

PRIVACY POLICY

National Privacy Principles

Chancellor Hattersley Lloyd Pty Limited (Chancellor) is bound by the National Privacy Principles established under the Privacy Amendment (Private Sector) Act 2001. This Privacy Policy sets out Chancellor's commitment to those principles.

Chancellor values your privacy and so we welcome the Commonwealth privacy legislation which came into effect on 21 December 2001. We set out in this document how we handle your personal information as required under the privacy legislation's National Privacy Principles.

Chancellor requires each of its Representatives to adopt this Privacy Policy.

Collection

As a provider of investment advice and management services we are subject to certain legislative and regulatory requirements which necessitate us obtaining and holding detailed information which personally identifies you and/or contains information or an opinion about you. Our ability to provide you with comprehensive portfolio services and investment advice is dependent on us obtaining certain personal and sensitive information about you, which may include:

- employment details and employment history;
- details of your financial needs and objectives;
- details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, insurance cover and superannuation;
- details of your investment preferences and aversion or tolerance to risk;
- information about your employment history, employment circumstances, family commitments and social security eligibility; and
- health information

Chancellor Hattersley Lloyd is also required to collect and maintain identification documentation as part of compliance including the Anti-money laundering / Counter-Terrorism financing Act.

Failure to provide the personal and sensitive information referred to above may expose you to higher risks in respect of the recommendations made to you and may affect the adequacy or appropriateness of advice or financial service we give to you.

We will not collect any personal information about you except when you have knowingly provided that information to us or authorised a third party to provide that information to us.

Generally collection of your personal information will be effected in either face to face interviews, over the telephone, or by way of an online client engagement form. From time to time additional and/or updated personal information may be collected through one or more of those methods.

We may also receive information about you from another Licensee as a result of our provision of investment management support services, including the provision of services relating to brokerage payments and compliance support services. We take reasonable steps to make sure that you are made aware of our collection of information about you.

Use and disclosure

We will only collect, maintain and use Personal Information about you if it is necessary for us to adequately provide to you the services you have requested including:

- the preparation of your financial advice and investment strategy report;
- the provision of portfolio advice and services to you;
- making investment recommendations;
- implementing recommendations made to you;
- reviewing your financial strategy;
- reviewing investment recommendations;
- As part of Chancellor Hattersley Lloyds compliance with the Anti-money Laundering / Counter-Terrorism financial Act.

or to support those services offered to you by another Licensee.

We will not use or disclose Personal Information collected by us for any purpose other than:

- the purposes for which it was provided or secondary related purposes in circumstances where you would reasonably expect such use or disclosure; or
- where you have consented to such disclosure; or
- where the National Privacy Principles authorise use or disclosure where required or authorised under law, in circumstances relating to public health and safety and in connection with certain operations by or on behalf of an enforcement body.

We are required under the Financial Services Reform Act to maintain certain transaction records and make those records available for inspection by the Australian Securities and Investments Commission (ASIC).

We may disclose your personal information to your accountant, lawyer or other financial service provider where you have authorised such disclosure.

In the event that Chancellor may be approached by a potential new shareholder, we may disclose part of your personal information to that potential investor for the purpose of them conducting due diligence investigations. Any such 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. In the event that an investment in the business is effected, it may necessitate a transfer your personal information to that new investor.

Document security and storage

Your personal information is maintained securely and is generally held in your client file. Information may also be held in our computer databases. We will seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure.

In the event you cease to be a client of this organisation, any personal information which we hold about you will be maintained for a period of 7 years in order to comply with legislative and professional requirements, following which time the information will be destroyed.

Access and correction

You may request access to your personal information by contacting our Representative or Privacy Officer. We will (subject to the following exceptions) provide you with access to that information either by providing you with copies of the information requested, allowing you to inspect the information requested or providing you with an accurate summary of the information held. We will, prior to providing access in accordance with this policy, require you to provide evidence of your identity.

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 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.

In the event we refuse you access to your personal information, we will provide you with an explanation for that refusal.

We will endeavour to ensure that, at all times, the personal information about you which we hold is up to date and accurate. In the event that you become aware, or believe, that any personal information we hold about you is inaccurate, incomplete or outdated, you may contact our Representative, or Privacy Officer, and provide us evidence of the inaccuracy or incompleteness. We will, if we agree that the information requires correcting, take all reasonable steps to correct the information.

If we do not agree that your personal information requires correcting, we must, if you request, take reasonable steps to ensure that whenever your personal information is accessed or handled in the future, it is apparent that you are not satisfied as to the accuracy or completeness of that information.

We will endeavour to respond to any request for access within 14-30 days depending on the complexity of the information and/or the request. If your request is urgent please indicate this clearly.

Privacy Complaints

If you wish to complain about any breach or potential breach of this privacy policy or the National Privacy Principles, your complaint should be directed to our Privacy Officer, as detailed below. We will endeavour to resolve any complaint to your satisfaction. However, if we are unable to satisfactorily resolve your concerns you can contact the Office of the Privacy Commissioner who may investigate your complaint further.

Contact Details

Privacy Officer: *Mr Hamish Campbell, Executive Director*
Address: *Chancellor Hattersley Lloyd Pty Limited
Level 10, 52 Phillip Street, Sydney NSW 2000*
Telephone: *02 9300 3666*
Facsimile: *02 9300 3677*
Email: *chl@chancellor.net.au*

Changes to this Privacy Policy

We reserve the right to review and amend this Privacy Policy from time to time and to notify you.

Additional Privacy Information

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