



D R U M M O N D

CAPITAL PARTNERS

AFSL 534213

Privacy Policy

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1. Introduction

Drummond Capital Partners Pty Ltd (Drummond) is committed to protecting the privacy of personal information we handle. This Privacy Policy explains how we collect, hold, use and disclose personal information and how individuals can access and correct personal information or make a privacy complaint.

Drummond provides portfolio management services. Our core offering is a suite of model portfolios implemented as separately managed account (SMA) solutions on third-party investment platforms. These platform products may include investment accounts and, where applicable, superannuation and pension accounts. In some arrangements, Drummond may provide services as an asset consultant to third-party managed discretionary account (MDA) operators. Drummond does not act as the MDA operator.

Drummond is bound by the Privacy Act 1988 (Cth) (Privacy Act) and the Australian Privacy Principles (APPs). Where the Notifiable Data Breaches (NDB) scheme applies to Drummond, we handle eligible data breaches in accordance with Part IIIC of the Privacy Act (including notifying affected individuals and the Office of the Australian Information Commissioner (OAIC) where required).

2. Collection of information

2.1 Why do we collect your information

We collect personal information where it is reasonably necessary to provide portfolio management services, support platform implementation and reporting, respond to enquiries and complaints, maintain security and fraud controls, and comply with legal and regulatory obligations.

We may also use your personal information to provide market insights, newsletters, updates and event invitations and to inform you about products or services that may be relevant to you (direct marketing).

You can opt out of receiving marketing or promotional communications at any time by contacting our Privacy Officer (see section 9). Even if you opt out, we may still send essential service communications we are required (or reasonably need) to send.

Some laws may require or authorise us to collect and verify identity information (for example, where applicable under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)).

2.2 What information do we collect?

The types of personal information we may collect and hold depend on the service and channel involved and may include:

- identification and contact details;
- identity verification information (where required);
- investment and account-related information relevant to portfolio management and reporting;
- preferences and interests; and
- tax information such as TFN/ABN (where relevant).

Information may also, or instead, be collected by our third-party providers who operate, administrate, and promote our portfolio solutions. Each of these providers maintains their own Privacy Policy. We generally do not seek to collect sensitive information. If we do, we will only collect it where it is reasonably necessary and we have consent (unless an exception applies under law).

2.3 How do we collect information?

We may collect personal information about in a number of different ways including:

- from you, when you engage our firm so that we may provide you with one of our services
- from third parties, including service providers, other professionals, representatives or public sources
- when you attend our presentations
- when telephone, email or write to us or our service providers
- when you make contact with us to enquire about our services via a financial adviser
- when you subscribe or register to receive information or updates about our services
- when you access our website or tools

Where your personal information is collected by a platform, adviser, MDA operator or other third party, their privacy policy and collection notices apply to that collection and handling.

2.4 What if you do not provide the information we request?

You are not required to provide the personal information we request. However, if you do not provide information that is reasonably necessary, it may be impractical for us (or the relevant platform, MDA operator or service provider) to provide or support the relevant service.

2.5 What about unsolicited information?

If we receive personal information that we did not request and we determine it is not information we could reasonably have requested, we will destroy or de-identify it as soon as practicable, where lawful and reasonable.

3. Disclosure of information

3.1 Who do we disclose your personal information to?

We may disclose personal information to third parties where it is necessary to provide services and meet legal obligations. This may include but is not limited to:

- platform operators, custodians, trustees, responsible entities and administrators (as applicable);
- MDA operators (where you access services through an MDA);
- IT and cloud service providers;
- professional advisers;
- auditors and insurers; and
- regulators and dispute resolution bodies.

We do not sell, exchange, trade or otherwise supply third parties with any personal information obtained from you.

3.2 Will my information be disclosed overseas?

We may use service providers or systems that involve processing or storage outside Australia (for example, cloud technology used for transmission and/or storage). Before disclosing personal information overseas, we take reasonable steps to ensure the overseas recipient does not breach the APPs, or another permitted basis applies (such as informed consent).

4. How we keep your personal information secure

We take the security of personal information seriously and take reasonable steps to protect personal information from loss, misuse, interference and unauthorised access, modification or disclosure. Our safeguards are designed to be proportionate to the nature of the information and the way we deliver our services.

Security measures may include (where appropriate):

- access controls and authentication (including multi-factor authentication);
- user access management and segregation of duties; encryption and secure data transfer methods;
- logging and monitoring;
- secure disposal and destruction processes; and
- staff training and confidentiality requirements.

We may use third-party service providers (including cloud and technology providers) to host or process information. Where we do, we take reasonable steps to select reputable providers and to require appropriate confidentiality and security protections.

While we take reasonable steps to protect personal information transmitted via email, websites or online services, no method of transmission over the internet can be guaranteed to be completely secure. Once we receive your transmission, we take reasonable steps to protect it in accordance with this Policy.

We have an obligation to report data breaches to the Office of the Australian Information Commissioner (OAIC) in certain circumstances. In the unlikely event that we have to notify the OAIC we will also notify the individuals affected

5. Website and cookies

When you access our website, we may collect other information and data about you, which is not personal information. A cookie is a small text file sent to the user's browser that allows the web page server to retrieve information from the computer. Cookies can either be temporary session cookies or stored permanently on a computer. Cookies are used for a range of purposes, including security, identifying information, products or services which may be of interest to you and personalising promotional services.

Cookies are used to recognise your browser or device, receive and store certain types of information whenever you interact with us or third parties that use our services. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them. In addition, you are able delete or clear existing cookies that you have previously accepted.

6. Help us ensure information is accurate

We take reasonable steps to ensure personal information we hold is accurate, up to date, complete and relevant. If you believe the information we hold about you is incorrect or out of date, please contact us using the details in section 9.

7. Access and correction

You may request access to personal information we hold about you and request correction if you believe it is inaccurate, out of date, incomplete, irrelevant or misleading. We may need to verify your identity before providing access.

We aim to respond to access and correction requests within 30 days where practicable. If we correct personal information that we have previously disclosed to another entity, we will take reasonable steps to notify that entity of the correction within a reasonable period (unless impracticable or unlawful).

8. How long we keep personal information

We retain personal information only for as long as needed for the purpose it was collected or as required by law and recordkeeping requirements. When personal information is no longer required and it is lawful and reasonable to do so, we take reasonable steps to destroy or de-identify it.

9. Contact details and making a complaint

If you have a question, request or complaint about privacy, please contact our Privacy Officer:

Drummond Capital Partners Pty Ltd

Email: enquiries@drummondcp.com

Phone: (03) 9131 8500

Mail: Attention: Privacy Officer
Level 11, 55 Collins Street,
MELBOURNE VIC, 3000

If you believe that we have mishandled your personal information and breached the Australian Privacy Principles, you may lodge a complaint with our Privacy Officer using the contact details above. We will endeavour to resolve this within 30 days. Under s36(3) of the Privacy Act, this must be in writing.

In the event we are unable to resolve your issue, you may lodge a complaint with the Information Commissioner. Office of the Australian Information Commissioner via telephone 1300 363 992 or online at www.oaic.gov.au or by writing to the OAIC at GPO Box 5218 Sydney NSW 2001.

10. Changes to this policy

We may update this Privacy Policy from time to time. The most current version will apply to how we handle personal information and will be made available on our website or upon request.