



Linear Privacy Policy

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PRIVACY POLICY – LINEAR GROUP

At Linear, we understand your concerns about privacy and the security of your personal information. We are committed to protecting all personal information about you that we hold. This Policy describes how we manage your personal information and safeguard your privacy.

Linear abides by the *Privacy Act 1988* (Privacy Act) and we comply with the Australian Privacy Principles established under the *Privacy Amendment (Enhancing Privacy Protection) Act 2012*. A summary of the Australian Privacy Principles is available at www.oaic.gov.au.

About this policy

This privacy policy (Policy) applies to any personal information collected by the Linear group, which includes Linear Asset Management Ltd and Linear Administration Services Pty Ltd and its related bodies corporate (referred to in this Policy as 'Linear').

What is personal information?

Under the Privacy Act, 'personal information' means information or an opinion about an identified individual, or an individual who is reasonably identifiable from their information. The information or opinion will still be personal information, whether it is true or not and whether it is recorded in a material form or not.

Collection of solicited personal information by Linear

As a financial services organisation we are subject to certain legislative and regulatory requirements which require us to obtain and hold detailed personal information.

In order to carry out the functions and services offered by Linear and its related bodies corporate, it is necessary to collect sufficient information to ensure we can appropriately perform those services and functions.

The kinds of information we collect and how we collect it

The kinds of personal information we collect and hold will depend upon the type of products and services you request from us as trustee or responsible entity, or that we facilitate as administrator. Generally we will collect your personal information directly from you, for example, if you call us, visit our website or apply for or access our products and services electronically.

From time to time we may collect personal information from other people or organisations without your involvement, for example, from publicly available sources of information, your representatives, including your personal financial adviser, legal adviser and attorney, your employer, other organisations who provide services and products to you, and to insurers and associated entities.

The kinds of information we collect may include:

- Information you give us when you request a product or service from us, or a third party gives us to arrange a product or service on your behalf. This information will include your name, address, date of birth and contact details.
- Financial information about you such as your investment portfolio, financial position and information from other sources.
- Your tax file number.
- Communications between us and your adviser and you and your adviser.
- Transactional information about any products you may hold, either with us or, if transitioning a product, with a third party.

The collection of sensitive personal information is restricted under the Privacy Act. This includes information about your religion, racial or ethnic origin, political opinions, criminal record and sexual orientation. It also includes health information.

Linear only collects sensitive personal information that is directly related to one or more of its functions. For example, sensitive information may be collected for the purposes of customer identification and verification under the Anti-Money Laundering and Counter-Terrorism Financing laws, or if you apply for insurance offered within a superannuation product.

Linear's use and disclosure of personal information

We generally collect, use, hold and disclose personal information to provide you (and/or entities associated with you) with products and services. 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 Australian Privacy Principles authorize use or disclosure where required or authorized 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 obliged pursuant to the Corporations Act to maintain certain transaction records and make those records available for inspection by the Australian Securities and Investments Commission.

It is possible that we may use your information to comply with other legislative and regulatory requirements in any jurisdiction, or to prevent fraud, crime or other activity that may cause harm in relation to our products or services and to help us run our business.

We may use the personal information collected from you for the purpose of providing you with direct marketing material such as articles that may be of interest to you, however you may request not to receive such information by sending an email to the address below and we will give effect to that request free of charge. Please allow two weeks for your request to be actioned.

We may disclose your personal information to superannuation fund trustees, insurance providers, investment managers and other product issuers for the purpose of giving effect to your investment instructions.

We may disclose your personal information to external contractors, including overseas contractors, for the following purposes:

1. maintenance of our software database and data storage.
2. provision and maintenance of accounting, banking and financial services to Linear.

It is a condition of our agreement with each of our external contractors that they adopt and adhere to this Policy or have a policy in place that complies with the Australian Privacy Principles. If you have any concerns in this regard, then you should contact us.

Dealing with unsolicited personal information

If we receive personal information from you that in our opinion we do not believe is reasonably necessary for us to undertake the services and functions we provide, Linear will, within 14 days after receiving the information, de-identify and destroy the information.

Pseudonymity and Anonymity

When contacting Linear, you generally have the right to remain anonymous (nameless) or to use a pseudonym (fictitious name) to protect your identity. However, if you wish to make enquiries about a specific account, we may need to identify you first, before we can lawfully disclose personal information.

Security of your personal information

Linear generally holds the information electronically and it is stored in secure data centres which are owned by external service providers and are located in Australia. Some personal information we hold is stored in paper files.

We use a range of physical and electronic security measures to protect the security of the personal information we hold, in order to seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorized access, modification or disclosure.

In the event you cease to be a client of Linear, any personal information we hold about you will be securely maintained for a period of seven years, following which time the information will be destroyed.

Do we disclose personal information overseas?

We may disclose your personal information to a recipient which is located outside Australia. This includes our service providers which may be located in the United States. For international transactions, we may need to disclose your information to the corresponding international party in order to process the transaction. The countries we disclose your information to will depend on the details of the transaction you ask us to carry out.

Our website

We will collect information from you electronically when you visit our website. For example, we collect information about your use of the website, which may include the following:

- The date and time of visits
- Which pages are viewed
- How users navigate through the site
- Location information about users
- Information about the browser and device used to visit our website, and
- IP addresses.



When you visit our website, our server places small pieces of data known as 'cookies' on your hard drive. Cookies are pieces of information that are transferred to your computer when you visit a website for record-keeping purposes. Most web browsers are set to accept cookies, however, if you do not wish to receive any cookies you may set your web browser to refuse cookies. Generally, we use cookies to provide us with information and track usage patterns on our website and we do not link this information to any information you may have provided us with.

From Linear's website it may be possible to access other Websites whose operator may or may not adhere to a privacy policy or be governed by the Australian Privacy Principles. You should keep this in mind and check the privacy policy of the other sites when you navigate away from our site.

Access to and correction of your personal information

You may at any time request access to your personal information and we will generally provide you with access to that information. We will, prior to providing access in accordance with this policy, require you to provide evidence of your identity.

If you can show us that the personal information is inaccurate, then we will take reasonable steps to correct it. Note that we need not provide access to personal information in several types of situations, for example, where a request is frivolous or where to provide access would pose a threat to health or public safety, it would unreasonably interfere with another person's privacy, it relates to existing or anticipated legal proceedings between the entity and the individual and would not be accessible by the process of discovery, or be a breach of the law.

If we refuse you access to your personal information, then we will provide you with an explanation for that refusal.

Complaints

Linear has in place processes to properly consider and deal with any enquiries or complaints if you believe the privacy of your personal information has been compromised. Linear will respond to all complaints in accordance with its Complaints Handling Policy which provides that all complaints are acknowledged immediately or if this is not possible then as soon as possible after receipt.

Linear will endeavour to contact and advise you when your complaint is likely to be resolved, however, Linear's policy is to provide a final response for privacy complaints relating to non-super related products within 45 days of the acknowledgement of the complaint and within 90 days for super product related matter.

It is our intention to use our best endeavours to resolve any complaint to your satisfaction, however, if you are unhappy with our response, you are entitled to contact the Financial Ombudsman Service (FOS) of which we are a member. FOS can be contacted at:

Financial Ombudsman Service
Address: GPO Box 3,
Melbourne VIC 3001
Telephone: 1300 780 808
Facsimile: (03) 9613 6399
Email: info@fos.org.au

If you are not satisfied with the outcome of FOS's investigation then you may contact the Office of the Australian Information Commissioner who may investigate your complaint further. The Australian Information Commissioner's contact details are:

Office of the Australian Information Commissioner
Address: GPO Box 5218,
Sydney NSW 2001
Telephone: 1300 363 992

Changes to our privacy policy

From time to time this privacy statement may change. If we amend our privacy statement then we will include an updated version on our website at www.linearassetmanagement.com.au.

Contact Details

If you would like more information on how we manage your personal information, or if you have any questions, or wish to make a complaint about a breach of privacy, please contact us using the details below:

Linear Privacy Officer Level 9, 525 Flinders Street
Melbourne VIC 3000
Phone: 1300 669 891
Fax: 03 9629 2550
Email



