

## Dominium Capital Group

### Privacy Policy

01 July 2020

Dominium Capital Group is committed to client service and this policy outlines our ongoing obligations to you in respect of how we manage your Personal Information.

Dominium Capital Group is bound by the Australian Privacy Principles (**APPs**) contained in the Privacy Act 1988 (Cth) (**Privacy Act**). The APPs are designed to protect the confidentiality of information and the privacy of individuals by regulating the way personal information is collected, used, disclosed and managed. Personal information is, generally speaking, information or an opinion relating to an identified, or reasonably identifiable, individual.

This policy explains the types of personal information that we may collect and hold, how that information is used and with whom the information is shared. It also sets out how you can contact us if you have any queries or concerns about this information.

#### Why do we collect personal information?

Dominium Capital Group collects your personal information so that we can perform our various functions and activities. Dominium Capital Group also collects your personal information if the law requires us to collect it. If Dominium Capital Group does not collect your personal information, we may not be able to deal with you, or provide you with a product or service.

Dominium Capital Group collects most personal information directly from you. For example, you provide us with your information when you open an account, fill in an application form, deal with us over the telephone, send us a letter, use our websites or visit our office. If you apply for products or services, Dominium Capital Group may collect and hold information from you such as your name, address, telephone number, e-mail address, tax file number (TFN), date of birth, annual income and other financial details, place of work, credit history, and your transaction history.

#### Collecting information from third parties

Dominium Capital Group may also collect information about you that is publicly available, including information from telephone directories, the electoral roll or other websites.

There may be occasions when Dominium Capital Group collects personal information about you from a third party. For example, Dominium Capital Group may collect personal information from:

- Credit reporting bodies if we request a report about your credit history;
- Other credit providers if we request information from them about the products they provide to you;

- Organisations that Dominion Capital Group has an arrangement with to jointly offer products and/or has an alliance with to share information for marketing purposes to provide you with products or services and/or to promote a product or service;
- Our related entities so we can better manage your relationship with all Dominion Capital Group companies;
- Marketing companies if we acquire contact information to tell people about Dominion Capital Group products and services that may interest them; and
- Other parties who may have introduced you to Dominion Capital Group.

Dominium Capital Group does not use cookies on our website(s).

### **Collecting sensitive information**

Sensitive information is personal information about a person's racial or ethnic origin, political opinion, 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, genetic information or health information.

Dominium Capital Group will not collect, use or disclose sensitive information about you unless we need the information for one of our functions or activities and we have your consent (or we are legally required to do so).

For example, Dominion Capital Financial Advisers often collects health information from you, with your consent, to assist you in applying for life insurance. Any chosen insurer that Dominion Capital Financial Advisers deals with may also collect information about you if your family members apply for products such as life insurance or trauma and disablement cover.

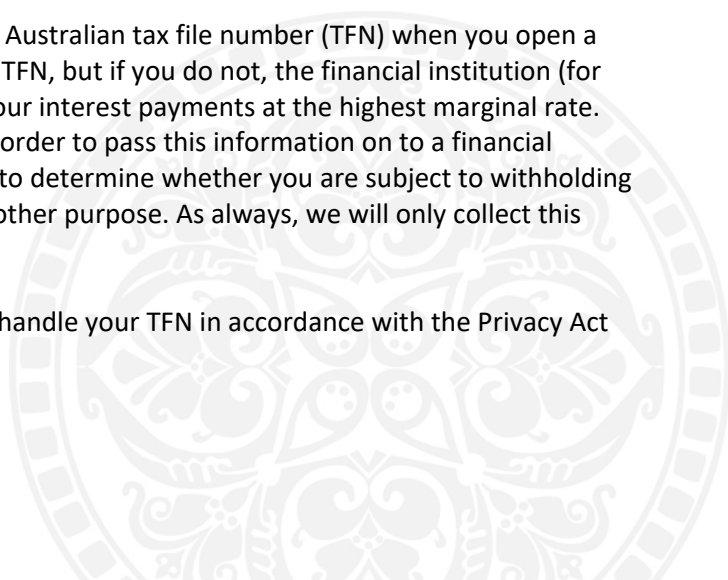
### **Collecting information required by law**

Dominium Capital Group may collect information from you because we are required or authorised by an Australian law or court or tribunal order to collect that information. We will tell you if collection is required or authorised by law and provide you with details of the law, court or tribunal order.

For example, when you open a deposit account or take out a loan, Dominion Capital is required under the Anti-Money Laundering and Counter-Terrorism Financing Act to collect certain information from you to prove your identity, such as your driver's licence or passport details.

Dominium Capital Group companies may collect your Australian tax file number (TFN) when you open a deposit account. It is not compulsory to provide your TFN, but if you do not, the financial institution (for example, a bank) may deduct withholding tax from your interest payments at the highest marginal rate. Dominion Capital Group will only collect your TFN in order to pass this information on to a financial institution, for the purposes of that entity being able to determine whether you are subject to withholding tax on any interest payments you receive and for no other purpose. As always, we will only collect this information with your consent.

If Dominion Capital Group collects your TFN, we will handle your TFN in accordance with the Privacy Act and Guidelines issued by the Commissioner.



The National Consumer Credit Protection Act 2010 requires entities which provide credit assistance and advice, like Dominion Capital, to make inquiries into the financial situation, needs and objectives of individuals who apply for consumer credit. This is to ensure the credit provider has the information – such as the individual's financial commitments, income and liabilities - to make an informed decision about whether the individual can afford the credit they are applying for.

Dominium Capital Group may also be required to ask about your tax residency status under taxation information sharing agreements the Australian Government has in place with other countries. For example, a tax treaty between Australia and the United States formed under US law (Foreign Account Tax Compliance Act) requires Australian financial institutions and fund managers to ask account holders of some types of products whether they are US citizens or US tax residents when they open their product. If you are a tax resident of another country, the relevant treaty or law may require us to collect your relevant foreign tax identification number.

### **Using your personal information**

We may use and disclose personal information we collect about you for several purposes including:

- To consider your request for a product or service;
- To enable Dominion Capital Group to provide a product or service;
- To tell you about other products and services that may be of interest to you;
- To manage accounts and perform other administrative and operational tasks (including risk management, systems development and testing, credit scoring and staff training, collecting debts and market or customer satisfaction research);
- To consider any concerns or complaints you raise against Dominion Capital Group and/or to manage any legal action between you and Dominion Capital Group, its associates and or other related entities;
- To prevent or investigate any actual or suspected fraud, unlawful activity or misconduct;
- To identify you or establish your tax status under any Australian or foreign legislation, regulation or treaty pursuant to an agreement with any tax authority; and
- As required by relevant laws, regulations, codes of practice.

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

Dominium Capital Group does not generally disclose your information to any overseas parties.

Dominium Capital Group will not send your personal information to a recipient outside Australia without obtaining your consent or otherwise complying with the APPs.

For the purposes of communicating and marketing information and offers to our clients, Dominion Capital Group does (as at the date of this document) use the services of a bulk email service provider, which necessitates the storage of client information (first name, surname and email address(s)) on the service provider's secure servers located in the United States. Dominion Capital Group has taken reasonable steps to seek undertakings from our service providers to ensure that client information deleted from the service provider in the United States will not be stored or made available for future retrieval from any party (including the service provider) at any future time and that the information is unable to be restored by that provider. Additionally, Dominion Capital Group uses the services of United States based company, Alphabet, through their G Suite and Drive application, to operate our servers remotely and these servers are located in several offshore locations. Our data backup and recovery provider is also located in the

United States. We have also taken reasonable steps to ensure the security and privacy of our clients are adhered to by these service providers. Additionally, we may use the service of providers in the following countries, including: Canada, Malaysia, India, Ireland, the United Kingdom, Singapore, Taiwan, Netherlands, Finland, Belgium and the Philippines.

### **Security and management of personal information**

Dominium Capital Group will take reasonable steps to protect the personal information we hold from misuse and loss and from unauthorised access, modification or disclosure. The ways we do this include:

- limiting physical access to our premises;
- limiting access to the information we collect about you (for instance, only those of our personnel who need your information to carry out our business activities are allowed access);
- requiring any third party providers to have acceptable security measures to keep personal information secure; and
- putting in place physical, electronic, and procedural safeguards in line with industry standards.

If we no longer require your personal information and are not legally required to retain it, Dominium Capital Group will take reasonable steps to destroy or permanently de-identify the personal information.

### **Links from our website to other websites**

Our website may contain links to third party websites. We do not operate these websites and therefore are not responsible for the collection or handling of personal information by the operators of these websites.

### **Accessing the information we hold about you**

Under the APPs, you may be able to obtain a copy of the personal information that we hold about you. The APPs provide some exceptions to your rights in this regard. To make a request to access this information, please contact us in writing. We will require you to verify your identity and specify what information you require.

### **Updating your personal information**

We endeavour to ensure that the personal information we hold about you is accurate, complete and up-to-date. Please contact Dominium Capital Group at the contact address set out below if you believe that the information we hold about you requires correction or is out-of-date.

### **European Union General Data Protection Regulation (GDPR)**

- If you reside in a country that is a member of the European Economic Area (the EU and Norway, Lichtenstein and Iceland), in addition to the protection you receive under the Privacy Act, you are entitled to other protections provided by the GDPR, including, in certain circumstances, the right to:
  - have your personal information erased
  - access your personal information in an electronic and portable format
  - restrict or object to the processing of your personal information.

### **Updates to this Policy**

This Privacy Policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and practices and the changing business environment. The current version of this Privacy Policy is available at: [www.dominiumcapital.com.au](http://www.dominiumcapital.com.au)

### **Complaints**

If you are concerned that we have not complied with your legal rights or applicable privacy laws, you may bring a complaint internally through our complaints process or you may decide to make a formal complaint with the Office of the Australian Information Commissioner ([www.oaic.gov.au](http://www.oaic.gov.au)) (which is the regulator responsible for privacy in Australia).

We will deal with complaints as follows:

#### **Step 1: Please let us know**

If you would like to make a complaint, you should let us know by contacting our Privacy Officer (see below for contact details).

#### **Step 2: investigation of complaint**

Your complaint will be investigated by our Managing Director and our Complaints Manager. A response to your complaint will be provided in writing within a reasonable period.

#### **Step 3: contact OAIC**

We expect our procedures will deal fairly and promptly with your complaint. However, if you remain dissatisfied, you can also contact the Office of the Australian Information Commissioner as follows:

Office of the Australian Information Commissioner (OAIC)  
Telephone: 1300 363 992

*Complaints must be made in writing.*

Director of Compliance  
Office of the Australian  
Information Commissioner  
GPO Box 5218  
Sydney NSW 2001  
[www.oaic.gov.au](http://www.oaic.gov.au)



## Contact us

You can lodge a complaint with us about any breach of our Privacy Policy and our privacy obligations to you by contacting us and if you have any queries about our Privacy Policy please contact our office.

(Post) PO Box 532, Carlton North, VIC, 3054, AUSTRALIA

(T) +613 9607 8294

(e) [enquiries@dominiumcapital.com.au](mailto:enquiries@dominiumcapital.com.au)

(w) [www.dominiumcapital.com.au](http://www.dominiumcapital.com.au)

