we hold about you; or
- making a privacy related complaint, in

one of the following ways:

- by telephone: 1300 650 341;
- by email: enquiries@enrizen.com.au; or
- in writing: GPO Box 225, Sydney NSW 2001.



HOW DO I FIND OUT ABOUT AND/OR ACCESS THE PERSONAL INFORMATION ENRIZEN HOLDS ABOUT ME?

Under the Privacy Act you have the right to access the personal information we hold about you, with some exceptions. You can also request for us to correct any inaccurate, incomplete or out-of-date personal information. For security reasons, an access form outlining what information you require must be completed. Access forms can be obtained by contacting us as set out above.

Enrizen is permitted to refuse access to personal information in certain situations. Examples include (but are not limited to) where:

- giving access would have an unreasonable impact on the privacy of other individuals;
- giving access would be unlawful, or where denying access is required or authorised by and Australian law or a court order;
- information relates to existing or anticipated legal proceedings (and would not be accessible through process of discovery);
 - request for access is frivolous or vexatious;
- giving access would prejudice enforcement body related activities;
- giving access would reveal commercially sensitive information;
- both of the following apply;
 - o we have reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to our functions or activities has been, is being or may be engaged in; and o giving access would be likely to prejudice the taking of appropriate action in relation to the matter; or
- giving access is likely to interfere with law enforcement activities.

Enrizen will respond to a request for access within a reasonable period after the request is made and will give access to the information in the manner requested by the individual if it is reasonable and practicable to do so. Before providing the requested information we reserve the right to give you an estimate of any potential costs that would reasonably be incurred by Enrizen in retrieving archived data.

Upon Enrizen declining access to information because of one of the above conditions, it will take such steps as are reasonable in the circumstances to give access in a way that meets the needs of the entity and the individual. Similarly, Enrizen will provide reasons for the refusal and the mechanisms available for complaint.

WHAT SHOULD I DO IF I HAVE A COMPLAINT?

Your privacy is important to Enrizen and we will make every effort to resolve your concerns.

To raise any concerns you might have in relation to privacy, please contact us via the contact channels listed below this section. If you feel your complaint has not been satisfactorily addressed in the first instance, or that it is taking too long to resolve, you can ask for your concerns to be escalated to Enrizen's Privacy Officer.

We take privacy-related complaints very seriously and consider all complaints carefully as part of our commitment to being open, honest and fair in dealing with your concerns. In most cases, we'll contact you within five (5) working days of receiving your complaint to let you know what actions we are taking regarding the matter. If you are not satisfied with our handling of your complaint or we have not replied to you within a reasonable period of time, then you may be entitled under applicable law to make a complaint to the relevant regulator.



CONTACT CHANNELS

Enrizen Privacy Officer

| | | |
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| In writing: | or | by email: |
| Attn: The Enrizen Privacy Officer | | Attn: The Enrizen Privacy Officer |
| GPO Box 225 | | enquiries@enrizen.com.au |
| SYDNEY NSW 2001 | | |

If you still have concerns, further assistance may be available from:

| | | |
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| Australian Financial Complaints Authority (AFCA) | or | The Office of the Australian Information Commissioner |
| Website: www.afca.org.au | | Website: www.oaic.gov.au |
| Email: info@afca.org.au | | Email: enquiries@oaic.gov.au |
| Phone: 1800 931 678 (free call) | | Phone: 1300 363 992 |
| Mail: Australian Financial Complaints Authority GPO Box 3, Melbourne VIC 3001 | | |

WHAT ABOUT PRIVACY AND THE INTERNET?

This statement outlines some privacy issues specific to Enrizen's website.

INTERACTIVE TOOLS

Enrizen's website provides you with many interactive tools designed to help you make an informed choice with certain financial and other decisions. Some of these tools include budget planners, debt reduction calculators, home loan comparison, key factsheets and superannuation calculators.

Enrizen may collect personal information you enter when using the interactive tools on our website or through our applications.

WHAT IS A COOKIE AND HOW DOES ENRIZEN USE COOKIES?

We use cookies to monitor your use of our website, to observe behaviour, compile aggregate data and provide you with a more effective service. Cookies are small pieces of text stored on your computer to help us determine the type of browser and settings you are using, where you have been on the website, when you return to the website, where you came from, and to ensure your information is secure. The purpose of this information is to provide you with a more relevant and effective experience on Enrizen's websites, including presenting web pages according to your needs or preferences.

We use cookies to give you access to certain pages of the website without having to log in each time you visit. Enrizen may also use external service providers to track the traffic and usage on the website.

Cookies are frequently used on many websites and you can choose if and how a cookie will be accepted by changing your preferences and options in your browser. You may not be able to access some parts of Enrizen's websites if you choose to disable the cookie acceptance in your browser, particularly the secure parts of the website. We therefore recommend you enable cookie acceptance to benefit from all the services on the website.

LINKS TO THIRD PARTY WEBSITES

Enrizen's website has links to external third party websites that benefit the user.

External websites should contain their own privacy statements and we recommend you review them when using their websites. Please note, however, that third party websites are not covered by this policy, and these sites are not subject to Enrizen's privacy standards and procedures.



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ABOUT THIS POLICY

Any information we hold is governed by the most current Enrizen Privacy Policy. The policy is available via our website www.enrizen.com.au and www.enrizencapital.com.au, or you can contact us about obtaining the policy in different formats (see the 'How can you contact Enrizen about Privacy' section).

This policy is reviewed from time to time to take account for new laws and technology, and changes to our operations and practices, and to make sure it remains appropriate in the changing environment.

This policy applies to all Enrizen entities operating in Australia. These include:

- Enrizen Financial Group Pty Ltd
- Enrizen Pty Ltd (Australian Financial Services Licence & Australian Credit Licence Holder No. 403 905)
- Enrizen Accounting Pty Ltd
- Enrizen Capital Pty Ltd
- Enrizen Financial Planning Pty Ltd
- Enrizen Money Pty Ltd
- Enrizen Lawyers Pty Ltd
- Enrizen Services Pty Ltd

Certain Enrizen entities may adopt additional procedures relating to the collection and handling of personal information. Such documentation does not detract from the Enrizen policy and any intra-related procedures between the Enrizen entities are intended to be read together.

FURTHER INFORMATION ON PRIVACY

Further information may be obtained on privacy issues in Australia by visiting the Australian Information Commissioner's website at <http://www.privacy.gov.au>.



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