

EAST GLOBAL FINANCE – PRIVACY POLICY

At East Global Finance Pty Ltd (ACN 651 345 345) (“**East Global Finance, we, us, our**”), we are committed to protecting your privacy.

This Privacy Policy describes how we manage your personal information, including:

- the kinds of personal information we collect;
- the purposes for which we collect personal information;
- how we hold, use and disclose the personal information that we collect;
- how you can seek access to and correction of your personal information; and
- if necessary, how you can make a complaint relating to our handling of that information.

By using our products and services (including our website) or by providing your personal information to us, you agree to the terms of this Privacy Policy.

What is “personal information”?

Personal information is information about an individual who is identified or reasonably identifiable (for example, your name and date of birth).

1 Collection

What information we collect

We may collect and hold some, or all, of the following personal information about you:

- identifying information such as your name, date of birth and country of residency;
- contact details such as your postal address, email address and phone number;
- any Australian or foreign government related identifier allocated to you (e.g. Tax File Number, or Australian passport, drivers licence, or Medicare card number);
- records of our communications with you, such as telephone, email, SMS, online and in-person communications;
- information about your use of our online services (such as your location information and IP address);
- any other information that is capable of identifying you.

It is up to you to choose the information that you provide to us. If you choose not to provide information to us, we may not be able to provide you with the service you have requested.

Why we collect your information

The personal information that we collect is necessary to allow you to access and use our website and to deliver our services. Any personal information we collect about you may be used for the following purposes:

- to assess and process applications for our services;
- to provide, and administer, our services;
- to run and operate our website;
- to improve our services to any client or to improve our business (for example, by reviewing feedback about our services);

- to let you know of other products and services that are offered by us or our affiliates that may be of interest to you or to any other person on whose behalf you are acting (see “*Direct marketing and research*” below);
- to enable us to resolve any complaint or dispute with any client you have a connection with; and
- to comply with our legal and regulatory obligations, including to confirm your identity, investigate financial crime, or to share relevant information with law enforcement agencies, tax authorities and other regulatory bodies. In particular, we may collect your personal information in order to comply with our obligations under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) (for example, to comply with applicable customer identification procedures).

How we collect your information

We collect personal information in a number of ways, including:

- directly from you, when you fill in any form on our website or provide information by web portal or email or phone or in documents you provide to us;
- from our clients (for example, our clients may provide personal information about individuals connected to their business); or
- by searching publicly available information (for example, the internet and company reports).

Where we collect your personal information from third parties, we will take reasonable steps to notify you of the circumstances of that collection. We recommend you review our website regularly to see updates to this policy.

2 Disclosures

To whom do we regularly disclose your information?

We may share your personal information with third parties for the reasons mentioned above, or where the law otherwise allows or requires us to. We may disclose personal information to the following third parties:

- our employees, contractors and agents (e.g. people who are authorised to administer our computer systems and IT systems), professional advisers, consultants and representatives;
- our service partners, external service providers and other organisations that help us to supply our services;
- you, your agents and others you have authorised to interact with us on your behalf;
- government regulatory agencies, bodies and authorities as required by law;
- third parties that can verify your information (for example, commercially available third party databases);
- any purchasers of all or part of our business.

We may, from time to time, disclose your personal information to a contracted service provider located outside of Australia. In particular, we may disclose personal information to service providers located in the USA in connection with storage of information on the cloud and digital execution of documents, and to a service provider in the UK who runs our banking platform.

3 Holding Information

We may hold your personal information on the cloud or other types of electronic system, on servers located in Australia, the USA and the UK.

The security of your personal information is important to us. We maintain reasonable administrative, technical, and physical safeguards and measures to protect the information that we hold about you.

These security measures include imposing controls on information access, providing training to staff about information security and monitoring compliance with our information security standards. In some cases we may engage third party storage providers to host our electronic data on our behalf.

We will only hold your personal information for as long as it is required for the purpose for which it was collected or as required by law. If your information is no longer required, we will take reasonable steps to de-identify or destroy your personal information that is in our possession or control.

4 Access and Correction

We take reasonable steps to ensure that all personal information we collect, hold, use and disclose is accurate, complete and up-to-date. The *Privacy Act 1988* (Cth) (**Privacy Act**) gives you the right to request access to and the correction of your personal information at any time (subject to certain exceptions allowed by law).

You can request access to, or request for correction of, your personal information by contacting the Compliance Officer using the details set out below:

- Phone: +61 2 9145 0268
- Email: info@eastglobalfinance.com
- Address: Commercial Suite 1, 636-638 New South Head Road, Rose Bay NSW 2029

Please address your correspondence, or ask to speak to, our Compliance Officer.

Any request for information must be as specific as possible so we can accommodate the request. For security reasons, you may be required to put your request in writing.

We will respond to your request for access or correction within 30 days (however note that in some circumstances it may take longer to respond to your request). If your request is refused for any reason, we will give you a written notice with the reasons why your request has been refused and your options in respect of our decision on next steps you can take. There are circumstances where we are entitled to refuse your request (for example, where granting access would be unlawful or would prejudice law enforcement activities). You may also request us to associate a statement with that information to the effect that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading so that it is apparent to users of the information.

5 Direct marketing and research

We may use and disclose your information for marketing purposes. We may contact you about our products and services (including our website), the products and services of other people, or related special offers from our business partners, that we think may be of interest to you. The information may be sent to you by email, SMS or other means.

You can opt-out of receiving marketing communications from us at any time by clicking the 'unsubscribe' link in the communication or by contacting us using the details set out below under 'Questions or Concerns'.

6 Changes we can make to this Privacy Policy

We may make changes to this Privacy Policy from time to time to take into account changes to our standard practices and procedures or where necessary to comply with new laws and regulations. The latest version of this Privacy Policy will always be available on our website at: www.eastglobalfinance.com. The updated version will apply from the date stated at the end of the Privacy Policy.

7 Questions or Concerns

If you believe that we have not complied with our obligations under the Privacy Act or you would like to discuss any issues about our Privacy Policy or raise any specific or general concerns, please contact our Compliance Officer in writing. The contact details are as follows:

- Email: info@eastglobalfinance.com
- Address: Commercial Suite 1, 636-638 New South Head Road, Rose Bay NSW 2029

We will acknowledge your concern or complaint within 10 days of receipt and provide you with written notice of any action we take in respect of your concern or complaint within 30 days.

If you are not satisfied with the way we have handled your concern or complaint, or would like more information about privacy in general, you can visit the Office of the Australia Information Commissioner's website at: <https://www.oaic.gov.au/privacy/privacy-complaints>.

Date updated: 21 May 2022