

# **V J RYAN SECURITIES LIMITED**

## **PRIVACY POLICY**

**31 OCTOBER 2016**

Version 11	31 October 2016
Version 10	30 October 2015
Version 9	31 October 2014
Version 8	1 May 2014
Version 7	31 October 2013
Version 6	31 October 2012
Version 5	31 October 2011
Version 4	31 October 2010
Version 3	31 October 2009
Version 2	31 October 2008
Version 1	31 October 2007
Created	31 October 2006

## **PRIVACY POLICY**

VJ Ryan Co Securities Limited (**we, us, our**) is committed to maintaining the privacy and confidentiality of personal information. We are subject to the Commonwealth Privacy Act 1988 (**Act**) and accordingly we will adhere to the Australian Privacy Principles (**APPs**) when collecting, using, disclosing, securing and providing access to personal information.

### ***The information we collect***

Whenever it is reasonable and practicable to do so, we only collect information about you directly from you or otherwise in accordance with this policy.

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

We generally collect and hold personal information relating to:

- the products and services we provide or have provided to you;
- your financial interests and sometimes your financial position;
- your details as a means of identification and to contact you including (but not limited to) your full name, email address, telephone number, address and date of birth;
- Tax File Number (TFN); and
- complaint details.

We may also collect personal information from third parties including our related entities.

We are authorised to collect TFNs by the *Income Tax Assessment Act 1936 (Cth)*. It is not compulsory for you to provide your TFN for our products and services, but if you do not, taxation law may require additional deductions to be made from amounts payable to you.

We do not generally collect sensitive information about you unless required by applicable laws or rules. Sensitive information includes information relating to:

- race;
- political or religious beliefs;
- sexual preferences;
- criminal convictions;
- membership of professional or trade associations or unions; and
- health information.

### ***How that information is used***

We only collect, hold and use personal information about you which is reasonably necessary to:

- open your account in the VJ Ryan Cash Management Trust;
- communicate with you and provide you quality products or services;
- consider applications and approaches you make to us;
- maintain your contact details; and
- meet our obligations under Government legislation.

We may also use your personal information for other directly related purposes.

You consent to us using your personal information in the above ways. We may collect, hold and use your personal information for other purposes not listed above. If we do so, we will make it known to you at the time we collect such information.

We will not use personal information provided by you to us in a manner inconsistent with the Act, the APPs or any other relevant laws or guidelines.

### ***Disclosing your personal information***

We do not sell personal information to other organisations.

We may disclose personal information to our service providers who provide services in connection with our products and services or we may provide information about you to our associated entities.

Generally, we will only disclose your personal information to these parties:

- for the purposes set out in this privacy policy or any agreement you enter into with us;
- in circumstances permitted by the APPs;
- if we are otherwise required or authorised by law, including without limitation the APPs under the Act; or
- if the disclosure is made with your consent.

### ***Protecting and maintaining the quality of personal information***

Protecting personal information is a priority to us. We take into account security and confidentiality when handling personal information in both the physical and electronic environment. We protect your information by using technical and physical security measures to reduce the risks of loss, misuse, unauthorised access, disclosure and alteration. Some of the safeguards we use are firewalls, virus scanning tools, data encryption and secure work environments.

If other organisations provide support services, we require them to appropriately safeguard the privacy of the information provided to them.

Where the personal information we collect is no longer required, we securely delete the information.

It is also important to us that the information we maintain and use is accurate, complete and up-to-date. If at any time personal details change, please let us know so we can update our records.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request amendment of it in writing. We will consider if the personal information requires amendment. In certain circumstances, we may also need to consult another party in order to respond to you.

If we are required to correct any of your personal information, we will take reasonable steps to correct the personal information within 30 days from the day on which the request is made or such longer period as you have agreed in writing. If we do not agree that there are grounds for amendment, we will provide you with our reasons why. If you are not satisfied with the outcome of your request, you can refer your request to the Australian Information Commissioner.

### ***How you can access your information***

You can contact us to request access to your information. In normal circumstances we will give you full access to your information. However, there may be some legal or administrative reasons to deny access. If access is denied, we will provide you with the reason why.

### ***Contact us***

If you would like to access the personal information that we hold about you, have a complaint or have any questions regarding our privacy policy or handling of information, please contact us:

**By phone**            9240 4900 or toll free 1800 092 762  
**By facsimile**       9247 5930  
**By email**            [vjryancmt@vjr.com.au](mailto:vjryancmt@vjr.com.au)

A copy of our privacy policy can be found on our website at [www.vjryancmt.com.au](http://www.vjryancmt.com.au).

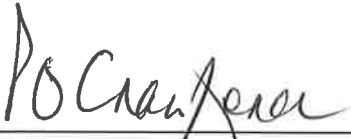
### ***Changes to this privacy policy***

We are entitled to amend or modify this privacy policy at any time. Nothing contained in this policy is intended to create contractual rights or obligations.

## REVIEW

This privacy policy will be reviewed prior to 31 October 2017.

Dated: 31.10.2016



---

P G Crawford – Director  
V J Ryan Securities Limited



---

J P Ryan – Director  
V J Ryan Securities Limited