



PRIVACY POLICY

1 General

This Privacy Policy is designed to tell you what will happen to the personal information you provide to us, White & Partners Group Pty Ltd ACN 611 109 016 and our related bodies corporate including Ray White Capital Pty Ltd ACN 611 275 711 and Calow Nominees Pty Ltd ACN 164 996 203. (together 'us', 'we' or 'our').

By using our website 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 *Privacy Act 1988 (Privacy Act)* as amended (including the Australian Privacy Principles) and other applicable privacy laws. We may change our Privacy Policy from time to time by publishing changes to it on our website. We encourage you to check our website periodically to ensure that you are aware of our current Privacy Policy.

2 What kinds of personal information is collected and held?

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

Personal information is any information or opinion 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.

We generally do not collect 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. 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.

The kinds of personal information we collect may include:

- **If you are our client:**
 - your name;
 - address (work, mailing or home);
 - email address
 - telephone number (work or personal) and other contact details;
 - age or date of birth;
 - bank account and credit card information;
 - your device ID, device type, geo-location information, computer and connection information statistic on page view, traffic to and from the sides, ad data, IP address and standard web log information;
 - details of any products and services we have provided to you or that you have enquired about, including any additional information necessary to deliver those products and services and respond to your enquiries;
 - any additional information relating to you that you provide to us directly

through our website or app or indirectly through your use of our website or app or online presence or through other websites or accounts from which you permit us to collect information; and

- any other personal information that may be required in order to facilitate your dealings with us.

- **If you apply for a job or position with us:**

- your name;
- contact details;
- date of birth;
- citizenship;
- employment references;
- relevant record checks; and
- employment history.

Once appointed, we will also collect and hold TFNs, financial information relating to the appointment and banking details for payments.

If we are not provided with the personal information that we request, we may not be able to meet your request or provide our products or services.

3 *How is personal information collected?*

We collect personal information in a number of ways, including when you

- register on our website or app;
- communicate with us through correspondence, chats, emails or when you share information with us from other social applications, services or websites;
- interact with our sites, services, content and advertising; or
- invest in our business products and business or enquire as to a potential investment or purchase in our business; or
- apply for a job or position with us as well as from any recruitment consultant, your previous employers and others who may be able to provide information to us to assist in our decision on whether or not to make you an offer of employment or engage you under a contract.

We also collect personal information:

- from publicly available resources; or
- by analysing our own records of your use of our products or services and website, including from:
 - our investor website (including 'Dynamo' and 'Investment Cafe' investor login spaces),
 - online investor applications via www.olivia123.com;
 - the Apex Invest platform (<https://www.apexgroup.com/apex-invest/>); or
 - paper form investor applications.

Passive information collection

As you navigate through our website, 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.

This website 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 website unless you have consented.

4 Why we collect, hold, use and disclose personal information?

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

- verify your identity;
- consider any application to invest;
- enable you to access and use our website and products and services;
- operate, protect, improve and optimise our website, products and services, business and our users' experience, such as to perform analytics, conduct research and for advertising and marketing;
- provide you with financial products or services;
- report to you and send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you;
- send you marketing and promotional messages and other information that may be of interest to you, including information sent by, or on behalf of, our business partners that we think you may find interesting;
- administer rewards, surveys, contests, or other promotional activities or events sponsored or managed by us or our business partners;
- to comply with our legal obligations, resolve any disputes that we may have with any of our users and enforce our agreements with third parties;
- inform you of existing and proposed products and services which we provide;
- better understand your needs in the area of financial products or services;
- develop and improve the quality and scope of the products and services we provide, and seek your feedback;
- address or respond to any requests from you;
- to consider your employment application;
- comply with our regulatory or legal requirements, including:
 - the *Anti-Money Laundering & Counter-Terrorism Act 2006*;
 - the *Corporations Act 2001*;
 - the *Australian Securities and Investments Commission Act 2001*
 - the *Bankruptcy Act 1966*;
 - the *Tax Laws Amendment (Implementation of the FATCA Agreement) Act 2014*;

- the *Tax Laws Amendment (Implementation of the Common Reporting Standard) Act 2016*; and
- applicable taxation law.

Your personal information may be used so that we and/or our carefully selected business partners can provide you with information about our/their products and services, such as by way of direct mail or telemarketing, and, where you have opted in, by email, SMS and MMS or other forms of communication, 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 our Privacy Officer as set out below in section 8 or by using the opt-out facilities provided (eg an unsubscribe link). 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 *How is your personal information held?*

We respect the personal information you have entrusted to us and we have a responsibility to manage and protect that information. We will take all reasonable precautions to safeguard your information from loss, interference, misuse, unauthorised access, modification, disclosure or destruction. We will store your files in a secure environment in hard copy, electronically or both.

We implement a range of physical and electronic security measures to protect the personal information that we hold, such as multi-factor authentication, email scanning and filtering, comprehensive network scanning and are certified to ISO 27001:2022. However, we cannot guarantee the security of your personal information.

With the exceptions detailed within this Privacy Policy, your personal information will only be available to our employees or those of our service providers on a need-to-know basis in order to perform their obligations and duties.

6 *Third party links*

Our website may contain links to websites operated by third parties. Those links are provided for convenience and may not remain current or be maintained. Unless expressly stated otherwise, we are not responsible for the privacy practices of, or any content on, those linked websites, and have no control over or rights in those linked websites. The privacy policies that apply to those other websites may differ substantially from our Privacy Policy, so we encourage individuals to read them before using those websites.

7 *To whom might your personal information be disclosed?*

Generally, we will only disclose your personal information for the purposes of providing our financial products or services to you. This may include disclosing your personal

information to:

- our employees and related bodies corporate;
- third party suppliers and service providers (including providers for the operation of our websites and/or our business or in connection with providing our products and services to you);
- professional advisers, dealers and agents;
- payment systems operators (eg merchants receiving card payments);
- our existing or potential agents, business partners or partners;
- our sponsors or promoters of any competition that we conduct via our services;
- anyone to whom our assets or businesses (or any part of them) are transferred;
- specific third parties authorised by you to receive information held by us; and/or
- other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

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.

8 Does my personal information leave Australia?

We may disclose personal information to overseas recipients outside Australia to third party suppliers and cloud providers. When you provide your personal information to us, you consent to the disclosure of your information outside of Australia and acknowledge that we are not required to ensure that overseas recipients handle that personal information in compliance with Australian Privacy Principles. We will, however, take reasonable steps to ensure that any overseas recipient will deal with such personal information in a way that is consistent with the Australian Privacy Principles.

Personal information that is collected will be stored on our AWS and Google Cloud Infrastructure, that is hosted outside of Australia and is protected and secured appropriately to protect your personal information from misuse, interference, and loss, as well as unauthorised access, modification or disclosure.

In the course of our ordinary business operations, we commonly disclose personal information to third parties located in various countries.

Should you wish to know what personal information holds on you, or should you wish to amend it, you may request to view this information by contacting our Privacy Officer:

Name: General Counsel

Address: Level 25, 111 Eagle Street Brisbane, Queensland Australia

Tel no.: +61 404 895 027

Email: mjohnston@raywhite.com

We will promptly investigate your privacy enquiry and provide you with appropriate answers where required. Sometimes, we may not be able to provide you with access to all of your personal information and, where this is the case, we will tell you why. Should you discover that any information is outdated, incorrect or incomplete you may request to have the personal information corrected and we will promptly update our records. 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.

9 Notifiable Data Breaches 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 that we have been unable to prevent with remedial action, we will:

- investigate; and
- notify you and the Office of the Australian Information Commissioner as soon as practicable,

in accordance with the Privacy Act.

10 How can I complain about a breach of my privacy?

If you wish to make a complaint about our handling of your personal information, you should contact the Privacy Officer as referred to above in section 8. Please include your name, email address and/or telephone number and clearly describe your complaint. Alternatively, complaints about potential privacy breaches or concerns, can be directed to our dedicated email address abuse@raywhite.com.

We will take any privacy complaint seriously and will aim to resolve any such complaint in a timely and efficient manner, and our target response time is 30 days.

We expect that our procedures will deal fairly and promptly with your complaint. However, if we cannot resolve your complaint then you may raise your issue with the Office of the Australian Information Commissioner (which is the regulator responsible for privacy in Australia).

11 Additional information and changes to this Privacy Policy

If you have any questions or concerns about this Privacy Policy or our information practices, please contact our Privacy Officer as referred to above in section 8.

Our Privacy Policy may change from time to time. Before providing us with personal information, please check the Privacy Policy on our website for any changes.

Further information on privacy in Australia may be obtained by visiting the website of the Office of the Australian Information Commissioner at: <http://www.oaic.gov.au/>.

This Privacy Policy was last updated in May 2025.