



PRIVACY POLICY

VERTICAL CAPITAL MARKETS PTY LTD
TRADING AS VFS GROUP

ABN 11 147 186 114 · AFSL 418418

1. Who are and what this policy covers

This Privacy Policy is issued by Vertical Capital Markets Pty Ltd (ABN 11 147 186 114) trading as VFS Group ("VFS Group", "we", "us"). VFS Group holds Australian Financial Services Licence and Australian Credit Licence number 418418.

This policy applies to all personal information collected and held by VFS Group in connection with any of our services, including financial advice, managed discretionary account (MDA) services, mortgage and finance broking, and our self-directed trading platform offered under partner brand names. Where you access our self-directed platform under a partner brand, this policy governs how VFS Group handles your personal information under that brand.

It explains how we collect, hold, use and disclose personal information, how you can access and correct the information we hold about you, and how you can make a privacy complaint.

We review this policy from time to time to take into account new laws and changes to our operations and practices. Any personal information we hold is governed by the most recent version of this policy, which is available at www.vfsgroup.com.au or on request.

2. Our commitment

It is VFS Group's policy to respect the confidentiality of information and the privacy of our clients and individuals we deal with. VFS Group treats all personal information in accordance with the Privacy Act 1988 (Cth) (Privacy Act) and the Australian Privacy Principles (APPs), on which this policy is based.

Where we handle credit-related personal information in connection with our credit assistance services, we also comply with Part IIIA of the Privacy Act and the Privacy (Credit Reporting) Code (see section 8).

3. Personal information we collect

Due to the nature of the financial products and services we provide, and the government regulations and taxation laws that apply to them, we need to collect personal information from our clients. Depending on the services you use, this can include:

- identity information – your name, date of birth, residential address, contact details and identity documents (we are required to verify your identity under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006);
- financial information – income, assets and liabilities, account balances, trading and account statements, tax and financial statements, superannuation details and employment details;
- your investment objectives, financial situation, needs and risk profile, where we provide personal advice or MDA services;
- tax file numbers, where required for account establishment, handled in accordance with the Privacy (Tax File Number) Rule 2015;
- credit information, where you use our mortgage or finance broking services (see section 8); and
- records of our communications with you, including telephone, email and written instructions.

Most of the personal information we collect is obtained directly from you — through application and onboarding forms (including our online onboarding forms), meetings, and from maintaining records of information obtained in the course of providing our products and services. We may also collect information from third parties, including platform providers and custodians, product issuers, your accountant, lawyer or other advisers where you have authorised them to deal with us, publicly available sources, and credit reporting bodies (with your consent, in connection with credit assistance).

We may from time to time collect information voluntarily through market research, surveys or special offers. We may use this information to improve our product and service offerings and to consider the wider needs of our clients or potential clients.

If you do not provide the information we request, we may be unable to provide you with the product or service you have asked for, and in some cases we are prevented by law from doing so (for example, where we cannot verify your identity).

4. How we use your personal information

We collect, hold and use your personal information to:

- establish and manage your accounts, including opening and operating accounts with platform providers and custodians;
- provide our services to you, including financial advice, MDA services, access to our self-directed trading platform, and credit assistance;
- review your ongoing needs and conduct portfolio and advice reviews;
- process fees and payments you have authorised, including amounts you direct us to collect and remit to third parties on your instruction;
- comply with our legal and regulatory obligations, including under the Corporations Act 2001, the Anti-Money Laundering and Counter-Terrorism Financing Act 2006, the National Consumer Credit Protection Act 2009 and taxation law;
- manage complaints and disputes and improve our customer service and products; and
- tell you about products, services and information we believe may be useful to you (see section 9 – you can opt out at any time).

5. Who we disclose your personal information to

Subject to any restrictions that apply to sensitive information, we may disclose your personal information to:

- platform providers and custodians who hold or administer your investments – including Interactive Brokers, Netwealth Investments, Macquarie Investment Management and Bond Street Custodians, BT Portfolio Services and HUB24 Custodial Services;
- other companies or subsidiaries associated with VFS Group that provide financial and other services;
- financial institutions, product issuers and other organisations that VFS Group deals with in the course of providing its products and services, or that are nominated by you;
- third parties you direct us to pay or deal with – for example, where you direct us to collect and remit fees to an education provider with whom you have a separate agreement;

- service providers we engage to support our business, such as IT, software, cloud hosting, online form and document platforms, mail houses and secure archive and destruction services;
- our auditors and legal and compliance advisers;
- regulators, government agencies, courts and law enforcement bodies where required or authorised by law, including the Australian Securities and Investments Commission, AUSTRAC and the Australian Taxation Office; and
- credit reporting bodies, lenders and mortgage aggregators, where you use our credit assistance services (see section 8).

We generally require that organisations not associated with VFS Group but contracted to provide a service to VFS Group, and which handle or obtain personal information, acknowledge the confidential nature of that personal information and undertake to respect client privacy and comply with the Australian Privacy Principles, the Privacy Act, and VFS Group's Privacy Policy.

6. Overseas disclosure

Some of the organisations we disclose personal information to are located, or store or process data, outside Australia. In particular:

- Interactive Brokers is a global broking group. Where your account is held with Interactive Brokers, your personal information will be disclosed to Interactive Brokers group entities located in the United States and other jurisdictions in which the group operates; and
- some of the software and cloud service providers we use store or process data in the United States and other overseas locations.

Where we disclose personal information to overseas recipients, we take reasonable steps to ensure the recipient handles it in a manner consistent with the Australian Privacy Principles, or the disclosure is otherwise permitted under the Privacy Act — for example, where you have consented, or where the disclosure is necessary to provide the service you have requested.

7. Restrictions on sensitive information

Certain information we hold is sensitive; this includes tax statements and information received from credit reporting bodies about an individual. The use of such information may also be restricted by law. Sensitive information may be used by VFS Group in the process of assessing creditworthiness and applicant suitability. It is VFS Group's policy that sensitive information collected will be used and disclosed only for the purposes for which it was obtained, unless the client agrees otherwise or the use or disclosure of this information is allowed by law.

8. Credit reporting

VFS Group provides credit assistance (mortgage and finance broking) under its Australian Credit Licence. When you use these services, we may collect, hold, use and disclose credit information and credit eligibility information about you, including your identity details, details of credit you have applied for or hold, repayment history information, financial hardship information, defaults and serious credit infringements, and information derived from credit reports.

We may obtain this information from, and disclose it to, credit reporting bodies, lenders and mortgage aggregators for the purposes of assessing your application for credit, assisting you to apply for credit, and managing that process. The credit reporting bodies we may deal with are Equifax, illion and Experian. Each credit reporting body has a policy explaining how it manages credit-related personal information, available on its website.

You have the right to access the credit eligibility information we hold about you, to request that we correct it, and to complain about our handling of it. You may also ask a credit reporting body not to use your credit reporting information for pre-screening of direct marketing by credit providers, and to place a ban on your information if you reasonably believe you have been, or are likely to be, a victim of fraud.

9. Direct marketing

We may contact you by phone, email, SMS or post to tell you about products, services and information that we believe may be useful to you. You can opt out of receiving marketing communications at any time by using the unsubscribe facility in the communication or by contacting us using the details in section 16. We do not sell your personal information.

10. Managing, storing and retaining personal information

All of our employees who handle personal information are trained to respect the confidential nature of client information and the privacy of individuals. Breaches of your privacy are taken very seriously and may result in disciplinary action, including dismissal. VFS Group has a Privacy Officer who ensures that all personal information collected is managed in accordance with this policy, the Australian Privacy Principles, and the Privacy Act.

Ensuring that the personal information you provide us is appropriately safeguarded is extremely important to us, whether you communicate with us personally, by phone, mail, email, over the internet, or in any other electronic form. We hold your personal information in secure computer and cloud storage facilities and in paper-based files, and take steps to protect it from misuse, interference, loss, and unauthorised access, modification or disclosure.

We are required by law to retain records for significant periods – the Corporations Act, the Anti-Money Laundering and Counter-Terrorism Financing Act and taxation law generally require records to be kept for at least seven years. When we consider information is no longer required, and any legal obligations that apply to it have been met, we will de-identify the information or securely destroy the records.

11. Notifiable data breaches

VFS Group is subject to the Notifiable Data Breaches scheme under the Privacy Act. If we suspect that a data breach involving personal information we hold has occurred, we will promptly assess it. If we determine that the breach is likely to result in serious harm to any affected individuals and cannot be remediated, we will notify the affected individuals and the Office of the Australian Information Commissioner (OAIC) as required by law.

12. Keeping your personal information accurate and up-to-date

We aim to ensure that all personal information we hold is accurate and up-to-date. We understand that information changes frequently with changes in address and other personal circumstances. In some circumstances, we will be able to update your personal information over the telephone. Please let us know promptly if your details change.

13. Accessing and correcting the personal information we hold about you

The Privacy Act gives you the right to obtain a copy of the personal information we hold about you and to advise us of any perceived inaccuracies, subject to some exceptions under the Act. To request a copy of the information we hold about you, we require that you complete a request form verifying your identity and specifying what information you require. Your request will be acknowledged within 14 days and responded to promptly, and in any event within 30 days. There is no fee for making a request or for correcting your information; however, we may charge a reasonable fee to cover the cost of locating, retrieving, reviewing and copying the information you request. Should you require extensive information, we will provide you with an outline of the likely cost before processing your request, to help you refine it if required.

14. Website, cookies and links to other sites

VFS Group may collect personal information from you when you use our website, www.vfsgroup.com.au, or the websites of our partner brands. Cookies are used on our websites to give you access to certain pages without having to log in each time, and to help us understand how our websites are used. Cookies are small strings of text stored on your computer that help us determine the type of browser and settings you are using, where you have been on the website, when you return, and where you came from, and to help ensure the information you provide us is secure. You can choose if and how a cookie will be accepted by changing the preferences and options in your web browser; parts of our website may not be accessible if you disable cookies.

We may also use independent external service providers to measure website traffic and usage and to support our advertising, such as Google Analytics and Meta Pixel. These providers may collect information about your use of our website and other websites using cookies and similar technologies.

From time to time we may place links on our website to external third-party websites that we consider may be of benefit to you. Third-party websites are not covered by our Privacy Policy. If you elect to link to the website of a third party, you may be asked to provide registration or other information; please note that the information you are providing may be collected, and you should familiarise yourself with the Privacy Policy adopted by that third party.

15. Complaints

If you feel that VFS Group, its employees, or service providers have breached this Privacy Policy or the Australian Privacy Principles, or have not respected your privacy, we encourage you to lodge a complaint. You may refer your complaint to our Privacy Officer, who will review your complaint and promptly act upon it. Our Privacy Officer may be contacted on 1300 220 360, by email to info@vfsgroup.com.au, or alternatively by writing to: The Privacy Officer, Vertical Capital Markets Pty Ltd, PO Box 7110, Warringah Mall NSW 2100.

If you are not satisfied with our response to your complaint, you may refer your complaint to the Office of the Australian Information Commissioner (OAIC). For more information about how you may lodge a complaint with the OAIC, please contact the Commissioner's hotline service on 1300 363 992 or +61 2 9284 9749 (if outside Australia), or visit www.oaic.gov.au.

If your complaint relates to credit-related personal information, you may also refer it to the Australian Financial Complaints Authority (AFCA), of which VFS Group is a member. AFCA can be contacted on 1800 931 678 or at www.afca.org.au

16. Contacting us

Should you wish to make a general enquiry about our Privacy Policy, update the personal information we hold about you, or obtain an application form for access to your personal information, you can contact us:

In writing: Vertical Capital Markets Pty Ltd
PO Box 7110
Warringah Mall NSW 2100

Telephone: 1300 220 360

Email: info@vfsgroup.com.au

