

## **PRIVACY POLICY**

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This Privacy Policy outlines how Aura Group manages the personal information about clients it may collect, hold, use and disclose. Aura Group are committed to protecting your privacy and the confidentiality of your personal information in accordance with the *Privacy Act 1988* (Privacy Act) and the Australian Privacy Principles, which this policy is based on.

Unless advised otherwise, all references to “Aura Group”, “we”, “us”, or “our” in this Privacy Policy includes, individually and collectively the following Aura Group entities:

- Aura Capital Pty Ltd
- Aura Funds Management Pty Ltd
- Disruptive Capital Pty Ltd
- Aura Partners Pty Ltd
- Aura Legal Pty Limited
- All other related entities including foreign entities within the Aura Group including those added from time to time (other than those who maintain an individual privacy policy).

### **Personal Information Aura Group collects**

Aura Group collects Personal Information that we believe is necessary to deliver our financial products and services (including other professional services such as accounting or legal services), or otherwise for our business functions or activities. Most of this information we are required to obtain in order to satisfy Government requirements. For instance, we are required to confirm your identity for the purposes of the Anti-Money Laundering and Counter Terrorism Financing Act.

Generally speaking, the types of “personal information” (Personal Information) we may collect can include but is not limited to: name; date of birth; address; contact details; bank account details; occupation; employment details; financial needs and objectives; investment preferences and aversion or tolerance to risk; current financial circumstance, including assets and liabilities; income expenditure; family structure, including dependents; tax file number.

Some Personal Information we collect is “sensitive information”. Aura Group will only collect sensitive information about you where it is reasonably necessary for us to receive and we have your consent. Sensitive information is Personal Information that relates to your race, ethnicity, political stance, membership in trade or professional association, criminal records and health records.

Most of the Personal Information that we collect is obtained directly from our clients through application or other forms, and from maintaining records of information obtained in the course of providing our products and services. We may also obtain information from third parties.

In the event of you not providing sufficient information required to fulfill your request for the provision of a product or service, we may be unable to provide you with the product or service that you requested.

### **Use and disclosure of Personal Information**

Aura Group will generally only use your Personal Information in relation to the provision of financial products and services or other professional services to you. If considered appropriate we may also use your Personal Information for internal communication purposes such as sending you research and notifying you of new products and services that may be suitable in meeting your financial or other objectives, unless you have notified us that you do not wish to receive such communications.

You authorise Aura Group to disclose necessary information to related companies, affiliates and any agents or contractors who provide services to us in connection with the provision of the products or services. Aura Group will only enter these types of arrangements or disclose such information where we reasonably believe that the relevant party will only use your Personal Information for the specific purpose for which we supply it to them.

Subject to what is permitted at law, the types of third parties we may disclose your Personal Information may include:

- Service providers (external administrators and responsible entities)
- Organisations that are involved in managing or administering your finances, investments, superannuation, insurances etc, such as third party suppliers, printing and postal services, call centres;
- Associated businesses that may want to market products to you;
- Companies that provide information and infrastructure systems to us;
- Anybody who represents you, such as finance brokers, lawyers and accountants, advisers, insurers investment/super providers;
- Anyone, where you have provided us consent;
- Where we are required to do so by law, such as under the Anti-Money or Laundering and Courter Terrorism Financing Act 2006 (Cth);
- Investors, agents or advisers, or any entity that has an interest in our business; or
- Your employer, referees or identity verification services.

These disclosures may involve overseas storage and other overseas transfer, processing and use of your Personal Information, and disclosure to these third parties, including in or to countries or territories which do not offer the same level of protection of Personal Information as may be



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enjoyed within Australia. Without limiting the foregoing, your data may be disclosed by us to any associated firms and vendors which conduct operational, technology and customer service functions in Singapore, Thailand and other jurisdictions.

### **Storage of Personal Information collected**

Aura Group stores all Personal Information collected in secure computer storage facilities, paper-based files and other records, and take steps to protect your Personal Information that we hold from misuse, loss, unauthorised access, modification or disclosure.

Organisations who provide support services to us and process your Personal Information on our behalf are required to appropriately safeguard the privacy of the Personal Information provided to them.

We may be required by law to maintain records for a significant period of time. However, when we consider information is no longer required or relevant and any legal obligations that may apply to the information held have been met, we will remove details that identify you or we will securely destroy the records.

### **Direct marketing from Aura Group**

Aura Group will directly communicate to you with regards to business updates, investment updates, business offers, publicity, changes to the organisation, offers you may find of interest and to introduce and offer new products and services.

You have the option to opt out of receiving any Aura Group marketing material, which is communicated via Email across the Aura Group. The option to 'unsubscribe' from the emails will be available as a function at the bottom of the email. If you require any assistance please contact us at [admin@aura.co](mailto:admin@aura.co)

### **Updating Personal Information**

Aura Group aims to maintain up-to-date and accurate personal information. If you believe the personal information that Aura Group holds is inaccurate, incomplete or out-of-date and Aura Group agrees, the information will be amended. We will also take such steps (if any) as are reasonable in the circumstances to give notification of this correction to any third parties to whom it has been previously disclosed by Aura Group. If we are unable to accept the changes requested, we will provide you with a written response outlining the reasons for not accepting your request to alter your personal information.



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You should keep Aura Group informed of any changes to your personal information and promptly advise us of changes when they arise.

### **Access to Personal Information held by Aura Group**

Aura Group may provide you with access to the personal information held about you, upon your request. You may be required to supply a valid means of identification as a security precaution to assist us in preventing the unauthorised disclosure of your personal information.

Aura Group reserves the right to charge an appropriate fee for retrieving and supplying you with the information that you request. If a fee is chargeable we will advise you of the likely fee in advance.

Certain circumstances may restrict Aura Group from providing you with access to your personal information and we will provide you with a written response outlining the reason for denying you the access to the personal information we hold about you.

### **Aura Group Websites**

If you visit an Aura Group Website to browse, read or download information, our system will log these movements. These website logs are not personally identifiable and Aura Group makes no attempt to link them with the individuals who browse the website.

Aura Group may collect Personal Information from you when you enter our website [www.aura.co](http://www.aura.co). Cookies are used on our website to give you access to certain pages without having to log in each time you view the page. We may also use independent external service providers to track our website traffic and usage

### **Links to third party websites**

From time to time we may place links on our website to external third party websites that we consider may be of benefit to you. You should note that third party websites are not covered by our Privacy Policy. If you elect to link to the website of a third party, you may be asked to provide registration or other information. Please note that the information you are providing may be collected. You should familiarise yourself with the Privacy Policy adopted by that third party.

### **Using government identifiers:**

Aura Group does collect information in the form of government identifiers where appropriate. These can be in the form of an individual's tax files number, Australian Business Number, passport number and drivers licence number.



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### **Not identifying individuals:**

Most of the Aura Group entities require full client disclosure and access to some information which may be personal as described above. Identifying individuals is a general requirement of the law for many of the Aura Group entities and is required to conduct our general business operations. Where possible we will accept your request to remain anonymous.

### **Privacy related enquiries or complaints**

Aura Group takes the required care when dealing with your personal information. However, if you have any questions or you are dissatisfied with how we have dealt with your Personal Information or our compliance with this Privacy Policy and the Australian Privacy Principles please contact our Privacy Officer on the details below. The Privacy Officer will respond as soon as possible confirming receipt of your complaint. Your complaint will be investigated in accordance with our complaints handling policy.

Privacy Officer  
Aura Group  
Level 24, 52 Martin Place  
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Email: [admin@aura.co](mailto:admin@aura.co)

If you are not satisfied with our response to your complaint, you may refer your complaint to the Office of the Australian Information Commissioner (OAIC), [www.oaic.gov.au](http://www.oaic.gov.au).

Please note we are always monitoring and reviewing our policies in place at Aura Group, in order to keep up to date with market and legal expectations. We may be required to make amendments to this privacy policy.