



JBM PRIVACY POLICY

1. What is this Policy About?

JBM recognises the importance of ensuring that its clients have confidence in the way JBM handles personal information.

JBM is bound by, and committed to, the terms of the Privacy Act 1988 and the Australian Privacy Principles which govern the way in which JBM manages personal information. This policy sets out how JBM collects, uses, discloses and otherwise manages personal information about its clients and other third parties from whom personal information is collected.

Unless a client states otherwise, JBM may use the personal information that a client has provided, so that JBM's related entities, dealers and other business partners can promote and market products, services and special offers that may be of interest to JBM clients. In addition, this policy also applies to JBM with respect to how JBM handles the personal information of its employees and contractors.

2. What is Personal Information?

Personal information is any information about an identified individual, or an individual who is reasonably identifiable. Common examples of personal information are names, addresses, telephone numbers, dates of birth and bank account details.

- JBM will only collect information about a client that is reasonably necessary in order to adequately provide the services the client has requested.
- The use or disclosure of personal information collected by JBM is subject to approval by its Compliance Department.
- JBM may be requested by regulators to provide certain personal information about clients, and is by law obligated to provide such information.
- Clients can request to review personal information held by JBM by contacting their advisor or JBM Compliance Dept.

3. What Kinds of Personal Information does JBM Collect and Retain?

JBM only collects personal information that is necessary for one or more of its functions or activities.

JBM is subject to certain legislative and regulatory requirements which necessitate it obtaining and holding detailed and accurate information which personally identifies the clients and/or contains information or an opinion about clients ("Personal Information").

JBM will not collect any Personal Information about a client except when the information provided to JBM is authorised by a client or a third party to provide that information. Generally, collection of personal information will be obtained in either face-to-face interviews, over the telephone or by way of a Client Agreement Form. From time to time additional and/or updated personal information may be collected through one or more of those methods.

The type of information collected by JBM may include the client's name, date of birth, contact details (including address, email address and phone number), financial information and information about how the client will use the products and services being provided. This is not an exhaustive list and JBM may need to collect additional information in order to assist JBM in providing services to its clients.



In order to provide clients with a comprehensive advisory and dealing service in financial products, and to have a reasonable basis for recommendations made, JBM may request personal information to:

- determine credit worthiness;
- assist the client in gaining an understanding of a financial product;
- make financial products recommendations;
- execute financial products transactions on behalf of a client;
- clear and settle financial products transactions on a client's behalf;
- invest in financial products on behalf of a client

4. How is Personal Information Collected?

Most information we hold about clients is collected from the Client Agreement Form and through the Know Your Client (KYC) process. Information may also be collected over the phone or via the internet. Sometimes, information about an individual is collected from other people or organisations. For example, information about a director of a corporate customer may be obtained from a public record relating to the company.

Unless otherwise permitted by law, or unless it is obvious from the circumstances that you would know or expect the information to be collected, JBM will take reasonable steps to ensure that you are aware that JBM is collecting the information, the reason why the information is being collected and how the information will be used.

Regardless of how it is collected, all personal information is handled in accordance with this Privacy Policy.

5. Use and Disclosure of Personal Information

JBM uses the personal information it holds in order to provide its clients with the services they request. No company within JBM will use or disclose Personal Information collected for any purpose other than:

- (a) the purposes for which it was provided or secondary related purposes in circumstances where the client would reasonably expect such use or disclosure; or
- (b) where the client has consented to such disclosure; or
- (c) Where the Australian Privacy Principles authorise use or disclosure where required or authorised under law, in circumstances relating to public health and safety and in connection with certain operations by or on behalf of an enforcement body.

JBM is required under the Corporations Act to make certain information available for inspection, on request to ensure ongoing compliance with licensing and regulatory requirements. This may involve the disclosure of Personal Information. JBM may also collect personal information from its suppliers in order to complete business transactions and purchase products and services.

JBM may disclose the clients' Personal Information to market operators, clearers and product issuers for the purpose of giving effect to clients' instructions and the recommendations made by JBM. JBM may disclose clients' Personal Information to external contractors (service providers) for the following purposes:

- (a) execution, clearing and settlement of Financial Products transactions
- (b) registration and/or changes to shareholder detail
- (c) accounting for Financial Products transactions



- (d) causing statutory audits to be conducted as required by law
- (e) maintenance and support of JBM's information technology systems
- (f) in the course of reviews by external consultants
- (g) financial or legal advice

It is a condition of our agreement with each of JBM's external contractors that they adopt and adhere to this privacy policy. Clients can be assured that their personal information will be maintained by any contractor to whom it is disclosed in accordance with this policy. If clients have any concerns in this regard, they should contact JBM by any of the methods detailed below (refer paragraph below entitled contact details).

External service providers are only authorised to use personal information for the purpose for which we supplied it. Those organisations are not authorised to use that personal information for their own purposes.

It is important to note that some of the Group's services include Funds Management and related investment advice. Providing a client with this service includes undertaking activities such as administering the client's accounts or their investments, providing client support, responding to inquiries and requests for product information and meeting regulatory requirements.

If JBM is unable to collect personal information from or about an individual, it may not be able to do business with that individual or the organisation with which the individual is connected.

If the personal information provided to JBM is incomplete or inaccurate, JBM may be unable to provide that individual or the organisation with the services that they are seeking.

JBM may use the Personal Information collected from clients for the purpose of providing them with direct marketing material such as research that may be of interest, to inform them about new products and services or special offers from time to time. However, clients may, by contacting JBM by any of the methods detailed below, request not to receive such information and we will give effect to that request. Please allow 2 weeks for the request to be actioned. Please note that personal information will not be used for marketing purposes where the Do Not Call Register Act 2006 or the Spam Act 2003 applies or where it is contrary to any other Australian legislation or regulations.

6. Document Storage and Security

JBM will at all times seek to ensure that the Personal Information collected and held is protected from misuse, interference, loss, unauthorised access, modification or disclosure. At all times Personal Information is treated as confidential and any sensitive information is treated as highly confidential and stored securely. Sensitive information will only be collected and stored with the individual's consent and only if the information is reasonably necessary for JBM to carry out its functions or is required or authorised by law to be collected.

Access to JBM's premises is controlled by only allowing JBM employee and contractors with security passes to access the premises. Unauthorised persons are strictly prohibited from entering our premises. All electronic information is stored on password protected computers.

In the event you cease to be a client of this organisation, any Personal Information which JBM holds about you will be maintained in a secure off-site storage facility for a period of 7 years in order to comply with legislative and regulatory requirements, following which time the information will be destroyed.

7. Clients' Access to Personal Information

Clients may at any time request access to personal information.

JBM will, subject to the exceptions listed below, provide access to that information either by:



- providing copies of the information requested;
- allowing clients to inspect the information requested; or
- Providing an accurate summary of the information held.

JBM will, prior to providing access in accordance with this policy, require clients to provide evidence of identity.

JBM will **not** provide access to a client's personal information if:

- (a) providing access would pose a serious and imminent threat to the life or health of a person;
- (b) providing access would have an unreasonable impact on the privacy of others;
- (c) the request for access is frivolous or vexatious;
- (d) the information related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings;
- (e) providing access would reveal JBM's intentions in relation to negotiations with a client in such a way as to prejudice those negotiations;
- (f) providing access would reveal evaluative information generated within JBM in connection with a commercially sensitive decision-making process;
- (g) providing access would be unlawful;
- (h) denying access is required by law;
- (i) providing access would be likely to prejudice certain operations by or on behalf of an enforcement body or an enforcement body's requests that access not be provided on the grounds of national security; or
- (j) Providing access could prejudice the prevention, detection or investigation of seriously improper conduct, either within or external to JBM's operations.

In the event JBM refuses clients access to personal information, reasons will be provided.

8. Correction of Personal Information

JBM will endeavour to ensure that, at all times, the personal information about clients is up to date and accurate. In the event that clients become aware, or believe, that any personal information which JBM holds is inaccurate, incomplete or outdated, clients may contact JBM and provide evidence of the inaccuracy or incompleteness. JBM will, subject to the exceptions under section 7 above, take all reasonable steps to correct clients' personal information.

9. Website

JBM has implemented procedures and installed equipment to safeguard the security and confidentiality of personal information collected via our website. While it is not necessary to register a client's personal details to use JBM's website, JBM do offer a registration service which will enable a client to receive additional services and information. In the event that clients do register with JBM, personal information including the name and e-mail address will be collected.

JBM continually reviews these arrangements to ensure that we are doing all that is reasonably and technically feasible at the time to protect your information. Due to the nature of the Internet, JBM cannot guarantee that it is totally protected from hackers or misuse.



JBM website contains links to other Web sites whose operator may or may not adhere to a privacy policy or be governed by the Australian Privacy Principles. This privacy policy does not apply if clients access another website through a link from JBM's website. In this case the privacy policy of the owner of the other website (if any) will apply. JBM cannot and will not make any warranty or representation as to the practices of any linked websites in the handling of personal information.

If clients have registered with JBM and decide, at any time, that they do not wish to receive any further information from any company within JBM, they can send an email to the address listed below requesting to be removed from the online registration database. Please allow two weeks for the request to be actioned.

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

10. Trans-border Data Flows

JBM will not transfer data internationally unless:

(a) we believe that the recipient is governed by laws or rules that would uphold the Australian Privacy Principles similar to the privacy guidelines in the Privacy Act 1988 (Cth);

(b) we have taken reasonable steps to assure us that the information transferred will not be collected, held, used or disclosed inconsistently with the Privacy Act 1988 (Cth); and

(c) the transfer is necessary to disclose information for the purpose for which it was obtained and for any reasonable secondary purpose arising of the primary purpose.

11. Resolving Clients' Concerns about Access to Personal Information

If clients believe that the privacy of their personal information has been compromised, clients are entitled to complain. Complaints can be made by contacting JBM Privacy Officer. JBM will respond to complaints as soon as possible. It is our intention to use our best endeavours to resolve any complaint to clients' satisfaction, however, if you are unhappy with JBM's response, clients are entitled to contact the Office of the Privacy Commissioner who may investigate your complaint further.

12. Contact Details

Privacy Officer	
Address:	JB Markets Pty Ltd Level 44, Grosvenor Place 225 George Street Sydney NSW 2000
Telephone:	1300 648 165
Email:	compliance@jbmarkets.com



13. Privacy Commissioner

If an individual is not satisfied with our response to their complaint, they can complain to the Privacy Commissioner online at www.privacy.gov.au or call 1300 363 992.