



Privacy Policy

15 December 2023



Privacy Policy

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1. Introduction

- 1.1 We respect your right to privacy and are committed to safeguarding the privacy of the personal information of all people with whom we have dealings, including our clients and suppliers, our employees and contractors, any person who applies to be employed or engaged by us and all users of our Site.
- 1.2 We adhere to the Australian Privacy Principles established by the Privacy Act 1988 (Cth) (**Privacy Act**). This Privacy Policy (**Policy**) sets out how and why we collect, hold, use and disclose your personal information, and how we maintain the quality and security of your personal information.
- 1.3 In this Policy:
- (a) **"personal information"** has the same meaning given to it in the Privacy Act, which, in simple terms, means information or an opinion that can be used to identify you;
 - (b) **"Related Entities"** has the same meaning given to in under the Corporations Act 2001 (Cth), which includes a body corporate which is related to Washington H. Soul Pattinson and Company Limited (ACN 000 002 728);
 - (c) **"Site"** means:
 - (i) our website at <http://www.soulpatts.com.au>; and
 - (ii) any other website and application that we own and operate;
 - (d) **"we", "us", and "our"** means Washington H. Soul Pattinson and Company Limited (ACN 000 002 728).
- 1.4 By accessing the Site, using our services or providing us with services, enquiring about or applying for a job with us or otherwise communicating or dealing with us, you consent to the terms of this Policy, including consenting to us collecting, holding, using and disclosing your personal information in accordance with this Policy, and you agree to be bound by this Policy.

2. What personal information we collect and hold

- 2.1 From time to time, we may receive and collect your personal information. Examples of personal information we may collect includes (without limitation):
- (a) your name, date of birth, phone number, address and email address;
 - (b) your social media profiles and online messaging addresses;
 - (c) information relating to your business or employees; and/or
 - (d) other information about how you use or access the Site, including your location at the time of accessing the Site, the pages you have visited, your mobile device's unique device ID and operating system, your IP address, any tracking codes, cookies and the type of internet browser you are using.



3. When we collect your personal information

3.1 Usually, we will collect your personal information from you directly in the following circumstances:

- (a) when you access or use our services or the Site;
- (b) when you become our client, including when you complete any onboarding process;
- (c) when you provide information about your business and/or are engaged to provide services to us, including through any onboarding process;
- (d) when you provide feedback to us or complete a questionnaire, form or survey provided by us;
- (e) when you subscribe to our publications or mailing list or change your content or email preferences;
- (f) when you provide us with your financial or bank account information;
- (g) when we deal with you in person, via email or over the phone, including communicating with our shareholder or supplier support;
- (h) when you attend an event hosted by us;
- (i) when you enquire about, or apply for, a job with us or are employed or engaged by us; or
- (j) if you otherwise correspond with or contact us.

3.2 Where reasonable and practicable to do so, we will collect your personal information only from you. However, in some cases we may also receive and collect personal information about you from third parties, including (without limitation):

- (a) any of our Related Entities;
- (b) publicly available sources of information;
- (c) third party providers of due diligence services including, but not limited to, know your customer verification services (**Due Diligence Providers**);
- (d) third party online advertisers (**Online Advertisers**);
- (e) third party payment providers (**Payment Providers**); and
- (f) if you apply for a job with us, your current or previous employer(s), your referees and/or any personal representatives, your financial advisor and/or other organisations and agencies (such as law enforcement, education providers, professional associations or government departments and agencies).



4. Why we collect, hold and use your personal information

4.1 We collect, hold and use your personal information for the following primary purposes:

- (a) providing our services to you and for administrative purposes relating to the provision of those services, including processes involved in onboarding you as a client;
- (b) advising you of new important updates in respect of our Site, services and/or industry updates;
- (c) contacting you to respond to your queries or complaints, seek feedback or conduct surveys;
- (d) improving our marketing and tailoring the information and services we provide to you;
- (e) improving and managing our services or that of our Related Entities, including for conducting development, analytics and business intelligence functions;
- (f) complying with our legal obligations, including to manage and assess our governance and compliance obligations, as well as for quality control and risk management;
- (g) in relation to business purposes, such as an actual or proposed acquisition or merger;
- (h) identifying you and assisting you with our services; and
- (i) processing any enquiry or application by you about a job with us, including pre-employment screening.

4.2 We may also use your personal information for secondary purposes which are closely related to the primary purposes listed above in paragraph 4.1, in circumstances where you would reasonably expect such use or disclosure.

4.3 If you do not provide your personal information to us, we may not be able to provide our services, accept your services, allow you to access the Site, or communicate with you in any way.

5. Who we disclose your personal information to and why

5.1 We may disclose your personal information to:

- (a) our Related Entities, employees, representatives and officers so we can do any of the following (without limitation):
 - (i) provide our services to you or accept services from you;
 - (ii) recommend services to you or recommend your services; or
 - (iii) progress any application made by you for a job with us or to recommend you for a job;
- (b) our external service providers so they can perform services for us, including but not limited to, Due Diligence Providers, Online Advertisers and Payment Providers; and
- (c) our professional advisers, insurers or agents insofar as reasonably necessary for the purposes set out in this Policy or as required by law.



- 5.2 We may also disclose your personal information to other third parties in the following circumstances:
- (a) if we are required or authorised to do so by law (including under the Privacy Act) including, for example, by any court order, subpoena, warrant, during the course of any legal proceeding or in response to a law enforcement agency request;
 - (b) if we sell or transfer our business assets to a third party; or
 - (c) if you have otherwise consented to the disclosure expressly or by implication.
- 5.3 We are not responsible for the privacy practices of the owners or controllers of third party websites or applications.
- 5.4 We may disclose your personal information to recipients which are located outside Australia. These countries can include, but are not necessarily limited to, the United States of America, New Zealand and the Republic of Singapore.

6. How we store and hold your personal information

- 6.1 We store most personal information that we collect in computer systems and databases operated by us or our external service providers, such as third party mail servers and third party cloud storage providers. We may store some personal information in paper files that we store securely.
- 6.2 We are committed to ensuring that all personal information we receive and collect is secure. To prevent unauthorised access, we have put suitable procedures in place to secure personal information, and protect it from misuse, interference, loss, unauthorised access, modification and disclosure.
- 6.3 These procedures include:
- (a) the use of identity and access management technologies to control access to systems on which information is processed and stored;
 - (b) requiring all employees to keep information secure and comply with any relevant policy or procedure;
 - (c) requiring all employees to complete training about information security; and
 - (d) monitoring and reviewing our practices against our own policies and against industry best practice.
- 6.4 Personal information we collect may occasionally be stored, processed in or transferred between third parties located in countries outside of Australia. These countries can include, but are not necessarily limited to, the United States of America, New Zealand and the Republic of Singapore.
- 6.5 Although we take measures to safeguard against unauthorised disclosures of information, we cannot guarantee that any personal information we collect will not be used or disclosed in a manner inconsistent with this Policy.



7. Use of your personal information for marketing

- 7.1 We may use your personal information to offer you services we believe may interest you, but we will not do so if you tell us not to. These products and services may be offered by us, our Related Entities, our business partners or service providers.
- 7.2 Where you receive electronic marketing communications from us, you may opt out of receiving further marketing communications by following the opt-out instructions provided in the communication. However, if you do opt-out from our electronic marketing communications, we may not be able to provide you with our full service.

8. Sensitive Information

- 8.1 Sensitive information is information that relates to topics such as your racial or ethnic origin, political opinions or associations, trade union affiliations, religious or philosophical beliefs, sexual orientation or preferences, criminal record (if any) or health including genetic and biometric information (Sensitive Information).
- 8.2 We do not collect Sensitive Information from you.

9. Third party links

- 9.1 The Site may occasionally contain links to other websites or applications, which we do not own or control, including third party social media features. These links are meant for your convenience only. Links to third party websites or applications do not constitute our sponsorship, endorsement or approval of these third parties.
- 9.2 We cannot ensure the security of any personal information you choose to make public by using a third party website or application. We also cannot ensure that third parties, which may have access to information you share to a third party website or application, will respect your privacy. We are not responsible for the privacy practices of the owners or controllers of third party websites or applications.

10. Cookies

- 10.1 We may from time to time use cookies on the Site. Cookies are very small text files which a website or application may store on your device and which contain information about your interaction with the Site. Cookies are used to identify you when you return to the Site, to improve your experience, by saving browsing information and your preferences, and showing content that is relevant to you.
- 10.2 Most devices automatically accept cookies, but you can choose to reject cookies by changing your device settings. However, this may prevent you from being able to use the full functionality of the Site.

11. Geo-location

- 11.1 When you visit the Site, we may use GPS technology (or other similar technology) to determine your location at the time of your visit, which allows us to display advertisements that are relevant to you. We will not share your current location with other users or partners.



12. Access to and correction of your personal information

- 12.1 You may access or request correction of personal information that we hold about you.
- 12.2 While there is no charge to request access to your personal information, we may require you to pay an administrative fee to meet our reasonable costs to provide access to your personal information (such as photocopying costs or costs for time spent to collate large amounts of material). If you would like access to your personal information or believe that any personal information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us. Our contact details are set out in the 'Our contact details' section below.
- 12.3 We will respond to your requests to access or correct your personal information in a reasonable time and will take all reasonable steps to ensure that the personal information we hold about you remains accurate and up to date.
- 12.4 We may refuse your request to access or correct your personal information if we are permitted to do so under the Privacy Act.

13. Complaints about privacy

- 13.1 If you have any complaints about our privacy practices, including your request to access or correct your personal information, please contact us.
- 13.2 We will consider your complaint and determine whether it requires further investigation. We will notify you of the outcome of this investigation and any subsequent internal investigation.
- 13.3 If you remain unsatisfied with the way we have handled a privacy issue, you may approach an independent advisor or contact the Office of the Australian Information Commissioner (<http://www.oaic.gov.au>) for guidance on alternative courses of action which may be available.

14. Our contact details

- 14.1 If you have any questions, comments, requests or concerns, please contact us by email and/or letter at the details below:

Email: jvirtue@soulpatts.com.au
Subject: Attention: Chief Operating Officer
Level 14, 151 Clarence Street, Sydney NSW 2000

15. Changes to our Policy

We may review and update this Policy from time to time. Each updated version of this Policy will be effective immediately when it is published on the Site. You may obtain a copy of our Policy from our website or by contacting us at the contact details above. Please check back from time to time to review our Policy.



Policy governance

Policy approver:	Board
Policy owner:	Chief Operating Officer
Review cycle:	Periodically

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1.0	Approved by the Board	15 December 2023