



ABN 99 080 135 913

## **FLAGSHIP INVESTMENTS LIMITED**

### **PRIVACY POLICY**

Flagship Investments Limited (referred to in this policy as **FSI, we, us, our**) understands and appreciates that you, are concerned about the confidentiality and security of information Flagship Investments Limited may collect about you. FSI is committed to providing you with information on our services within a secure and confidential on-line environment. The Privacy Act 1988 (Cth) (Privacy Act) and the Australian Privacy Principles (APPs) govern the way in which we must manage your personal information and this policy sets out how we collect, use, disclose and otherwise manage personal information about you.

#### **WHAT INFORMATION WE COLLECT FROM YOU**

We may collect and hold personal information about you, that is, information that can identify you, and is relevant to providing you with the services you are seeking. Any personal information we collect will be used only in accordance with this Privacy Policy. In particular, we may collect:

- (a) Your name;
- (b) Your contact details (including your phone number, address and email address);
- (c) Financial information relating to your investments with us (including Tax file number and bank account details);
- (d) If you access or use our website (**Site**), the date and time of your visit, the pages viewed, and information downloaded.

#### **PURPOSE OF COLLECTION**

The personal information that we collect and hold about you, depends on your interaction with us. Generally, we will collect, use and hold your personal information if it is reasonably necessary for, or directly related to the performance of our functions and activities and for:

1. The purpose of enabling FSI to provide services or information to you or someone you know in accordance with your requests or reasonable expectations;
2. The purposes of enabling FSI to undertake research, planning, product development, risk assessment, risk modelling and marketing;
3. Providing you with information about other services that we, or our related entities and other organisations that we have affiliations with, offer that may be of interest to you;
4. Facilitating our internal business operations, including the fulfilment of any legal requirements;

any other purpose required by or to the extent permitted by law.



## **METHOD OF COLLECTION**

FSI have outsourced share registry functions to Boardroom Pty Limited, therefore personal information will be collected directly through the use of Boardrooms' standard forms and computer systems. (Please note Boardroom Pty Limited have published their own privacy policy in relation to information they collect. It can be found [here](#)). FSI will generally collect information directly from you through the use of our standard forms, over the internet, via email, or through a telephone or face to face conversation with you. There will also be instances where personal information about you is collected indirectly because it is unreasonable or impractical to collect personal information directly from you. We may collect personal information about you from:

- (a) Your broker, accountant, or other financial or legal adviser; and
- (b) EC Pohl & Co Pty Ltd, who manage our portfolio.

We will usually notify you about collection of your personal information from third parties in advance, or where that is not possible, as soon as reasonably practicable after the information has been collected.

## **FAILURE TO PROVIDE INFORMATION**

If the personal information you provide to us is incomplete or inaccurate, we may be unable to provide you, or someone else you know, with the services you, or they, are seeking.

## **USE AND DISCLOSURE OF INFORMATION**

Generally, we only use or disclose personal information about you for the purposes for which it was collected (as set out above). We may disclose personal information about you to:

- (a) Service providers, who assist us in operating our business (such as Boardroom Pty Limited, EC Pohl & Co Pty Ltd, and our auditors), and these service providers may not be required to comply with our privacy policy;
- (b) Our related entities and other organisations with whom we have affiliations, so that those organisations may provide you with information about services and various promotions.

You should note that information we collect from you may also be disclosed to third parties if that disclosure is required by or to the extent permitted by law.

## **SECURITY OF YOUR INFORMATION**

Flagship Investments Limited takes reasonable steps to preserve the security of personal information it collects via the Site. FSI cannot ensure or warrant the security of any information you transmit to us or receive from our online products or services and you do so at your own risk. Once we receive your transmission, we take reasonable steps to preserve the security of information on our own system and protect it from interference, misuse, loss, unauthorised access, modification or disclosure, including electronic and physical security measures.

From time to time the Site may contain links to other websites, and FSI is not responsible for the privacy practices or the content of these websites and linked websites are not subject to our privacy policies and procedures.



## **DATA BREACH NOTIFICATION**

The Privacy Amendment (Notifiable Data Breaches) Act 2017 requires us, in the event of a data breach, such as the unauthorised loss, use or disclosure of personal information, to assess and respond in line with our applicable policies and procedures. We have an obligation to report data breaches to the Office of the Australian Information Commissioner (OAIC) in certain circumstances. In the unlikely event that we have to notify the OAIC we will also notify the individuals affected.

## **INTERNET USERS**

If you access our Site, we may collect additional personal information about you in the form of your IP address and domain name.

Our Site uses cookies. A cookie contains information about your visit to the Site. When you visit the Site again, our server will look for the cookie and structure itself based on the information provided. A cookie identifies your computer to our web server when you visit the Site. We do not use the cookie to store personal information about you. FSI uses browser cookies to improve the speed and reliability of our security system. It is recommended that you turn off any cookie warnings in your browser before using this Site, otherwise you may not be able to use the full functionality of this Site.

## **ACCEPTANCE AND CHANGES TO PRIVACY STATEMENTS**

You acknowledge and accept that your use of the Site indicates your acceptance of this Privacy Policy. This Privacy Policy may change from time to time. Any information collected after an amended Privacy Policy has been posted on this Site will be subject to that amended Privacy Policy.

## **ACCESS AND UPDATING OF INFORMATION**

You are able to access and update the personal information that we hold about you at any time, upon making a written request. We will respond to your request within a reasonable period. We may charge you a reasonable fee for processing your request (but not for making the request for access). We may decline a request for access to personal information in circumstances prescribed by the Privacy Act, and if we do, we will give you a written notice that sets out the reasons for the refusal (unless it would be unreasonable to provide those reasons).

If, upon receiving access to your personal information or at any other time, you believe the personal information we hold about you is inaccurate, incomplete or out of date, please notify us immediately. We will take reasonable steps to correct the information so that it is accurate, complete and up to date.

If we refuse to correct your personal information, we will give you a written notice that sets out our reasons for our refusal (unless it would be unreasonable to provide those reasons), including details of the mechanisms available to you to make a complaint.

To amend personal information that Flagship Investments Limited holds you should contact our share registry Boardroom Pty Limited, Investor Enquiries on 1300 737 760.





## HOW YOU CAN CONTACT US

If you have any questions or feedback about this statement or any privacy issues concerning FSI, please contact the Privacy Officer, Flagship Investments Limited, PO Box 7536, Gold Coast MC QLD 9726 at any time in writing or send an e-mail to [contact@flagshipinvestments.com.au](mailto:contact@flagshipinvestments.com.au)

If you wish to make a complaint about a breach of the Privacy Act, the APPs or a privacy code that applies to us, please contact us using the details above and we will take reasonable steps to investigate the complaint and respond to you.

If after this process you are not satisfied with our response, you can submit a complaint to the Office of the Information Commissioner. To lodge a complaint, visit the 'Complaints' section of the Information Commissioner's website, located at <http://www.oaic.gov.au/privacy/privacy-complaints>, to obtain the relevant complaint forms, or contact the Information Commissioner's office.

For more information about privacy in general, you can visit the Office of the Information Commissioner's website at [www.oaic.gov.au](http://www.oaic.gov.au).

Last Reviewed 4 November 2022