

# Whitehaven Private Portfolios – Privacy Policy

## Introduction

Whitehaven Private Portfolios Ltd recognises the importance of the personal information we hold about individuals and the trust they place in us.

By explaining our privacy policy to you, we hope that you will better understand how we keep personal information private and secure while using it to provide services and products. 'Personal information', for the purposes of this policy, is information about, and which identifies, individuals, whether that information is obtained from the relevant individual or from a third party.

This privacy policy applies to the operations of Whitehaven unless specifically stated otherwise. For these purposes, Whitehaven includes Whitehaven Private Portfolios Ltd and other related bodies corporate. In this policy, the members of this group are individually and collectively referred to as 'Whitehaven', 'we' or 'us'.

We are committed to safeguarding your personal information in accordance with the requirements of the Australian Privacy Principles of the Privacy Act 1988.

In general, we will not use or disclose such information collected about you otherwise than for the purposes set out in this policy, for a purpose you would reasonably expect, a purpose required or permitted by law, or a purpose otherwise disclosed to, or authorised by you.

We may, in connection with particular services we offer or provide to you, make other privacy disclosures to you or seek your authority to use your personal information in ways which are different from or more specific than those stated in this privacy policy. In the event of any inconsistency between the provisions of this privacy policy and those additional materials, the provisions of the additional materials will prevail.

## Collection of personal information

Whitehaven collects personal information that we believe is necessary to deliver our services or products or otherwise for our primary business functions and/or activities.

Ordinarily we only collect information about you when you provide it to us or it is provided to us with your authority.

Whitehaven only collects personal information by lawful and fair means and not in an unreasonably intrusive way. The types of personal information we collect generally include your name, address, telephone number, email address, financial information, other contact or identification details and, in some cases, information necessary to make or receive payments to or from you or necessary to effect transactions in financial products on your behalf.

We will collect personal information directly from you when you apply for a product or a service, deal with us as a key contact or employee of a client, deal with us over the telephone or in person, send us a letter or visit our website, [www.whitehavenpp.com.au](http://www.whitehavenpp.com.au). On occasions, we may collect personal information about you from third parties, for example, share registries, ASIC or credit reporting agencies.

We keep personal information in physical and electronic records, at our premises and the premises of our service providers, which may include storage on the cloud. Where this occurs, we take steps to protect personal information against misuse or loss.

Apart from the necessity to collect your information in order to provide a service to you or maintain our relationship with you, the purposes for which we would generally collect and use your personal information will include:

- complying with legislative and regulatory requirements;
- performing our administrative operations, including accounting, risk management, record keeping, archiving, systems development and testing and staff training;
- conducting market or customer satisfaction research;
- inviting you to other events that may interest you;
- developing and identifying products and services that may interest you; and
- (unless you ask us not to) telling you about other products and services we offer.

## Personal information about third parties

If at any time you supply us with personal information about another person, you should ensure that you are authorised to do so and you must agree to inform that person who we are, that we will use and disclose that personal information, and that they may gain access to it should we hold that information.

## Use and disclosure of personal information

You authorise Whitehaven to disclose necessary information to related companies, affiliates and any agents or contractors who provide services to us in connection with the provision of products or services you have sought from us. These parties are prohibited from using your personal information except for the specific purpose for which we supply it to them.

Subject to what is permitted by law, the types of third parties we may disclose your personal information to include:

- our agents, contractors, insurers and external advisers we engage from time to time to carry out, or advise on, our functions and activities;
- any third party service providers who assist us to provide, manage or administer our products or services such as custodians, auditors, insurers, external dispute resolution providers or mail houses;
- any person or organisation who introduces you to us;
- regulatory bodies, government agencies, law enforcement bodies and courts;
- debt collection agencies;
- other financial institutions; and
- any person to the extent necessary, in our view, in order to carry out the instructions you give to us.

In some cases, we may need to transfer your personal information outside Australia. If we believe that the overseas third party is not subject to, or has not agreed to comply with, privacy obligations equivalent to those which apply to us, we will seek your consent to transfer the information, except where the Australian Privacy Principles do not require us to do so.

## Whitehaven website

Our compliance with the Australian Privacy Principles also extends to when you transact business via our website. Our website terms and conditions and any privacy notices are clearly posted on all pages of the website.

When you use a link from the Whitehaven website to the websites of third parties, those websites are not subject to Whitehaven privacy standards. Those third parties are responsible for informing you of their own privacy policies.

User names and passwords are required to access those areas of our website that are restricted to clients. You are reminded that these user names and passwords are strictly for your personal use only. You are responsible for all acts that result from any use of your user name and password, whether authorised or not, or that result from your failure to maintain security. You must notify us immediately if you consider that the security of your user name and password has been breached. For statistical purposes we collect information on website activity (such as the number of users who visit the website, their country, the date and time of visits, the number of pages viewed, navigation patterns and the operating systems and browsers used to access the site). This information on its own does not identify an individual but it does provide us with statistics that we can use to analyse and improve our website.

## Access to your personal information

If at any time you wish to know what personal information we are holding about you, you are welcome to ask us for your details by writing to us in a form or manner which identifies the nature of the personal information requested. The appropriate contact is:

Privacy Officer  
Whitehaven Private Portfolios Ltd  
PO Box 259

Fortitude Valley QLD 4006  
Email: [admin@whitehavenpp.com.au](mailto:admin@whitehavenpp.com.au)

Under certain circumstances we may not be able to tell you what personal information we hold about you. This includes where the information:

- would have an unreasonable impact on the privacy of another individual;
- relates to legal proceedings with you;
- would reveal a commercially sensitive decision-making process; or
- prevents us by law from disclosing the information, or providing access which would prejudice certain investigations.

We may charge a fee for accessing your personal information.

We will take reasonable steps to ensure that your personal information is accurate, complete and up to date.

If at any time, you find that current personal information we hold about you is inaccurate, incomplete or out of date, please contact your Adviser or our Privacy Officer immediately and we will correct it.

## Security of your personal information

Whitehaven will take reasonable steps to protect the personal information we hold from misuse and loss, and from unauthorised access, modification or disclosure. In line with our internal authorisation and access policies, employees only have access to information on a need to know basis.

Whitehaven takes reasonable steps to destroy or permanently de-identify personal information if it is no longer needed.

However, no data transmission over the internet can be guaranteed as fully secure and we cannot guarantee or warrant the security of any information you send to us over the internet. You submit information over the internet at your own risk.

## Direct marketing

We may use your personal details, including your address, to provide you with newsletters and information about products, services or other events that may be of interest to you.

If at any time you do not wish to receive such marketing information, you have the option to ask us not to send you any further such material – you may do so by writing to your Adviser or our Privacy Officer.

## Identifiers

Whitehaven will not adopt as its own identifier that has previously been assigned by a government agency (or by an agent of, or contractor to, a government agency or contracted service provider for a Commonwealth contract). We will only use and disclose such identifiers for purposes required by law.

## Complaints

If you believe that the privacy of your personal information is not being adequately protected, you should contact our Privacy Officer. We will make every effort to resolve your complaint internally.

If we do not resolve your complaint to your satisfaction, you may apply to the Office of Australian Information Commissioner to have your complaint investigated or the Australian Financial Complaints Authority of which we are a member. For more information about how you may lodge a complaint with the Office of Australian Information Commissioner, please contact the Commissioner's hotline service on 1300 363 992 or visit their website at [www.oaic.gov.au](http://www.oaic.gov.au).

## Changes to this privacy policy

Please note that this privacy policy may change from time to time. You may at any time request a current copy from our Privacy Officer or access it from our website at [www.whitehavenpp.com.au](http://www.whitehavenpp.com.au). We encourage you to review our privacy policy periodically for any changes.

## Need more information?

If you have a query concerning how your personal information is collected and used or regarding Whitehaven privacy policy, please contact our Privacy Officer at [admin@whitehavenpp.com.au](mailto:admin@whitehavenpp.com.au). Additional information, including the Australian Privacy Principles, may be found on the Federal Privacy Commissioner's website at [www.oaic.gov.au](http://www.oaic.gov.au).