

PRIVACY POLICY

VERSION 2.1

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UNITED GLOBAL CAPITAL

Throughout this brochure, **United Global Capital Pty Ltd** is referred to as '**UGC**', '**we**', '**us**', '**our**' or any such variations.

This Privacy Policy does not relate to financial services provided by firms, companies, individuals or institutions with which UGC does business, or to whom they introduce clients.

This brochure is dated **1 June 2021** and replaces all previous versions.



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+61 3 8657 7640

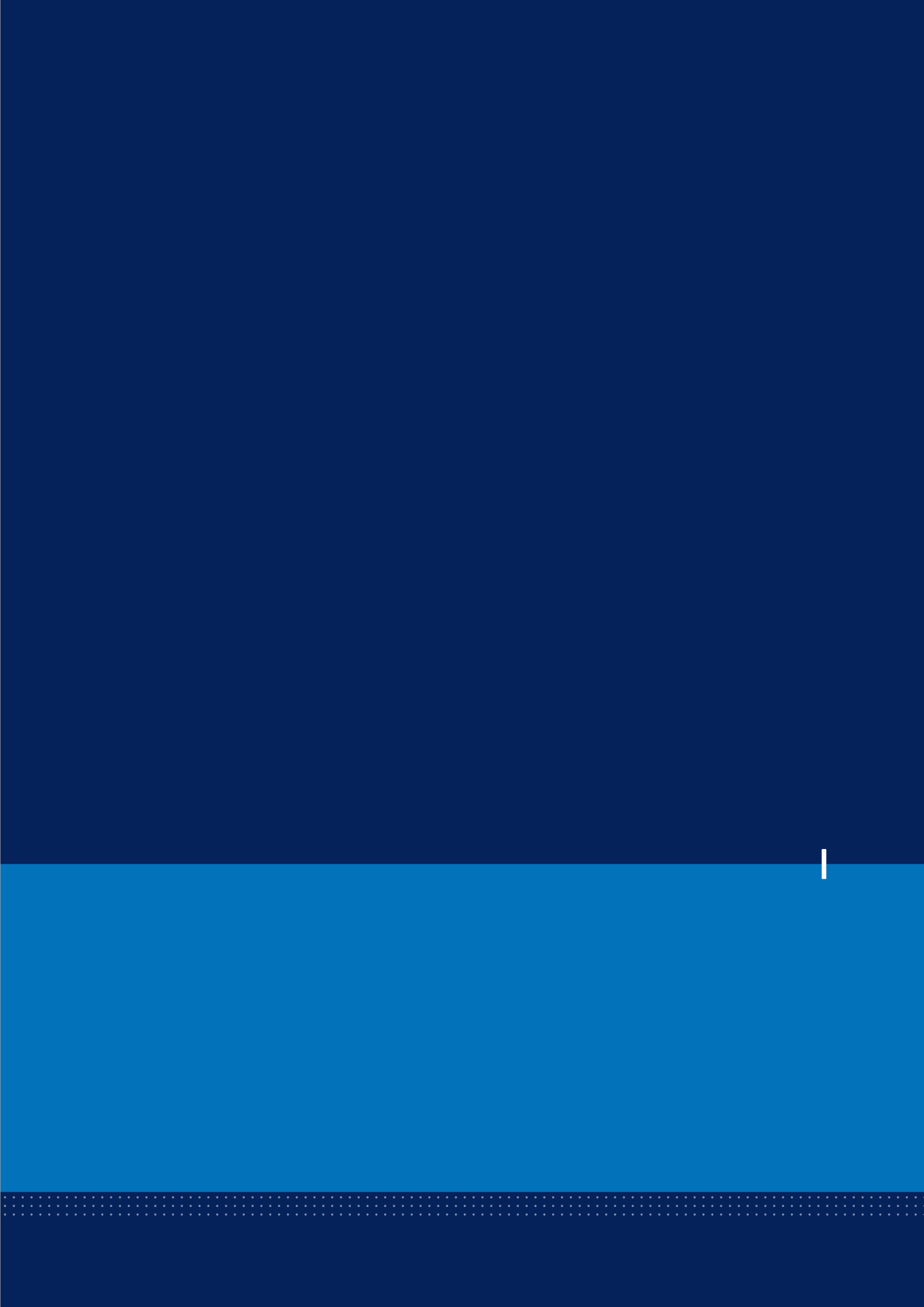


United Global Capital

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| OUR COMMITMENT TO PRIVACY

United Global Capital Pty Ltd (UGC) recognises that it is important for you to know how we deal with your personal information, and for that reason, this statement will outline our current Privacy Policy. UGC abides by the National Privacy Principles (NPPs) established under the Privacy Amendment (Private Sector) Act 2001.



COLLECTION OF INFORMATION

UGC is required under various legislation and codes of practice to collect certain information about you, in order to provide our range of services. These include, but are not limited to, the Corporations Act, Income Tax Assessment Act, and certain regulations issued by the Australian Securities and Investments Commission (ASIC). In addition, our ability to provide you with comprehensive and quality services is reliant upon us obtaining certain personal information about you. The staff and representatives of UGC may request personal and sensitive information from you. This will generally comprise, but not be limited to the following types of information:

PERSONAL DETAILS

e.g. name, address, contact details (phone, email), date of birth, marital status, dependents, employment details.

FINANCIAL DETAILS

e.g. assets, liabilities, income, expenses.

BUSINESS DETAILS

Including ABNs.

DETAILS OF ALL INVESTMENTS

superannuation, investor numbers, credit card and bank account details.

PERSONAL GOALS AND OBJECTIVES

The reasons you are seeking advice and what you aim to achieve.

TAXATION INFORMATION

Including your tax file number (TFN).

If you do not provide us with the information required, we may elect to terminate our relationship with you if we believe it will jeopardise our ability to provide you with a complete, accurate and comprehensive service. We will not collect any personal information about you except when you have knowingly provided that information to us or authorised a third party to provide that information to us.

Information will be collected from a variety of sources, including directly from you, external organisations and associated companies of United Global Capital. We only collect, maintain and use personal and sensitive information about you if it is necessary for us to adequately provide the services requested.

USE AND DISCLOSURE OF INFORMATION

Any personal information about you collected by UGC will be used for the following purposes:

- **Provision of investment services.**
- **Completion of associated documentation and application forms.**
- **Market services which may be supplied by UGC or by other suppliers that may be of interest to you, unless you inform us not to do so.**
- **Providing you with agreed services to assist in meeting your requirements, needs, goals and objectives.**

The organisations to whom we may be required to disclose information include, but are not limited to:

- **Other companies within the group.**
- **Financial institutions (including fund managers, financial advisers, stock brokers).**
- **Government departments e.g. Australian Taxation Office (ATO), ASIC and Centrelink, as required by law.**
- **External service providers and other compliance inspectors, for audit purposes.**
- **External parties for business acquisitions, or in the event of the sale of the business.**
- **Any other external party, as authorised by you from time to time.**

Furthermore, we will not use or disclose information collected about you, other than for a purpose made known to you, unless the disclosure is:

- **Required by law (e.g. ATO, Australian Prudential Regulation Authority and ASIC have the power to order us to disclose information about your situation).**
- **Is authorised by law (e.g. to protect our interests, or where we have a duty to the public to disclose), or:**
- **You have consented to our disclosing the information to you.**

UGC will not sell, rent or trade your personal information. We may use the personal information collected from you for the purpose of providing you with direct marketing material, such as articles that may be of interest to you. However, you may request not to receive such information by contacting our office as specified below.

STORAGE AND SECURITY

UGC recognises how important the privacy of your personal information is to you. Therefore, at all times, we will seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure. Your personal information is generally held in your personal file. Information may also be held in a computer database. All paper files are stored in secure areas. Computer-based information is protected through the use of access passwords. In the event you cease to be a client of this organisation, any personal information which we hold about you will be maintained in a secure on/off-site storage facility for a period of at least 7 years, in order to comply with legislative and professional requirements, after which time the information will be destroyed.

IDENTIFIERS

UGC will not adopt as our own any identifiers that you may provide to us, such as Tax File Numbers, Centrelink reference numbers, Medicare numbers etc.

TRANSFER OF INFORMATION OVERSEAS

This is required either when information is sent directly to the client, or to obtain further information from international organisations to aid services provided. Wherever possible, the information will only be transferred to another country where UGC reasonably believes the other country has privacy laws substantially similar to our own.

ACCESS YOUR INFORMATION

You may at any time request access to your personal information. We will provide you with access to that information, either by providing you with copies of the information requested for your inspection, or providing you with an accurate summary of the information held. We may, prior to providing access in accordance with this policy, require you to provide evidence of your identity.

In the event we refuse you access to your personal information, we will provide you with an explanation for that refusal. We will endeavour to respond to any request for access within 14 days, depending on the complexity of the information and/or the request, and may charge fees for the request of a significant amount of information to be copied or accessed.

QUALITY OF THE PERSONAL INFORMATION

UGC is committed to ensuring that your personal information that we hold is accurate, complete and up to date. To assist us with this, please contact us if any of the details you have provided change.

Furthermore, if you believe that the information we have about you is not accurate, complete or up to date, please contact us and we will take all reasonable steps to correct the information.

PRIVACY COMPLAINTS

If you wish to complain about any potential breach of this privacy policy or the NPPs, you should contact us, and request that your complaint be directed to the Compliance Manager as follows:

THE COMPLIANCE MANAGER

United Global Capital Pty Ltd

Level 33, 360 Collins Street, Melbourne, Victoria 3000

Phone: +61 3 8657 7640

Email: info@ugc.net.au

Your complaint will be responded to within 14 days. We endeavour to resolve any complaint to your satisfaction; however, if you are unhappy with our response, you are entitled to contact the Office of the Privacy Commissioner, who may investigate your complaint further.

ONLINE PRIVACY

UGC's website may contain links to other websites whose operator may or may not adhere to a privacy policy or be governed by the NPPs. We will not collect any information about you from our website, except where you knowingly provide it to us. The information collected will depend on how you use the facilities on the website and may include some of the personal details stated above.

For example, if you visit the website to browse or download information, our system will record the date and time of your activities, the information viewed and/or downloaded. In the event that you enter information in the process of completing an email or any other online forms, the information will be collected by UGC if you submit the details.

Our website uses cookies, which allow us to identify your browser while you are using our site. Cookies do not identify you; they simply allow us to track usage patterns so that we can measure the level of interest in various areas of our site. All browsers have a facility to notify you when you receive a cookie, and you can elect to either accept it or not. Your internet service provider should be able to assist you to set your preferences.

PRIVACY STATEMENT

UNITED GLOBAL CAPITAL

UGC is committed to complying with the Privacy Act requirements introduced in December 2001. UGC may collect information about you for the following purposes:

- **Provision of investment services.**
- **Completion of associated documentation and application forms.**
- **To market services which may be supplied by UGC or by other suppliers that may be of interest to you, unless you inform us not to do so.**
- **To provide you with agreed services to assist in meeting your requirements, needs, goals and objectives**

As UGC provides a number of service offerings, we are required under various legislative bodies and codes of practice to collect certain information about you in order to provide our range of services. These include, but are not limited to: the Corporations Act, Income Tax Assessment Act, as well as certain regulations issued by the Australian Securities and Investments Commission (ASIC).

Whilst you are not obliged to provide us with the information requested, if you decline to do so, we may be unable to provide the level of service and advice required and expected of us. In connection with the provision of services, it may be necessary for us to disclose personal information about you to other professionals and organisations such as:

- **Financial institutions (including fund managers, financial advisers, stock brokers).**
- **Government departments e.g. Australian Taxation Office, ASIC and Centrelink as required by law.**
- **External service providers and other compliance inspectors, for audit purposes.**
- **External parties for business acquisitions, or in the event of the sale of the business.**
- **Any other external party, as authorised by you from time to time.**

We will not use or disclose information collected, for purposes other than those detailed above, or related purposes, unless the law requires disclosure or we have been provided with your consent to do so. UGC recognises how important the privacy of your personal information is to you. We will therefore, at all times, seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure. UGC is committed to ensuring that the personal information we hold is accurate, complete and up to date. If you believe that the personal information we hold about you is incorrect, we request that you contact us and we will take all reasonable steps to correct this information. If at any time you wish to have access to the information we hold about you, or if you would like a copy of our detailed Privacy Policy, you are welcome to request this by contacting the Compliance Officer on (03) 8657 7640 or by email on info@ugc.net.au.

The preparation of this Privacy Policy was completed on 1 June 2021.

