

LINARA

Privacy Statement and Policy

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1. PRIVACY STATEMENT

We are committed to providing quality wealth management and family office services to our clients. As part of this commitment, we ensure compliance with the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (Privacy Act).

This Privacy Policy outlines how we collect, hold, use and disclose Personal Information.

"Linara" comprises Linara Wealth Pty Ltd ACN 642 217 007 (Linara Wealth) and Linara Debt Advisory Pty Ltd ACN 676 513 625 (Linara Wealth Debt Advisory) and any legal entity which is a subsidiary of Linara Wealth (where subsidiary has the meaning set out in the Corporations Act 2001 (Cth)).

Except where otherwise stated, references in this notice and elsewhere on this website to "Linara" and to "we" and "us" are references to one or more of the legal entities that comprise Linara Group as the context requires.

1.1. WHAT IS PERSONAL INFORMATION?

The Privacy Act defines Personal Information as information or an opinion about an identified individual who is reasonably identifiable.

The term Personal Information may include a wide range of information, including an individual's name, address, signature, date of birth, credit information, employee records, tax file numbers and other sensitive information.

1.2. WHAT IS SENSITIVE INFORMATION?

Sensitive information is Personal Information that includes information or an opinion about an individual's racial or ethnic origin, religious or philosophical beliefs, political opinions or associations, sexual orientation, criminal record, health or genetic information, trade union membership or associations and some aspects of biometric information.

1.3. OUR COMMITMENT TO YOUR PRIVACY

We are committed to safeguarding the Personal Information that we collect, use and store in the ordinary course of operating our business. We acknowledge the trust that our clients place in us by sharing Personal Information with us, and the importance of honouring that trust by keeping Personal Information secure.

2. PERSONAL INFORMATION

The type of information collected from you includes information necessary for us to provide you with wealth management or family office services, including financial advice, services and products.

In so far as clients of Linara are concerned, we may ask you to provide Personal Information such as:

2.1. WHAT TYPE OF INFORMATION WE WILL COLLECT?

- your full name, date of birth, and contact details including residential address, email address, and telephone number
- identification documents such as drivers' license and/or Passport
- your tax file number and bank account details
- nationality
- business structure and employment information
- your source of wealth
- copies of relevant trust deeds, partnership agreements, certificates of incorporation, constitutions or articles of association
- sensitive information

If you apply for a job with us, we may collect Personal Information such as your education and employment details.

In addition, we may be required to collect and retain Personal Information under the Anti-Money Laundering and Counter Terrorism Financing Act 2006 (Cth), the Foreign Account Tax Compliance Act 2010 (USA) and the Tax Laws Amendment (Implementation of the Common Reporting Standard) Act 2016 (Cth). This could include Sensitive Information.

The Personal Information that is requested of you, will be information that enables us, our strategic partners and other service providers to provide you with services and products. If

you do not provide this Personal Information or consent to the use and store of this information, we may not be able to provide the services and products that you require.

2.2. HOW WE COLLECT PERSONAL INFORMATION

We may collect, use, and disclose Personal Information in a number of ways. Where practical we will collect information directly from you. This may be done directly, via phone, email or other electronic means such as digital forms through our web portals.

In some circumstances we may gather Personal Information about you from other sources, including but not limited to:

- your accountant
- your authorised representatives, executors or administrators
- identity verification providers (such as DVS)
- credit agencies
- government agencies

In the event that a third party provides us with your Personal Information we will assume that you have provided your consent to that third party, unless you inform us otherwise. If you have any concerns with us receiving information from a third party, you should contact us and the third party to address your concerns.

2.3. DOCUMENT VERIFICATION SERVICE (DVS)

2.3.1. *Use of the DVS*

We will use the DVS to confirm that the identification details you provide (e.g., driver licence, passport, or birth certificate) match records held by the relevant government issuing authorities. This is done securely and solely for the purpose of verifying your identity.

2.3.2. *Our Legal Obligations*

We are required to collect and verify identification information under applicable laws and regulatory requirements, including those relating to anti-money laundering (AML), know-your-customer (KYC), and identity verification standards.

2.3.3. *Your Rights*

You have the right to access and request correction of your personal information that we collect and verify. You may also withdraw your consent at any time, although this may affect our ability to proceed with our services.

2.3.4. *Consequences of Declining Consent*

If you do not provide consent for us to verify your identity using the DVS, we may be unable to provide certain services to you or may be required to use alternative (and potentially slower) identity verification methods.

2.3.5. *Making Complaints*

If you have concerns or complaints about how your identification information is collected, used, or disclosed, you may contact the Linara Privacy Officer (details listed below). You can also contact the Office of the Australian Information Commissioner (OAIC) via www.oaic.gov.au.

2.3.6. *More Information About the DVS*

Information about the operation and management of the DVS Hub can be found on the Australian Government's DVS website at www.dvs.gov.au, or by contacting the DVS Framework Administrator.

2.4. WHAT IS THE PURPOSE OF COLLECTING, HOLDING, USING AND STORING PERSONAL INFORMATION?

The purpose of collecting, holding, using and storing Personal Information is so that we may provide you with the services that you require and to meet our regulatory obligations.

In the context of Linara business, the main reasons include:

- establishing and administering investment accounts in Australia and Overseas on your behalf
- to communicate with you
- to comply with our regulatory reporting and tax obligations, or other requests as required or authorised by law
- to ensure that we understand your personal context so that we may provide you with financial advice or financial services
- to process any orders and applications made by you

2.5. STORING YOUR PERSONAL INFORMATION

We may store your Personal Information in either physical or digital form or both. We take reasonable measures to protect it from misuse, unauthorised disclosure, modification or access. We do this in a number of ways including:

- confidentiality requirements for all employees, strategic partners and suppliers
- secure access to electronic and physical Personal Information records
- segregating access to information to only those that require the Personal Information, with consideration to seniority and functional responsibilities
- secure access to our offices
- electronic security using data encryption

You are entitled to request details on how and where your Personal Information is held by Linara. You may do so by contacting Linara's Privacy Officer.

2.6. DISCLOSURE OF PERSONAL INFORMATION

If you are a client of Linara, by providing your Personal Information, you acknowledge and agree that we may provide your Personal Information to any of the following third parties:

- any regulatory or governmental organisation, industry body or any other legal body that governs or regulates our organisation. This may include, amongst others, the Australian Securities and Investment Commission (ASIC), Australian Transaction Reporting and Analysis Centre (AUSTRAC), Australian Financial Complaints Authority (AFCA) or the Australian Taxation Office (ATO).
- any financial market, clearing house, settlement facility, credit provider or credit agency, custodian, share registry or software provider required to provide the services we have committed to you.
- any person for the purposes described in any of our agreements with you including our strategic partners, including but not limited to, Powerwrap Limited, Netwealth Investments Limited, MyProsperity Australia Pty Ltd, and other global wealth management strategic partners.
- any person that you have authorised to act on your behalf including authorised representatives, lawyers, accountants, trustee, guardian or attorney.
- any issuer of a financial product where you have instructed us to purchase the financial product and where its purchase requires disclosing your Personal Information
- our auditors, consultants and other professional advisers.
- any organisation we have engaged in providing, managing, or administering our services. This may include but is not limited to mail houses and software providers.
- our related bodies corporate whether in Australia or any overseas jurisdiction.
- any other third party that you consent to us disclosing your Personal Information to
- or as otherwise permitted by law

2.7. DISCLOSING PERSONAL INFORMATION TO RELATED BODIES

By providing Personal Information to us, you acknowledge and agree that this information may be transferred between related bodies corporate to Linara. These related bodies corporate may be located in Australia or overseas.

2.8. OVERSEAS DISCLOSURE

Linara has arrangements in place with parties in countries outside of Australia.

Clients of Linara are provided with the opportunity to invest with Global Private Banks in other countries, including but not limited to those domiciled in Switzerland, Singapore and Hong Kong.

Your Personal Information may be disclosed to third parties in other countries as required to provide services to you, or as otherwise authorised by you.

In circumstances where we are required to disclose your Personal Information to a jurisdiction that maintains less stringent privacy standards, we will undertake reasonable measures to ensure that the relevant overseas recipient of Personal Information does not breach the Privacy Act or the APPs. If the overseas recipient does handle your Personal Information in breach of the APPs, you will not be able to seek redress under the Privacy Act, nor will we be liable under the Privacy Act.

2.9. KEEPING YOUR INFORMATION UP TO DATE

We rely on the accuracy of the Personal Information provided to us. We aim to ensure that this information is kept up to date through direct contact, digital and other means, however, should you be aware that any of your details with us require updating or amendment, or have any concerns regarding its accuracy, please contact us.

2.10. ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION

If you would like to access the Personal Information that we hold about you, please contact the Linara Privacy Officer.

We will respond to your privacy enquiry promptly and provide appropriate answers where permitted by law. We may charge a reasonable fee for access to Personal Information. Should you find that this Personal Information is inaccurate or requires updating, please contact us so that we may update our records accordingly.

2.11. RESOLVING YOUR PRIVACY CONCERNS

If you are not satisfied with our handling of your Personal Information, please contact Linara in writing with the details of your request with the rectification that you seek. If you are not satisfied with our response to your complaint, you may have the right to complain to:

Australian Financial Complaints Authority
GPO Box 3
Melbourne VIC 3001

e: info@afca.org.au **w:** www.afca.org.au **t:** 1800 931 678

Furthermore, if you remain dissatisfied with the outcome of the complaint following its determination by the Australian Financial Complaints Authority (AFCA) or are not eligible to complain to AFCA, then you may address your concerns to the Office of the Australian Information Commissioner:

Office of the Australian Information Commissioner
GPO Box 5218
Sydney NSW 2001

w: www.oaic.org.au **t:** 1300 363 992

2.12. LINARA PRIVACY OFFICER CONTACT DETAILS

If you have any questions relating to this Privacy Statement, accessing or correcting your personal information, or have any concerns regarding how we have collected, used or stored your personal information, please contact our Privacy Officer at:

The Privacy Officer
Linara Wealth Pty Ltd
1/ 150 Collins St
Melbourne VIC 3000

e: privacy.officer@Linara.group