

Privacy Policy

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1.0 – Introduction

1.1 - At Horizon Investment Solutions Pty Ltd, we are committed to protecting your privacy in accordance with the *Privacy Act 1988* (Cth). This Policy describes our policies and practices for collecting, handling, storing, using and disclosing personal information. It also deals with how you can complain about a breach of the privacy laws, access the personal information we hold about you and have that information corrected (where necessary).

1.2 – in this document:

- Horizon Investment Solutions Pty Ltd will be referred to as “Horizon” or “we” or “us” or “our”;
- “Personal Information” means information or an opinion about you where it is possible to ascertain your identity from that information or opinion.

2.0 - Collecting organisation and contact details.

2.1 – The personal information provided by you may have been collected by Horizons and/or its related entities. Any additional personal information provided by you in the future will also be collected by Horizons and/or its related entities.

2.2 – Horizons can be contacted at:

Attention: Compliance Manager
Unit 4
2-4 Jetty Road
BUNBURY WA 6230

OR

PO BOX 399
BUNBURY WA 6231
Telephone: (08) 9791 9188
Facsimile: (08) 9791 9187

Email: administration@horizonis.com.au

2.3 – We may also obtain personal and other information from third parties such as accountants and other organisations who also assist with your financial affairs. When we obtain personal and other information from third parties whom we are referred to by you, we will assume and you will ensure that you have made that third party aware of your referral and the purposes involved in the collection, use and disclosure of the relevant, personal or other information.

3.0 – What personal information Horizons collects or has collected

3.1 – We only collect personal information that is necessary for us to perform our functions. The personal information Horizons has collected from you as a client is necessary for one or more of our services or activities provided to you. The personal information Horizons has collected or may collect in the future may include any or all of the following personal information (This is not an exhaustive list):

- Your name
- Address
- Date of birth

- Your email address
- Your tax file number
- Details of your annual income, expenditure and employment
- Details of your assets and liabilities
- Details of any securities or investments you have given us
- Details of your associated bank accounts
- Details of specific transactions
- Details of your investment objectives and risk profile
- Details of health information relating to your insurance requirements
- Any other information we require to satisfy our obligations under relevant legislation

3.2 – We may also collect personal information directly from you when you deal with us over the telephone.

4.0 – Access to information

4.1 – You are entitled at any time to request access to personal information held by us about you and to ask us to correct this information where you believe (and in some circumstances prove) it is incorrect or out of date. To do this please contact us using the contract details above and you will be advised of our procedures for accessing and correcting personal information.

4.2 – Horizons will not charge you for lodging a request to access your personal information, but may charge you for Horizon's reasonable costs of making the personal information available to you. In limited circumstances access may be denied where required or permitted by law. If we decide not to provide you with access to your personal information, we will give you our reasons for our decision.

5.0 – Purpose and use of personal information

5.1 – Horizon has collected and may use your information to do one or the following:

- Open an account for you
- Maintain your account
- Process transactions on your behalf
- Enable us to assess any request from you for financial advice
- Send research information to you may contact us about
- Help us to assess products that may suit your financial needs
- Notify you of any products that may be interest to you
- Keep you informed on matters that may affect or be related to your investments
- Update your personal files
- Enable us to meet our obligations under certain laws
- To assist you in determining your investment objectives and providing you with investment advice and information on new opportunities to assist you in achieving these objectives
- To provide you with regular reviews and keep you informed on the performance of your investments
- Any purpose for which the information was requested and any directly related purpose
- Developing, improving and marketing our products and services

6.0 – Disclosing your personal information in Australia

6.1 – Horizons undertakes not to trade, rent or sell your personal information. Horizons may disclose your personal information to the following organisations for the purpose specified:

- a. To Integrated Portfolio Solutions Pty Ltd, whom Horizons engage for portfolio and SMSF Administration services
- b. To the Australian Stock Exchange, Chi-X Australian Pty Limited (Chi-X, Options clearing House, Fund Managers, Insurers, Share Registries and other product providers to establish accounts on your behalf or to process transactions
- c. To our bank, when depositing funds to your account
- d. To outsourcing organisations contracted by Horizons to provide administrative functions on our behalf, for example IT contractors providing maintenance of our data systems

7.0 – Disclosing your personal information overseas

7.1 – Some of our third party contractors and service providers may be based overseas or perform certain services overseas, or your portfolio may include interests managed by our overseas custodians and agents. As a result, your personal information may be disclosed (on a confidential basis) to a recipient in a foreign country.

7.2 – Horizon may disclose your personal information to an organisation in a foreign country if:

- You consent to the disclosure
- If the disclosure is required by law

- The transfer is necessary for the performance of a contract between you and the foreign organisation, or for the implementation of pre-contractual measures taken in response to your request
- Or the transfer is necessary for the conclusion or performance of a contract, concluded in your interest, between the foreign organisation and a third party

And

- Horizons reasonably believes that the recipient of the information is subject to a law, binding scheme or contract which effectively upholds principles for fair handling of the information that are substantially similar to the Australian Privacy Principles

Or

- Horizons has taken reasonable steps to ensure that the information which it has transferred will not be held, used or disclosed by the recipient of the information inconsistently with Australian Privacy Principles.

7.3 – In addition Horizons may disclose personal information it holds about you in the following circumstances:

- You consent to the disclosure
- If the disclosure is required by law

7.4 – If you have a trading account with Pershing Securities Australian Pty Ltd then this entity has related bodies corporate and unaffiliated service providers in locations beyond Australia. A copy of their privacy policy is available on request.

8.0 – Legal requirements to collect personal information.

8.1 – Prior to providing products or services to you Horizons is obligated by law to collect, and verify certain personal information from you. The laws governing these requirements include:

- The Financial Transactions Reports Act (1998) (Cth)
- The Anti-Money Laundering and Counter Terrorism Financing Act (2006) (Cth)
- Australian taxation laws
- The Corporations law
- Financial services laws

9.0 – Consequence of not providing personal information

9.1 – You may choose to not give Horizons your personal information. Depending on the type of product or service you request, one or all of the consequences set out below may apply if you do not give some or all of your personal information to us:

- Horizons will not be able to provide you with the requested account or facility
- Horizons will not be able to provide you with the requested investment product
- If you do not provide your tax file number, tax at the highest rate may be deducted from any dividends or interest paid to you on investments managed by Horizons
- Horizons will not be able to deposit funds to your bank account

10.0 – Where we collect the information from

10.1 – In most instances personal information about you will be collected directly from you in either an application form or documents completed by you, correspondence from you to us, during an interview or telephone contact.

10.2 – We may also obtain personal and other information from some third parties such as accountants and other organisation who have referred you to us or we have referred you to them. When we obtain personal and other information from third parties whom we are referred to by you, we will assume and you will ensure that you have made that third party aware of your referral and the purposes involved in the collection, use and disclosure of the relevant personal or other information.

10.3 – Personal information about you may also be collected from our website but only if you voluntarily provide us with your details (e.g. If your email your contact details to us or if you use a logon and password to access a particular service).

10.4- The Horizons website contains links to the websites of third parties. If you access those third party websites they may collect information about you. Horizons does not collect information about you from the third parties. You will need to contact them to ascertain their privacy statements.

11.0 - You may “opt-out” of receiving direct marketing material

11.1 – From the information we obtain from you we use some of it to keep you informed of other products, services or opportunities that may be of interest to you or help you achieve your investment objectives.

11.2 – If you do not want your personal information to be used for these purposes, please contact us using the contact details above.

11.3 – Please note that you can withdraw consent, without any charge, by contacting us at any time.

11.4 – we will not disclose information about you to third parties for direct marketing purposes.

12.0 – Email address

12.1 – Unless otherwise specified in this Privacy Policy if you provide us with your email address during a visit to our website it will only be used for the purpose for which you provided it to us. It will not be added to a mailing list without your consent unless the mailing list is directly related to the purpose for which you provided your email address to us. We may use your email address, for example, to provide you with information about a particular service or product or to respond to a message you have sent us.

12.2 – If you subscribe to one of our services you provide your email address to us so we may communicate with you through email, we may also use your email address to advise you of upgrades and changes to those services.

13.0 – Security and retention policies

13.1 – Horizons is committed to ensuring the security of personal information that we hold about you. We take reasonable steps to ensure the personal information we hold about you is stored securely, whether in a physical or electronic form. Some of the ways we do this are:

- Confidentiality requirements of our employees, agents and authorised representatives;
- Document storage security policies;
- Security measures for access to our systems;
- Only giving access to personal information to a person who is verified to be able to receive that information; and
- electronic security systems such as firewalls and data encryption on our websites.

13.2 – If you use the internet to communicate with us you should be aware that there are inherent risks in transmitting personal information over the internet. Horizons does not have control the transfer of personal information over the internet and we cannot guarantee its security.

14.0 – Complaints

14.1 – If you have a complaint about our treatment of your privacy, please contact our Compliance Officer using the contact details above. Our Compliance Officer will investigate your complaint and endeavour to resolve any issue to your satisfaction.

15.0 – Consent

15.1 – If you do not consent to the use or disclosure of your personal information in the manner indicated above or in our Privacy Policy as amended from time to time, contact our Compliance Officer using the details provided above.