



PRIVACY POLICY – last updated on 19 February 2024

Harland Green Pty Ltd ACN 667 663 970

1. PURPOSE OF THIS POLICY

This Privacy Policy applies to the collection, use, disclosure and handling of personal information by Harland Green Pty Ltd ACN 667 663 970 and its associated entities, including Harland Green Specialty Pty Ltd ACN 672 498 449, Harland Green Investments Pty Ltd ACN 672 498 289 and Harland Green Operations Pty Ltd ACN 672 498 378 (collectively **Harland Green, we, us or our**) including personal information collected via our website available at www.harlandgreen.com and any of its regional or other domains or properties, and includes any related service, tool or application, specifically including mobile web, any iOS application and any Android application, or other access mechanism (**Site**).

This Privacy Policy is designed to tell you what will happen to the information you provide through the Site or through any other form of communication with us, our associates, our wholly owned subsidiaries or contractors. Please be sure to read this entire Privacy Policy before using the Site or submitting personal information to us.

Harland Green is committed to protecting the privacy of individuals and is bound by the Australian Privacy Principles set out in the *Privacy Act 1988* (Cth) (**Act**). We will only collect, use or disclose personal information in accordance with the Act and this Privacy Policy.

2. PERSONAL INFORMATION

This Privacy Policy concerns any personal information or sensitive information of yours which is provided to us.

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

Sensitive information is any personal information about your racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health, genetics, biometrics or biometric templates.

We generally do not wish to be informed of a person's sensitive information. We, in any event, will collect, use or disclose sensitive information about you only as allowed by law, for example where we have received your consent to do so or the collection is required by law.

3. CONSENT

By using the Site or otherwise providing us directly, or through others, with your personal information, you agree with the terms of this Privacy Policy and consent to the collection, use, and disclosure of that information in accordance with this Privacy Policy, the Act as amended (including the Australian Privacy Principles) and other applicable privacy laws.

4. COLLECTION OF PERSONAL INFORMATION

We collect personal information that is necessary for our business activities and in order to provide and develop our services. We may do this in a number of ways, including:

- (a) directly from individuals, when you provide it to us or our agents or contractors (including verbally or through email communication);
- (b) when you complete any forms, applications or use any 'contact us' pages on our Sites;
- (c) from publicly available resources;
- (d) by analysing records of your use of our services and Sites; or
- (e) through other methods for collecting information.

4.1. Collection under the law

We may also collect your personal information when legally required to do so under law. Where we provide you with certain services, we may be required to collect additional personal and sensitive information under the *Income Tax Assessment Act 1936 (Cth)* and *Anti Money Laundering and Counter Terrorism Financing Act 2006 (Cth)*.

4.1 PASSIVE INFORMATION COLLECTION

As you navigate through our Site, certain information can be passively collected (that is, gathered without you actively providing the information) through various technologies, such as cookies, internet tags or web beacons and navigational data collection.

Our Sites may use and combine such passively collected anonymous information to provide better services to website visitors, customise the website based on your preferences, compile and analyse statistics and trends and otherwise administer and improve the website for your use. Such information is not combined with personally identifiable information collected elsewhere on the respective Site unless you have consented.

5. TYPE OF INFORMATION COLLECTED AND WHY

The type of personal information we collect may include (but is not limited to), your name, date of birth, address, postcode, telephone numbers, email address and information on usage and preferences regarding Harland Green's products and services.

We may also collect sensitive information about you, including health information and criminal background checks.

If we are not able to collect personal information about you we may not be able to provide you with products, services and assistance to the extent that they require us to collect, use or disclose personal information.

The personal information you provide us may be used for a number of purposes connected with its business operations, which include to:

- (a) verify identity;
- (b) facilitate the provision of products and services;
- (c) address or respond to any requests;
- (d) inform customers of existing and proposed products and services;
- (e) better understand customer needs;
- (f) develop and improve the quality and scope of the products and services NashCap provides; and
- (g) seek feedback.

5.1 USING INFORMATION FOR DIRECT MARKETING

Your personal information may be used so that we, our associates, our subsidiaries, agents and contractors can provide you with information about our products and services, such as by way of direct mail or telemarketing, and, where you have opted in, by email, SMS and MMS, or to request your feedback for promotional purposes. You always have the right to opt-out of receiving such information. You may exercise that right by contacting us as set out below.

5.2 OTHER PURPOSES OF COLLECTION

We may also use your personal information for purposes related to those described above which would reasonably be expected by you.

We will not use your information for purposes other than those described above unless we have your consent or as permitted by law (including for law enforcement or public health and safety reasons).

5.3 WHEN WILL YOUR INFORMATION BE SHARED

We may disclose your personal information in certain circumstances, such as where we are required or authorised by law or where you have consented to us doing so.

We also may disclose your personal information to:

- (a) others in accordance with a request made by an individual;
- (b) related companies and business partners; and
- (c) persons engaged in providing us with professional, business, technology and corporate services, when reasonably required.

When making such a disclosure we will take reasonable steps to ensure that the recipient is bound by privacy obligations.

Unless you consent, we otherwise will not disclose your personal information to third parties.

5.4 SHARING INFORMATION OUTSIDE AUSTRALIA

We will only send your personal information outside Australia:

- (a) if authorised to do so by law;
- (b) for any of the purposes set out in this Privacy Policy (but only to parties that are subject to obligations in relation to personal information no less onerous than those in this Privacy Policy); or
- (c) if consent is given to us doing so.

In the course of Harland Green's ordinary business operations Harland Green does not disclose personal information to offshore third parties, however Harland Green uses a cloud based software system to store your personal information, and as a result some of your information may be held overseas.

6. ACCESS AND CORRECTION OF INFORMATION

You may request access to any of the personal information we hold about you by contacting us as specified below.

We will take all reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and up to date. To ensure your personal information is accurate, please notify us of any errors or changes to your personal information and we will take appropriate steps to update or correct such information in our possession.

7. Storage and Security of Information

We will take all reasonable precautions to safeguard information from loss, misuse, unauthorised access, modification, disclosure or destruction. We may store your files electronically. We implement a range of physical and electronic security measures to protect the personal information that is held, including use of passwords, firewalls and other electronic security measures as well as physical security devices.

You should keep in mind that no internet transmission is ever completely secure or error-free. In particular, e-mails sent to or from our Site may not be secure.

8. NOTIFIABLE DATA BREACH SCHEME

In the event of any loss or unauthorised access or disclosure of your personal information that is likely to result in serious harm to you, we will:

- (a) investigate; and
- (b) notify you and the Australian Information Commissioner as soon as practicable, in accordance with the Act.

9. COMPLAINTS

If you have any questions or concerns about our collection, use or disclosure of personal information, or if you believe we have not complied with this Privacy Policy or the Act, please contact us as set out below. A representative from Harland Green will investigate the complaint and determine whether a breach has occurred and what action, if any, to take.

Harland Green will take any privacy complaint seriously and will aim to resolve any such complaint in a timely and efficient manner (Harland Green has a target response time of 30 days).

Harland Green expects our procedures will deal fairly and promptly with any complaints. However, if any person remains dissatisfied, they can also make a formal complaint with the Officer of the Australian Information Commissioner (which is the regulator responsible for privacy in Australia):

Office of the Australian Information Commissioner (OAIC)

Complaints must be made in writing

Director of Compliance
Office of the Australian
Information Commissioner
GPO Box 5218
Sydney NSW 2001
[1300 363 992](tel:1300363992)
www.oaic.gov.au

10. LINKS TO OTHER WEBSITES

Our Site may contain links or references to other websites to which this Privacy Policy may not apply. You should check their own privacy policies before providing your personal information.

11. CHANGES TO THIS POLICY

The date of this Privacy Policy is set out at the beginning of this policy. We may change this Privacy Policy at our discretion. By continuing to use any Site, or otherwise continuing to deal with us, you accept this Privacy Policy as it applies from time to time.

12. CONTACT US

If anyone wishes to exercise a right to opt-out of receiving our marketing materials, or if any person has any questions or concerns about this Privacy Policy, privacy issues or queries or our information practices, please contact us at: enquiries@harlandgreen.com