

Frontier Advisors Privacy Policy

August 2013

1 Respecting Your Privacy

Frontier Advisors Pty Ltd (ACN 074 287 406) of Level 16, 222 Exhibition Street, Melbourne, Victoria, Australia 3000, and our subsidiaries and related bodies corporate (“we”, “our” and “us”) are committed to supporting the National Privacy Principles for the Fair Handling of Personal Information (“NPPs”) contained in the *Privacy Act 1988 (Cth)* (“Privacy Act”).

Our respect for your right to privacy of your personal information is paramount. We ensure that all personal information, no matter how or where it is obtained, is handled in accordance with the NPPs.

This Privacy Policy sets out:

- matters of which you should be aware regarding information we may collect about you;
- our policies on the management of your personal information; and
- generally, what sort of information we hold, why we hold the information we hold, and how we collect, hold, use and disclose that information.

2 Terminology

In our Privacy Policy, “personal information” refers to information or an opinion about a person whose identity is apparent or can reasonably be ascertained from the information or opinion.

3 How Do We Collect and Store Your Personal Information?

In accordance with the NPPs, we only collect personal information about an individual if the information is necessary for one or more of our functions or activities and we must only collect personal information by lawful and fair means. Further, we must not collect personal information in an unreasonably intrusive manner. If it is reasonable and practicable to do so, we will collect personal information about an individual only from that individual. However, we comply with the NPPs by taking reasonable steps to make an individual aware of the matters outlined in our privacy policy, even where we collect the personal information about an individual from someone else.

We may collect your personal information directly from you, or alternatively where permitted under the NPPs, from third parties. Sources may include, but are not limited to:

- your employer in the case of being authorised to use our on-line portal;
- a telephone or in-person inquiry about our services;
- emails or other electronic means (including by using our website);
- third parties, such as credit reporting agencies or your representatives;
- publicly available sources of information; and
- our service providers.

We may also collect “de-identified information” through your use of our website, including the dates and times you access our website, the domains from which you visit our website, your activity on our website and Internet Protocol addresses. This information is referred to as “click stream data” and we may use this data to analyse trends and statistics in order to improve our website and our services. We collect this data using various technologies, including “cookies”. A “cookie” is a text file that our website sends to your browser which is then stored on your computer as an anonymous tag identifying your computer (but not you) to us. You can set your browser to disable cookies. However, some parts of our website may not function properly or at all if cookies are disabled.

Some pages on our website and emails created by our website may also contain a “web beacon”. A web beacon is a clear-pixel image which enables us to monitor your Internet activity on our website or on-line portal. When you view a page containing a web beacon, a de-identified notice of your visit is generated which we may process. A web beacon generally works in conjunction with a cookie. If a person disables cookies, a web beacon will be able to generate an anonymous notice of the visit but which cannot be associated with the information contained in a cookie.

We store your personal information on a server based in Australia using all reasonable security measures to prevent unauthorised access to or disclosure of your personal information. We also take all reasonable measures to destroy or permanently de-identify personal information when it is no longer required. The nature of the measures we take depend on the type of information, how the information is collected and how we store the information.

4 Why Do We Collect Your Personal Information?

We may collect personal information including your name, address, telephone number, facsimile number and email address, for one or more of the following purposes:

- to provide our services to you or to other persons or organisations that are related to you;
- to provide you or any other person or organisation related to you with access to our online portal;
- to market, advertise or otherwise promote our services;
- to undertake market research in relation to our services;
- to improve our website, our online portal and our online services; and
- to comply with our obligations under any applicable laws.

We may need your personal information to notify you of our future improvements to our services or to seek your participation (purely on a voluntary basis) in advertising campaigns, launches, customer testimonials and focus groups.

Generally, you have no obligation to provide any information we request (save under any contract between you or your related party and us where you may be obliged to provide information). If you choose to withhold requested information, however, we may be unable to provide you or other persons or organisations that are related to you or which you represent with the services that depend on our collection of your personal information (particularly if the collection of that information is required by law).

5 How Do We Use Your Personal Information?

We generally use your personal information to provide goods or services to you or to other persons or organisations related to you or which you represent. For example, we need your contact details to provide you with access to our investment advisory services (including via our on-line portal).

We may disclose your personal information to third parties (including credit reporting agencies, banks and our professional advisers) for the purpose of completing our obligation owed to you under any contract between us and you, as required by law.

You have the right to tell us that you do not want us to send information to you other than for the main purpose for which we collect your personal information. Where possible, we try to ensure that our disclosure of your personal information to other organisations is in a way which does not personally identify individuals.

6 How Do We Protect Your Personal Information?

We take reasonable steps to protect your personal information which we hold from misuse and loss and from unauthorised access, modification or disclosure.

When using our website or our online portal, you should be aware that no data transmission over the Internet can be guaranteed to be totally secure. We do not warrant the security of any information transmitted over the Internet, although we strive to protect such information. By using our website and our portal, you accept that your information will be transmitted to and from our website and portal at your own risk.

7 Destruction of Your Personal Information

Where permitted by law, if we no longer need your personal information for any purpose outlined above, we will take reasonable steps to destroy or permanently de-identify your personal information.

8 Access to and Correction of Your Personal Information

In accordance with the NPPs, we will provide you with access to any of your personal information we hold (except in the limited circumstances recognised by the NPPs). If you wish to access personal information we hold about you, please write to us at Frontier Advisors Pty Ltd, Level 16, 222 Exhibition Street, Melbourne, Victoria, Australia 3000. You may also email us at mail@frontieradvisors.com.au.

Of course, before we provide you with access to your personal information we will require you to verify your identity to us.

For most requests, access to your personal information will be provided free of charge. However, we may charge a reasonable fee if your request requires a substantial effort on our part.

If you need to update your information (i.e. if you change your address), please contact us so that we can make the change.

9 Updates to our Privacy Policy

We may amend or replace our Privacy Policy from time to time. Any changes to this Privacy Policy will be published on our website.

You may obtain a copy of our current Privacy Policy from our website or by contacting us using the contact details set out above.