

PRIVACY POLICY

Purpose

This privacy policy applies to R J Sanderson & Associates Pty Ltd, ABN 71 060 299 783 and any entity owned or controlled by R J Sanderson & Associates Pty Ltd ("Related Entity") in relation to R J Sanderson Group' and its Related Entities' including RJS Loan Solutions Pty Ltd, ABN 25 123 033 116 and RJS Wealth Management Pty Ltd ABN 24 156 207 126 (together referred to "R J Sanderson Group") operations in Australia. This policy explains how R J Sanderson Group handles personal information and complies with the requirements of the Australian Privacy Act 1988 (Cth) ("Privacy Act"). If you have any further questions in relation to this policy, please contact our Operations Manager or Privacy Manager at our head office.

Exclusions

This policy relates to R J Sanderson Group' collection and handling of personal information that is covered by the Privacy Act. It is not intended to cover categories of personal information that are not covered by the Privacy Act.

Policy

Collection of Personal Information

R J Sanderson Group collects and holds personal information from clients, customers, employees, contractors and other individuals. We collect and hold this information when it is necessary for business purposes.

The main types of personal information R J Sanderson Group collects and holds relate to the contact details and organisational roles of our clients, suppliers and other business contacts. Typically, this information includes names, addresses, telephone numbers, e-mail addresses, job titles and tax file numbers. In the course of providing professional services to our clients, we may collect and hold more detailed personal information (for instance financial details if we are engaged to perform financial services, or credit information).

We collect most information directly from individuals when we deal with them. The personal information we collect may be provided in forms filled out by individuals, face to

face meetings, email messages, telephone conversations or by third parties. If you contact us, we may keep a record of that contact.

Because of the nature of our business, it is generally impracticable for us to deal with individuals on an anonymous basis or through the use of a pseudonym, although sometimes this is possible (for example, when seeking staff or client feedback generally).

Use of Personal Information

The main purposes for which we collect, hold and use personal information are:

- to provide our services;
- to respond to an individual's request;
- to maintain contact with clients;
- to keep clients and other contacts informed of the services we offer and industry developments that may be of interest to them, and to notify them of service offerings, seminars and other events we are holding;
- for general management and reporting purposes, such as invoicing and account management;
- for recruitment purposes;
- for purposes related to the employment of our personnel and providing internal services to our staff;
- Other purposes related to our business.

If you choose not to provide us with personal information, we may be unable to do such things.

We may collect, hold and use personal information about individuals to market our services, including by email. However, individuals always have the opportunity to elect not to receive further marketing information from us by writing to The National Privacy Office, R J Sanderson Group, GPO Box 1331, Melbourne VIC 3001, or by emailing us at privacy.officer@au.pwc.com. Please allow 28 days for your request to be processed.

Alternatively, if we have contacted you by email, you may use the unsubscribe function in that email to notify us that you do not want to receive further marketing information from us by email.

If we collect, hold or use personal information in ways other than as stated in this policy, we will ensure we do so pursuant to the requirements of the Privacy Act.

Employee records are not generally subject to the Privacy Act and therefore this policy may not apply to the handling of information about employees by R J Sanderson Group. For information about our practices relating to employee information, please contact us directly.

Disclosure of Personal Information

R J Sanderson Group does not routinely disclose personal information to other organisations unless:

- use or disclosure is permitted by this policy;
- we believe it is necessary to provide you with a product or service which you have requested (or, in the case of a partner, employee or contractor of R J Sanderson Group, it is necessary for maintaining or related to your role at R J Sanderson Group);
- to protect the rights, property or personal safety of any member of the public or a customer of R J Sanderson Group or the interests of R J Sanderson Group;
- some or all of the assets or operations of R J Sanderson Group are or may be transferred to another party as part of the sale of some or all of R J Sanderson Group' business;
- you give your consent; or
- Such disclosure is otherwise required or permitted by law, regulation, rule or professional standard.

We may also share non-personal, de-identified and aggregated information for research or promotional purposes. Except as set out in this policy, we do not sell to or trade personal information with third parties.

R J Sanderson Group uses a range of service providers to help us maximise the quality and efficiency of our services and our business operations (including internal business requirements, such as recruitment and human capital requirements). This means that individuals and organisations outside of R J Sanderson Group will sometimes have access to personal information held by R J Sanderson Group and may collect or use it from or on behalf of R J Sanderson Group. This may include, but is not limited to, independent

contractors and consultants, travel service providers, mail houses, off-site security storage providers, information technology providers, event managers, credit managers and debt collecting agencies. We require our service providers to adhere to our privacy guidelines and not to keep, use or disclose personal information we provide to them for any unauthorised purposes.

If R J Sanderson Group' staff obtain products or services offered by a third party pursuant to an agreement or arrangement between that third party and R J Sanderson Group, such as a credit card provider, we may provide your personal information to that third party, including information that relates to your use of such services.

Transfer of information outside Australia

As part of a global network of R J Sanderson Group firms, R J Sanderson Group exchanges information, including personal information, between network firms. As a result, we may transfer personal information outside Australia to countries whose privacy laws do not provide the same level of protection as Australia's. R J Sanderson Group and other R J Sanderson Group firms with which we exchange information may also use overseas facilities or contractors to process or back-up our information or to provide certain services to us. As a result, we or another R J Sanderson Group firm may transfer your personal information to our overseas facilities or contractors for these purposes.

However, any such transfer of information does not change any of our commitments to safeguard your privacy and the information remains subject to existing confidentiality obligations.

Privacy on Our Web Sites & Applications

This policy also applies to any personal information we collect via our websites, including but not limited to, rjsanderson.com.au, and applications including mobile applications. In addition to personal information you provide to us directly (such as where you make a request or complete a registration form), R J Sanderson Group may also collect personal information from you via its applications and websites.

Cookies are small text files that are placed on your computer by the websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. The use of cookies is now standard for most websites. If you are uncomfortable with the use of cookies, you can manage and

control them through your browser, including removing cookies by deleting them from your 'browser history' (cache) when you leave the site. In most cases, you can refuse a cookie and still fully navigate the R J Sanderson Group websites.

In order to properly manage our websites and applications, we may log certain statistics about the users of the facilities, for example the users' domains and browser types. None of this information specifically identifies an individual and it is used solely to ensure that our websites and applications present the best possible navigational experience for users.

If you have registered an account with us, you will may be identified by a user name and password when you log into our website or applications. The information we collect about members' use of our websites may be used for measuring use and performance and in assisting to resolve any technical difficulties.

Because R J Sanderson Group wants your user experience to be as informative and resourceful as possible, we provide a number of links to websites and embedded content operated by third parties that may also set cookies. R J Sanderson Group is not responsible for the privacy practices or policies of those sites. We encourage you to review each website's privacy policy, especially if you intend to disclose any personal information via that site. A link to another non R J Sanderson Group website is not an express or implied endorsement, promotion or warranty of the products or services offered by or accessible through that site or advertised on that site.

Security of Personal Information

Depending on the purpose for which we have collected personal information (for example, registration for an R J Sanderson Group event or a request for particular information or material), we may store some of the information electronically in R J Sanderson Group' customer relationship management system. Some or all of this personal information may be available to partners and authorised staff of R J Sanderson Group for use in accordance with this policy.

R J Sanderson Group will endeavour to take all reasonable steps to keep secure any information which we hold about you, whether electronically or in hard-copy, and to keep this information accurate and up to date. We also require our employees and data processors to respect the confidentiality of any personal information held by R J Sanderson Group.

R J Sanderson Group aims to achieve industry best practice in the security of personal information which it holds. It is our policy not to generally retain personal information once there is no longer a legal or business need for us to do so

Access to Information

We provide access to personal information upon request by an individual, except in the limited circumstances in which it is permitted for us to withhold this information (for instance, where granting access would infringe another person's privacy).

When you make a request to access personal information, we will require you to provide some form of identification (such as a driver's licence or passport) so we can verify that you are the person to whom the information relates. In some cases we may also request an administrative fee to cover the cost of access.

If at any time you want to know what personal information we hold about you, you may contact us by writing to: 60 Robinson Street Dandenong Vic 3175, or emailing us at info@rjsanderson.com.au

Corrections & Concerns

If you believe that information we hold about you is incorrect or out of date, or if you have concerns about how we are handling your personal information, please contact us and we will try to resolve those concerns.

If you wish to have your personal information deleted, please let us know and we will take reasonable steps to delete it (unless we need to keep it for legal, auditing or internal risk management reasons).

If R J Sanderson Group becomes aware of any ongoing concerns or problems concerning our privacy practices, we will take these issues seriously and work to address these concerns. If you have any further queries relating to our privacy policy, or you have a problem or complaint, please contact our Privacy Officer. If you are not satisfied with our handling of your problem or complaint you may make a complaint to the Australian Information Commissioner.

Effect of Policy

R J Sanderson Group operates in a dynamic business environment and we aim to review this policy annually to keep it current.

R J Sanderson Group may update this privacy policy at any time by publishing an updated version on this website.

The amended policy will apply between us whether or not we have given you specific notice of any change.

This policy was last updated March 2016