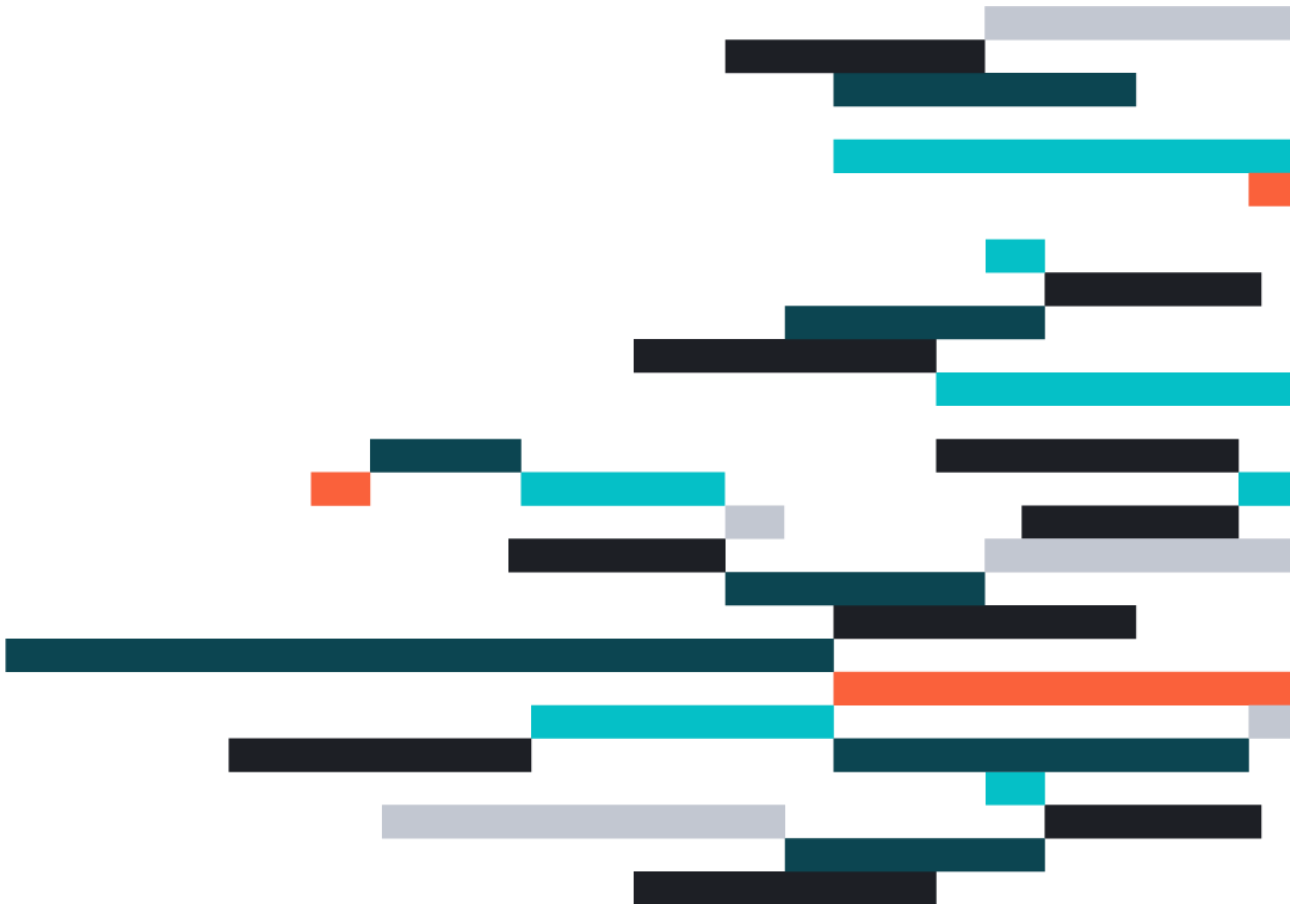


Privacy Policy

July 2023

Policy Owner	Diversa Pty Ltd
Approval Date	July 2023
Next Scheduled Review	July 2024





1. Statement of Policy

1.1 Objectives

Diversa Trustees Pty Ltd (DTL) and CCSL Ltd (CCSL) (collectively referred to as 'Diversa') operate within the highly regulated financial services sector and the observance of good governance principles and practices is imperative to success. Diversa is committed to ensuring the confidentiality and security of personal information provided to us.

This Privacy Policy deals with the collection, security, use and disclosure of personal information pursuant to the *Privacy Act 1988 (Cth)* (Privacy Act) including the Australian Privacy Principles.

1.2 Application

This Policy explains how Diversa may collect, use, share and retain information about you and the choices you have in relation to the collection and use of your personal information.

This Policy applies to all Diversa directors, employees, contractors.

1.3 Amendments

Any amendments to this Privacy Policy will be notified to you by posting an updated version to our website.

2. Collection of Personal Information

Diversa collects personal information through a variety of methods and contact points during its business. In some cases, we may also collect personal information through third parties or intermediaries.

The type of information collected may include the following:

- Name, gender and date of birth
- Contact details
- Employment details such as information relating to your remuneration, superannuation contributions and employment status



- Accounting records
- Tax File Number and taxation records
- Statements of financial position regarding assets and liabilities
- Nominated beneficiaries of a superannuation fund
- Attitudes to investment risks
- Information on your family members and partners, e.g., details of next of kin, family details; and
- Details relating to some related personal interests, e.g., charitable interests.

When you visit our website, we may use 'cookies' or similar technologies to collect data. A cookie is a small file, typically of letters and numbers, downloaded onto a device when you access a website. Our website collects the following information from users:

- your server address
- your top level domain name (e.g., .com, .gov.au, etc)
- the date and time of your visit to the site
- the pages you accessed
- the previous site you have visited; and
- the type of browser you are using.

In addition, we may have to collect certain information about you where we are required to do so by law. This includes Australian *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (AML/CTF Act), which affects financial institutions, and requires us to collect personal information to verify your identity, prior to providing certain designated services to you.

2.1 Anonymity

The Privacy Act allows you to choose to remain anonymous or use a pseudonym in your dealings with Diversa. For example, you may choose not to provide your name or contact details if enquiring about a product or service. However, this option will not be available to you where it is impractical for us to provide a service or product without verifying your identity.

We comply with our obligations under the AML/CTF Act and will act in accordance with any relevant Anti-Money Laundering and Counter-Terrorism Financing policies.



2.2 Unsolicited Information

There may be instances where Diversa comes into possession of personal information that it has not requested. If this occurs, we may be permitted to record or use this information if the information could have been collected through the ordinary course of our business. However, if the information would not have been collected through the ordinary course of our business, we will destroy or de-identify any information.

3. Management of Personal Information

Personal information that is collected may be stored electronically or in hard copy. Personal information may be held directly by us or by an administrator, or by a third party, which we have engaged to provide services.

We have implemented processes and systems to ensure personal information is protected and used only for the purposes for which it was collected. This acts to prevent the unauthorised use or disclosure of personal information to third parties by ensuring:

- Database access is controlled, and third-party agreements reflect privacy law obligations
- Internal access to client records and databases is restricted based on employees' roles and responsibilities
- Authorisation processes are in place for change in access
- Data at rest and during transit is encrypted
- Multifactor authentication is required during the login process
- Segmentation of production and non-production environments
- Web Application Firewall and threat detection technologies are utilised
- Passwords are encrypted and
- Client records in hard copy format are secured, archived and securely disposed of where appropriate.

Diversa may be required to hold personal information for a specific period in accordance with applicable legislation and regulations. In cases where we are no longer required to maintain records, personal or sensitive information, held by us will be promptly and securely destroyed or de-identified. Where records are held by a third party, we will take reasonable steps to ensure the personal information is destroyed or de-identified.



4. Use and Disclosure of Personal Information

We collect, hold and disclose your personal information for the following purposes:

- as a necessary part of providing our products and services
- to promote and market our products and services or provide members with information that we believe may be of interest (unless as directed otherwise)
- to personalise and customise your experiences with our websites
- to help us research the needs of our customers and to market our products and services with a better understanding of member needs and the needs of customers generally
- to allow us to provide advertising material regarding Diversa, our clients, and other business partners (unless as directed otherwise) and
- other purposes related to any of the above.

We will only use your information for the purposes for which it was collected (primary purposes) or a purpose related to the primary purpose, if this use would be reasonably expected by you, to comply with the law or otherwise, with your consent. Where we are provided personal information for recruitment purposes, this information may be confidentially disclosed to authorised personnel within Diversa for this purpose or disclosed to relevant contractors for this purpose.

4.1 Disclosure to Third Parties

We may disclose your information to necessary third parties, who assist us to provide, manage and administer our goods and services. Information provided to third parties will be dealt with in accordance with that entity's privacy policy. Potential third parties we may disclose your information to include:

- Outsource companies such as mailing companies and information technology companies
- Subsidiaries or affiliated companies to us (e.g., administrators and custodians)
- Auditors performing audits on Diversa or any administrators or promoters
- Appointed representatives (such as lawyers, accountants, financial advisers, power of attorney, trustees etc)
- Insurance brokers, insurers, and reinsurers



- Marketing and digital agencies, who may send to you information, advertising, or educational material on our behalf
- Our website host or software application providers.

We will only disclose your personal information to a third party if:

- You have provided consent to the disclosure or
- The disclosure is related to the purpose for which it was collected or
- It is required by law or order of an Australian court or tribunal or
- Exceptional circumstances apply, such as an imminent risk to health or of criminal activity.

Provided the disclosure is only of information relevant to the service, this will relate to the primary purpose for which the information was collected which was the provision of superannuation and Trustee management services to clients.

While all our member data is held in Australia or New Zealand, some services provided by our third-party service providers may require disclosure of personal information, outside of Australia. Overseas recipients are likely to be located in the Philippines and have read only access to member data. Third party service providers predominantly utilise Australian based IT facilities and services with a small presence in the southeast Asia region for disaster recovery and business continuity planning capabilities.

We will not disclose information to an overseas recipient unless:

- we have taken reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles
- we have obtained consent from the individual and/or
- the disclosure is required or permitted by law.

5. Client Access

This Policy is published on our website www.diversa.com.au .

When receiving a request to provide the Privacy Statement, we will do so promptly and free of charge where possible. We will endeavour to provide the Policy to you in a format that is convenient (for example, in printed form or via email).

5.1 Providing Access to Personal Information

You are entitled to have access to and seek correction of any personal information that we may hold about you. We require that requests for access to or to update or correct your personal information be in writing outlining the details of your request. Requests should be addressed to the Privacy Officer via the details provided in this Policy.

We will take appropriate steps to verify your identity (or verify that you act as an authorised agent of the individual concerned) before granting a request to access your personal information.

We will respond to your request for access to your personal information within a reasonable time after you make the request. If access is granted, it will be provided within 30 days from your request. We will provide you with access to your personal information or update or correct your personal information, unless we are lawfully excluded from granting your request, including if:

- giving access would be unlawful
- we are required or authorised by law or a court/tribunal order to deny access or
- giving access is likely to prejudice one or more enforcement related activities conducted by an enforcement body.

Where your request for access is accepted, we will provide you with access to your personal information in a manner, as requested by you, providing it is reasonable to do so.

Your request for correction will be dealt with within 30 days, or a longer period as agreed by you. If we deny your request, we will provide you with a written notice detailing reasons for the refusal and the process for making a complaint about the refusal to grant your request.

Upon accepting a request for correction of your personal information, we will take all steps that are reasonable in the circumstances, having regard to the purpose for which your information is held, to correct your personal information.

6. Complaints

6.1 Complaints Handling Process

If you believe that we have breached a term of this Policy or the Privacy Act you may submit a written complaint. The written complaint can be emailed or posted to us using the contact



details set out below. You must include contact details for us to contact you regarding your complaint.

Our Privacy Officer will consider your complaint and respond as soon as reasonably possible, but not more than 30 days from receiving the complaint.

If you are unsatisfied with the outcome of your complaint you may refer your complaint to the Office of the Australian Information Commissioner to be resolved.

7. Contact Us

If you wish to:

- gain access to your personal information
- make a complaint about a breach to your privacy
- contact us with a query about how your information is collected or used
- contact us regarding any other matter concerning this Policy,

you can speak directly with our staff who will do their best to try to resolve your issue as simply as possible. Alternatively, you can write to us or send us an email so that our Privacy Officer can consider the matter. We will respond to you as soon as reasonably possible.

If you do not wish to receive direct marketing from us, please contact our Privacy Officer via the details below. Our contact details are as follows:

Privacy Officer contact: complaints@diversa.com.au

Postal address: GPO Box 3001, Melbourne Vic 3001

For more information on privacy see the Office of the Australian Information Commissioner's website at: www.oaic.gov.au.

