

Privacy Policy

Australian Financial Freedom Pty Ltd T/A Managed Portfolios ABN 91 139 960 080 (referred to as "Managed Portfolios", "we" and "us") recognises that the privacy of your personal information is important. We are committed to protecting personal information we collect. This policy describes how we handle personal information, how you can access or correct information we hold, and how to contact us. It is available on our website at www.managedportfolios.com.au, or on request.

1. Regulatory references

- Privacy Act 1988 (Cth) and the Australian Privacy Principles
- Notifiable Data Breaches scheme (Part IIIC of the Privacy Act)

2. What personal information do we collect?

We collect personal information that is reasonably necessary to provide our MDA Service and related portfolio administration. This may include:

- personal details (name, date of birth, contact details, occupation, bank details, tax file number);
- financial details (income, assets, liabilities, superannuation, investments, insurance);
- information about your objectives, risk tolerance and financial needs;
- records of communications with you, your adviser, or any financial services firm acting for you; and
- information required to meet our regulatory obligations (for example, identity verification).

3. Why do we collect, hold, use and disclose personal information?

- to provide MDA and related financial services;
- to enable your adviser and approved Portfolio Managers to manage your portfolio;
- to comply with our obligations under the Corporations Act, ASIC regulatory guidance, the AML/CTF Act and other applicable laws;
- to conduct administration, audits, risk management and quality assurance;
- to communicate with you about your account, our services and relevant updates;
- where permitted, to inform you of financial services that may be relevant to your needs.

If you do not provide the information we request, we may not be able to provide services or meet our legal obligations.

4. How do we collect personal information?

- directly from you, through forms, meetings, phone calls, email or online services;
- from your adviser;
- from approved Portfolio Managers and other parties engaged in managing your account;
- from third parties such as product issuers, custodians, registries and verification providers, where you have authorised disclosure; and
- from publicly available sources, as permitted by law.

5. How do we hold personal information?

We take reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, modification or disclosure. Information is held primarily in secure cloud-based systems with controlled access.

Some information may be held in physical form in secure premises. When personal information is no longer required, we take reasonable steps to destroy or de-identify it, unless required by law to retain it. If we become aware of a data breach involving your personal information that is likely to result in serious harm, we will assess it and, where required, notify affected individuals and the Office of the Australian Information Commissioner in accordance with the Notifiable Data Breaches scheme.

6. Access and correction

You may request access to the personal information we hold about you, or request correction if you believe it is inaccurate, out of date, incomplete or misleading. We will respond within a reasonable period and consistent with the Australian Privacy Principles.

7. Concerns and complaints

If you have a concern or complaint about how your personal information is handled, contact us using the details below. We will acknowledge your complaint and seek to resolve it quickly and fairly. If you are not satisfied with our response, you may contact the Office of the Australian Information Commissioner (OAIC) at www.oaic.gov.au.

8. Overseas disclosure

We may disclose personal information to recipients located outside Australia where necessary to provide our services, comply with legal obligations or support our business operations. This may include overseas employees and contractors, external service providers, custodians, technology providers, product issuers and registries. When disclosing personal information overseas, we take reasonable steps to ensure the recipient handles the information consistently with the Australian Privacy Principles. Overseas recipients are currently likely to be located in the United States and Japan.

9. Government identifiers and tax file numbers

We handle government related identifiers, including your tax file number, with particular care. We only use and disclose your tax file number as authorised by law. We do not disclose your tax file number to any third party other than Australian banks and share brokers, and only where this is required in connection with your investments and related tax reporting. We do not disclose your tax file number to overseas recipients. We do not adopt a government related identifier as our own means of identifying you.

10. Anonymity, marketing and unsolicited information

In most cases we cannot provide services unless you provide personal information, because we must comply with regulatory and identification obligations. We may use your personal information to offer you financial services we believe may be relevant. You may opt out at any time. We do not sell or disclose personal information to third parties for marketing purposes. If we receive personal information we did not solicit and it is not necessary for our functions, and it is lawful to do so, we destroy or de-identify it.

11. Third-party verification platforms

We use secure third-party platforms to collect and verify information provided when applying for our services, including identification documents. These providers process information on our behalf, and we take reasonable steps to ensure they handle it securely and in accordance with the Australian Privacy Principles. By submitting an application through our website, you consent to this use of third-party services for collection and verification purposes.

12. Contact

For questions about this policy, to request access to your personal information, or to lodge a complaint, please contact:

- Managed Portfolios — CEO
- PO Box 6048, Wollongong DC NSW 2500
- (02) 4201 7030
- admin@managedportfolios.com.au