



Privacy Policy current as of 24 June 2025

Yarra Wealth Pty Ltd (**YW**) (ABN 68 513 065 643) is a Corporate Authorised Representative of MWH Capital Pty Ltd (AFSL 338141, ABN 64 136 888 956).

Your privacy is important to us. This Policy is aligned with the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**). It sets out the key points about how Yarra Wealth may collect, use, and manage personal information.

This Policy is published on Yarra Wealth's website (www.yarrawealth.com) and will be updated periodically and may be done so without notice. You should regularly review this Policy.

Please contact us if you would like to receive a copy of this Policy.

Respecting Your Privacy

Yarra Wealth) understands that you are concerned about how we deal with your private and financial information. Our aim is to deliver the best possible service and we will only collect the information necessary to enable us to do so.

Yarra Wealth's websites will not collect information about individuals using our websites except where it is knowingly provided.

In order to provide financial services to our investors, we need to request and retain some personal information. This allows us to process applications, administer your accounts and provide you with information. We may also use your personal details to communicate with you about products and services and comply with relevant laws. We consider all information about our investors to be private and confidential.

These laws regulate the way organisations:

- collect;
- use;
- disclose;
- keep secure; and
- give people access to their personal information, (that is, information about an individual that identifies them).

How We Collect Your Personal Information

Wherever practicable, Yarra Wealth will collect information about you directly from you. We generally collect your information when you complete the Application Form in our Product Disclosure Statement. We may also collect information directly from you on the phone or via electronic means such as an email.

However, it may be necessary at times to collect information about you from other external sources, such as:

- your accountant;
- your authorised representatives, such as executors or administrators; and
- identity verification service providers.

The Purposes for which Personal Information is Collected, Held, Used and Disclosed

Under the AML/CTF Act, Yarra Wealth is required to collect and verify (through identification documents such as a passport or driver's licence) its clients' names, addresses, and dates of birth. If clients do not provide Yarra Wealth with all or part of the information requested, we may not be able to provide the products or services in question.

Generally, we only use and disclose information about you for the purpose for which it was disclosed to us or related purposes which would reasonably be expected. Those purposes include:

- to establish and administer your investment accounts and your relationship with us;
- to communicate with you;
- to enable us to inform you about new and existing products and services that will enhance our relationship with you. However, we do respect your right to ask us not to do this;
- to comply with our reporting and tax obligations;
- where relevant and applicable, to provide you with financial services and advice; and
- to handle any relevant enquiries or complaints.

What Kind of Information Will We Collect and Hold

In order to establish and administer your account, and to comply with relevant legislation, we may collect all or some of the following:

- your full name, date of birth, gender and contact details including telephone, address, e-mail and fax;
- copy of your driver's licence and /or passport for the purpose of verifying your identity and to ensure compliance with the Anti-Money Laundering and Counter-Terrorism Financing Act;
- your tax file number and bank account details for the purpose of administering your accounts;
- international tax residency information;
- details about authorised signatories;
- copies of any relevant trust deeds, partnership agreements, constitutions or articles of association, which may be relevant to comply with the Anti-Money Laundering and Counter-Terrorism Financing Act; and
- details of services you are interested in and about your investment needs, for the purpose of gathering demographic information.

Anonymity and not providing requested information

The Privacy Act permits you to remain anonymous or use a pseudonym in certain dealings with Praemium. For example, you may choose not to provide your name or contact details when enquiring about a Praemium service or product. However, this option will generally not be available when you wish to use a Praemium product or service as we are required by law to establish the identity of anyone doing so.

You may also choose not to provide Praemium with certain pieces information that we have requested. If you do so:

- We may not be able to process or accept applications from you and may not be able to fulfil our obligations to you.
- You may be prevented from using our products or services, or you may not be able to access a third-party product or service administered by us or our platform service providers;
- We may not be able to process your requests or instructions in a timely manner, or at all; or
- There may be financial implications (e.g. tax treatment or delays in processing market sensitive instructions).

How We Store Your Personal Information

We store your personal information in a variety of ways which includes both electronic and paper form. The security of your personal information is paramount, and we take reasonable steps to protect it from misuse, interference, loss, unauthorised access, modification or disclosure. We do this in several ways including:

- Document security policies;
- Confidentiality requirements of our employees and contractors;
- Security measures for access to our systems
- Restricting access to personal information only to persons who require access to carry out their responsibilities;
- Secured access to our offices; and
- Electronic security systems such as firewalls and data encryption on our websites.

To Whom May We Disclose Your Information

There are circumstances under relevant legislation where we are required to disclose certain information and there are other circumstances where some information may also be provided.

We may be required by law to disclose your personal information. For instance, we may be required to provide details to:

- Australian Government regulators such as the Australian Securities and Investments Commission (ASIC), the Australian Tax Office (ATO), the Australian Transaction Reports and Analysis Centre (AUSTRAC), and to other regulatory or government entities;
- Australian Financial Complaints Authority (AFCA);
- as required by a court order; and
- your spouse in accordance with the Family Law Act requirements.

In order to meet your needs and provide some investor and financial services, such as administering your accounts, it may be necessary to release information or provide access to external service providers, for instance:

- organisations involved in providing, managing or administering our products or services such as administrators, third party clearers, mail houses and software providers;
- contractors we have engaged to assist us in managing your accounts;
- auditors, consultants and other professional advisers;
- your financial adviser;
- fund (administrator or trustee) to which your investment balance is to be transferred;
- your Legal Personal Representative, attorney or any other person who may be entitled to receive your account balance following your death and any person contacted to assist us in that process;
- other financial institutions (such as banks) who hold an account in your name, for example, where amounts have been transferred to or from that account;
- authorities investigating (or who could potentially investigate) alleged fraudulent or suspicious transactions in relation to your account.

We may also provide some information to market research companies for the purpose of analysing our client base. We may provide our clients' contact details to market research companies to undertake research on behalf of Yarra Wealth. For example, we may run investor satisfaction surveys, or run focus groups on proposed products or services. These agencies must return all records of this information to Yarra Wealth. Yarra Wealth retains ownership of this information and will ask you if you do not wish to receive further information. You can contact us at any time if you no longer wish us to contact you for marketing purposes.

Cross Border Disclosure

Some of the software systems that our platform service provider Powerwrap Ltd (**PWL**) (ABN 67 129 756 850), a wholly owned subsidiary of Praemium Ltd. (**PPS**) (ABN 74 098 405 826) uses involve personal information being transferred to and held in data centres in jurisdictions outside of Australia. Powerwrap or Yarra Wealth may disclose your information to related overseas entities for the purpose of providing internal support for our service and product offerings.

In addition, Powerwrap or Yarra Wealth may disclose certain information where the disclosure is required or permitted by law. For example, the Foreign Account Tax Compliance Act (FATCA) and Common Reporting Standards (CRS) requires us to collect and provide information about foreign investors who have investments in our products. This information is lodged with the Australian Taxation Office which may ultimately pass it on to the US Government's Internal Revenue Service or the relevant foreign taxation authorities.

Where you instruct us to invest in international assets or administer international non-custodial assets, we may be required to share your personal information with overseas recipients. We will take reasonable steps to ensure that overseas recipients do not breach the APPs, or the overseas recipients are subject to laws which protect personal information in a way which is comparable to the protection provided by the APPs. However, neither Yarra Wealth nor Powerwrap is responsible for, and cannot be held liable for, how these overseas recipients use your personal information.

Powerwrap's Privacy Policy is published on Praemium's website (<https://www.praemium.com>) and will be updated periodically and may be done so without notice.

Tax File Numbers (TFN)

There are legally binding guidelines relating to the collection, storage, use, disclosure, security, and disposal of individuals' TFN under the Privacy Act, the *Taxation Administration Act 1953* (Cth), the *Income Tax Assessment Act 1936* (Cth) the *Superannuation Industry (Supervision) Act 1993* (Cth) and the *Retirement Savings Accounts Act 1997* (Cth).

TFN are used to facilitate the effective administration of taxation law and certain aspects of superannuation law. Yarra Wealth, a TFN recipient, will only record, collect, use, or disclose TFN information where this is permitted under taxation or superannuation law. An individual's TFN cannot be used to assist with identification of individuals for any other purpose.

Only Yarra Wealth employees who need to handle TFN information will be given access to this information.

Data Quality – Keeping Your Personal Information Up to Date

Yarra Wealth relies on the accuracy of the personal information provided by its clients. We aim to ensure that it is accurate, up-to-date and complete. If any of your details change, or you have any concerns regarding its accuracy you should contact us immediately.

How an Individual May Access Their Personal Information and Seek Its Correction

You may request access to any personal information we hold about you. We reserve the right to charge a reasonable fee to cover our costs. Generally, if it is incorrect, we will correct it at your request. However, this is subject to some exceptions allowed by law, for example:

- if access to information would pose a serious threat to the life or health of an individual;
- if access to information would have an unreasonable impact on the privacy of others;
- if the request is frivolous or vexatious;
- if the information relates to a commercially sensitive decision-making process;
- if providing access would be unlawful;
- if access would prejudice enforcement activities relating to criminal activities or a security function;
- if providing access would reveal the intentions of Yarra Wealth in relation to negotiations with you in such a way to prejudice those negotiations;
- denying access is required or authorised by or under law.

If access is denied, we will provide you with the reason why.

To contact us about access to and correction of your personal information, please contact us (see contact details at the end of this document).

Complaints about a Breach of the Australian Privacy Principals

If you are not happy with our handling of your financial affairs from a privacy perspective, you can seek to have the issue(s) addressed.

You should initially contact Yarra Wealth in writing with the details of your complaint, together with the rectification you are seeking.

If you are not satisfied with our response after 30 business days, you may in some circumstances, take your complaint to:

Australian Financial Complaints Authority
GPO Box 3
Melbourne VIC 3001
(Australia)

Telephone: 1800 931 678

Finally, if you are also not happy with the outcome of the hearing from the Australian Financial Complaints Authority, you may take your complaint to the Office of the Australian Information Commissioner;

Enquiries telephone: 1300 363 992
Enquiries email: enquiries@oaic.gov.au
Sydney Office
GPO Box 5218 Sydney NSW 2001

Contacting Yarra Wealth

If you have any questions relating to this privacy statement, or concerns about the way in which we have handled your personal information, please do not hesitate to contact us;

The Privacy Officer
Yarra Wealth
C/- Powerwrap Limited
PO Box 16071
Collins Street West VIC 8007
Tel: 61-3-8681 4600
email: compliance@praemium.com.au