

# **V J RYAN SECURITIES LIMITED**

## **PRIVACY POLICY**

**19 OCTOBER 2023**

Version 18	19 October 2023
Version 17	27 October 2022
Version 16	29 October 2021
Version 15	30 October 2020
Version 14	31 October 2019
Version 13	31 October 2018
Version 12	31 October 2017
Version 11	31 October 2016
Version 10	30 October 2015
Version 9	31 October 2014
Version 8	1 May 2014
Version 7	31 October 2013
Version 6	31 October 2012
Version 5	31 October 2011
Version 4	31 October 2010
Version 3	31 October 2009
Version 2	31 October 2008
Version 1	31 October 2007
Created	31 October 2006

## **PRIVACY POLICY**

VJ Ryan Co Securities Limited (**we, us, our**) respects your privacy and is committed to treating the personal information we collect in accordance with the Australian Privacy Principles in the Privacy Act 1988 (Cth) (Act) and the subsequent 2012 and 2016 amendments (Mandatory Data Breach Notification) and accordingly we will adhere to the Australian Privacy Principles (**APPs**) when collecting, using, disclosing, securing and providing access to personal information.

### ***The information we collect***

Whenever it is reasonable and practicable to do so, we only collect information about you directly from you or otherwise in accordance with this policy.

"Personal information" is information or an opinion, whether true or not and whether recorded in a material form or not, about an identified individual, or an individual who is reasonably identifiable.

In general, the main types of personal information we collect and hold includes (but is not limited to):

- Names
- Contact details
- Gender
- Dates of Birth
- Tax File Numbers
- Details of your financial circumstances, including bank account details and
- Complaint details.

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

We are authorised to collect TFNs by the *Income Tax Assessment Act 1936 (Cth)*. It is not compulsory for you to provide your TFN for our products and services, but if you do not, taxation law may require additional deductions to be made from amounts payable to you.

We do not generally collect sensitive information about you unless required by applicable laws or rules. Sensitive information includes information relating to:

- race;
- political or religious beliefs;
- sexual preferences;
- criminal convictions;
- membership of professional or trade associations or unions; and
- health information.

### ***Unsolicited personal information***

There may be times when we receive personal information that we do not solicit. If this occurs, we will determine if you have given your consent and the information is necessary for us to provide our products and services, or whether the collection is required or authorised by or under an Australian law or a court/tribunal order. If it is, the information will be dealt with in accordance with the APPs as if the information had been solicited.

If it is determined that we could not have obtained this information, we will destroy or de-identify the information as soon as practicable, provided it is lawful and reasonable to do so.

### ***How that information is used***

We only collect, hold and use personal information about you which is reasonably necessary to:

- open your account in the VJ Ryan Cash Management Trust;
- communicate with you and provide you quality products or services;
- consider applications and approaches you make to us;
- maintain your contact details; and
- meet our obligations under Government legislation.

We may also use your personal information for other directly related purposes.

You consent to us using your personal information in the above ways. We may collect, hold and use your personal information for other purposes not listed above. If we do so, we will make it known to you at the time we collect such information.

We will not use personal information provided by you to us in a manner inconsistent with the Act, the APPs or any other relevant laws or guidelines.

### ***Disclosing your personal information***

We do not sell personal information to other organisations.

We may disclose personal information to our service providers who provide services in connection with our products and services or we may provide information about you to our associated entities.

Generally, we will only disclose your personal information to these parties:

- for the purposes set out in this privacy policy or any agreement you enter into with us;
- in circumstances permitted by the APPs;
- if we are otherwise required or authorised by law, including without limitation the APPs under the Act; or
- if the disclosure is made with your consent.

### ***Protecting and maintaining the quality of personal information***

Protecting personal information is a priority to us. We take into account security and confidentiality when handling personal information in both the physical and electronic environment. We protect your information by using technical and physical security measures to reduce the risks of loss, misuse, unauthorised access, disclosure and alteration. Some of the safeguards we use are firewalls, virus scanning tools, data encryption and secure work environments.

If other organisations provide support services, we require them to appropriately safeguard the privacy of the information provided to them.

Where the personal information we collect is no longer required, we securely delete the information.

It is also important to us that the information we maintain and use is accurate, complete and up-to-date. If at any time personal details change, please let us know so we can update our records.

If you believe that personal information, we hold about you is incorrect, incomplete or inaccurate, then you may request amendment of it in writing. We will consider if the personal information requires amendment. In certain circumstances, we may also need to consult another party in order to respond to you.

If we are required to correct any of your personal information, we will take reasonable steps to correct the personal information within 30 days from the day on which the request is made or such longer period as you have agreed in writing. If we do not agree that there are grounds for amendment, we will provide you with our reasons why. If you are not satisfied with the outcome of your request, you can refer your request to the Australian Information Commissioner.

### ***How you can access your information***

You can contact us to request access to your information. In normal circumstances we will give you full access to your information. However, there may be some legal or administrative reasons to deny access. If access is denied, we will provide you with the reason why.

### ***Keeping personal information up to date***

We endeavour to ensure that the personal information we hold is accurate, complete and up-to-date. Changes inevitably are required and unfortunately errors do occur from time to time. You should contact us immediately in order to update any changes to the personal information we hold about you.

## ***Website & Cookies***

### ***When you visit our websites***

When you come to our websites (www.vjryancmt.com.au), we may collect certain information such as browser type, operating system, website visited immediately before coming to our site, etc. This information is used in an aggregated manner to analyse how people use our site, such that we can improve our product and service.

We may also collect personal information through applications for units and emails. You are not required to provide personal information via our website, however you may choose to do so. Information collected via our website is treated in accordance with this privacy policy.

### ***Cookies***

We may from time to time use cookies on our websites. Cookies are very small files which a website uses to identify you when you come back to the site and to store details about your use of the site.

Cookies are not malicious programs that access or damage your computer. Most web browsers automatically accept cookies but you can choose to reject cookies by changing your browser settings. However, this may prevent you from taking full advantage of our website. Our website may from time to time use cookies to analyse website traffic and help us provide a better visitor experience.

In addition, cookies may be used to serve relevant advertisements to website visitors through third party services such as Google AdWords. These advertisements may appear on our website or other websites you visit.

### ***Third party sites***

Our websites may from time to time have links to other websites not owned or controlled by us. These links are meant for your convenience only. Links to third party websites do not constitute sponsorship or endorsement or approval of these websites. Please be aware that we are not responsible for the privacy practises of other such websites. We encourage our unitholders to be aware, when they leave our website, to read the privacy statements of each and every website that collects personal identifiable information.

### ***Contact us***

If you would like to access the personal information that we hold about you, have a complaint or have any questions regarding our privacy policy or handling of information, please contact us:

**By phone**            9240 4900 or toll free 1800 092 762

**By facsimile**      9247 5930

**By email**            [vjryancmt@vjr.com.au](mailto:vjryancmt@vjr.com.au)

A copy of our privacy policy can be found on our website at [www.vjryancmt.com.au](http://www.vjryancmt.com.au).

### ***Changes to this privacy policy***

We are entitled to amend or modify this privacy policy at any time. Nothing contained in this policy is intended to create contractual rights or obligations.

### ***Document Review and Approval***

This document was approved by the Board of Directors of V J Ryan Securities Limited on 19 October 2023.

The date of the next review of this document is 31 October 2024 or such earlier date as may be required due to legislative changes/regulatory developments or for good governance.