

Privacy Policy and Disclosure Statement

Our Commitment

Warnaco Pty Ltd ATF the Warnaco Unit Trust trading as Warnecke & Co. recognise that your privacy is important to you - it is to us as well.

Warnecke & Co abides by the Australian Privacy Principles established under the Privacy Amendment (Enhancing Privacy Protection) Act 2012. The information set out below is largely a summary of our obligations under the Australian Privacy Principles.

Collection

As Warnecke & Co offers chartered accounting, audit, financial planning, business consulting and finance services, we are subject to certain legislative and regulatory requirements, which necessitate us obtaining and holding detailed information that personally identifies you, and/or contains information or an opinion about you ("personal information"). In addition, our ability to provide you with a comprehensive accounting, financial planning, finance and business advice service is dependent on us obtaining certain personal information about you, including:

1. details of your financial needs and objectives;
2. details of your current financial circumstances (personal and/or business), including your assets and liabilities (both actual and potential), income, expenditure, insurance cover and superannuation;
3. details of your investment preferences and aversion or tolerance to risk;
4. information about your employment history, employment circumstances, family commitments and social security eligibility; and
5. any other relevant information that you give to us for the purpose of providing you with business and/or financial recommendation.

We are required pursuant to the Corporations Act 2001, the Code of Professional Conduct of the Institute of Chartered Accountants in Australia, Rules of Professional Conduct of the Financial Planning Association of Australia and the National Consumer Credit Protection Act 2009, to collect sufficient information to ensure appropriate advice can be given in respect of recommendations made to our clients. If you elect not to provide us with the information referred to above, the appropriateness or adequacy of advice given to you may expose you to higher risks in respect of the recommendations made.

We will only collect, maintain and use personal information about you if it is necessary for us to adequately provide to you the services you have requested.

Generally, collection of your personal information will be directly from you and effected in either face to-face interviews, over the telephone or by way of an online client engagement form. From time to time additional and/or updated personal information may be collected through one or more of those methods. From time to time we may be required to gather personal information about you from a third party, i.e. Banks/Financial Institutions, Insurance Companies, Fund Managers, etc.

Warnecke & Co will only collect personal information once authorisation has been provided by you. You have a right to refuse us authorisation to collect information from a third party. This policy also applies to those circumstances.

The Privacy Amendment (Enhancing Privacy Protection) Act sets out a number of Australian Privacy Principles (APPs). Our aim is to both support and ensure that we comply with these principles. Further information on privacy in Australia may be obtained by visiting the website of the Office of the Federal Privacy Commissioner at <http://www.privacy.gov.au>.

We are also required pursuant to the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 ("AML/CTF Act"), to collect personal information to provide us with a sufficient degree of certainty regarding your identity. We will only collect, maintain and use such personal information if, and to the extent that, it is necessary, and in the context of the business activity or transaction between yourself and Warnecke & Co.

In order to provide you with advice in relation to certain types of insurance products, we may be required to collect information from you about your health and medical history. Any health information will be maintained, in accordance with this policy.

We will assume that the personal information that you provide to us is accurate, complete and up to date. In the event that any of your personal information changes, please contact us as soon as possible and we will amend our records.

Use and Disclosure

We are required, under the Code of Professional Conduct of the Institute of Chartered Accountants of Australia, the Rules of Professional Conduct of the Financial Planning Association of the Code of Practice of the Australia and Mortgage and Finance Association of Australia, to make certain information available for inspection by the Associations on request to ensure ongoing compliance with mandatory professional standards. Upon request, we may make this same information available to our external Compliance Contractor. This may involve the disclosure of your personal information. We are also obliged pursuant to the Corporations Act to maintain certain transaction records and make those records available for inspection by the Australian Securities and Investments Commission.

We are subject to record keeping obligations and reporting obligations to AUSTRAC under the AML/CTF Act. You acknowledge and agree that we may retain, supply or procure the supply of any personal information, documentation and other evidence, without notice to you, to enable us to comply with our obligations under the AML/CTF Act.

Warnecke & Cos' philosophy is based upon providing an integrated business services approach. Consequently, your personal information may be shared with any one of Warnecke & Cos' associated entities, for the purpose of providing the services detailed in the "Collection" section. We may use the personal information for the purpose of providing you with direct marketing material, such as articles that may be of interest to you. You may, by contacting us by any of the methods detailed over the page, request not to receive such information and we will give effect to that request. Please allow two weeks for your request to be actioned. We maintain a register for those individuals not wanting direct marketing material.

Within Warnecke & Co we may need to disclose your personal information to superannuation fund trustees, insurance providers, product issuers, banks/financial institutions, legal advisers etc. for the purpose of giving effect to your financial advice and the recommendations made by us. These entities may be based in another country. By providing your personal information to Warnecke & Co you consent to such disclosure where it is necessary to give effect to your financial advice and the recommendations made by us.

Your personal information may be disclosed to external contractors or temporary staff that may be hired to handle workloads during peak periods. It is a condition of our agreement with each of our external contractors that they adopt and adhere to this Privacy Policy. You can be assured that your information will be maintained, in accordance with this policy, by any contractor to whom it is disclosed. If you have any concerns in this regard please contact us.

In the event that we propose to sell our business, we may disclose your personal information to potential purchasers for the purpose of them conducting due diligence investigations. Any such disclosure will be made in confidence and it will be a condition of that disclosure that no personal information will be used or disclosed by them. In the event that a sale of our business is affected, we may transfer your personal information to the purchaser of the business. As a client you will be advised of any such transfer.

Storage and Security

We will 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. At all times your personal information is treated as confidential and any sensitive information is treated as highly confidential.

Your personal information is generally held in your client file. Information may also be held in a computer database.

Warnecke & Cos ' security measures include:

- all computer based information is protected through the use of access passwords on each computer;
- data is backed up daily and stored offsite;
- firewalls to prevent the hacking of our database;
- clauses in employment contracts requiring confidentiality;
- appropriate security access to Warnecke & Cos' premises; and
- security bins for the disposal of written information.

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 offsite storage facility for a period of five years in order to comply with legislative and professional requirements, following which time the information will be destroyed. Warnecke & Co will ensure that any documents that are destroyed are done so in a

secure manner by secure shredding or other form of destruction that may be performed by a contractor external to Warnecke & Co.

Access and Correction

You may at any time contact us to request access to your personal information. We will (subject to the following exceptions) provide you with access to that information by providing you with copies of the information requested, allowing you to inspect the information requested, or providing you with an accurate summary of the information held. We will, prior to providing access in accordance with this policy, require you to provide evidence of your identity.

We will not provide you with access to your personal information if:

1. providing access would pose a serious threat to life or health of a person;
2. providing access would have an unreasonable impact on the privacy of others;
3. the request for access is frivolous or vexatious;
4. the information related to an existing or anticipated legal proceedings between us and would not be discoverable in those proceedings;
5. providing access would reveal our intentions in relations to negotiations with you in such a way as to prejudice those negotiations;
6. providing access would be unlawful;
7. denying access is required or authorised by or under law; and
8. providing access would be likely to prejudice certain operations by or on behalf of an enforcement body or an enforcement body requests that access not be provided on the grounds of national security.

In the event we refuse you access to your personal information, we will provide you with a written explanation for that refusal.

We will endeavour to ensure that, at all times, the personal information about you that we hold is up to date and accurate. In the event that you become aware, or believe, that any personal information which we hold about you is inaccurate, incomplete or outdated, please inform us. You would need to provide evidence of the proposed corrections and we would take all reasonable steps to update the information if we agreed that the information required correction.

We will endeavor to respond to any request for access within 14 - 30 days depending on the complexity of the information and/or the request. If your request is urgent, please indicate this clearly.

You will not be charged a fee for making a request to access your personal information. However, if at the time of making the request you are no longer a client of Warnecke & Co, and Warnecke & Co incurs any costs in providing you access to your personal information (such as fees to retrieve information from off-site storage) we may pass those costs on to you at our discretion. If charges are

applicable in providing access for you, we will disclose these charges to you prior to providing you with the information, so that you have the discretion of proceeding or not.

Transborder Dataflow

Warnecke & Co takes its obligations to protect your information seriously, this includes when we operate throughout Australia and overseas. As part of our operations some uses and disclosures of your information may occur outside of your State or Territory and/or outside of Australia. In some instances we may need to obtain your consent before this occurs.

Sensitive Information

Without your consent we will not collect information about you that reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs or affiliations, membership of professional or trade association, membership of a trade union, details of health, disability, sexual orientation, or criminal record.

This is subject to some exceptions including: the collection is required by law; and when the information is necessary for the establishment, exercise or defence of a legal claim. Personal information will be treated as confidential information and sensitive information will be treated highly confidential.

Government Identifiers

Although in certain circumstances we are required to collect government identifiers such as your tax file number, Medicare number or pension card number, we do not use or disclose this information other than when required or authorised by law or unless you have voluntarily consented to disclose this information to any third party.

You can deal with us anonymously where it is lawful and practicable to do so. For example, if you telephone requesting our postal address

Complaints Resolution

If you wish to complain about any breach or potential breach of this privacy policy or the Australian Privacy Principles, you should contact us and request that your complaint be directed to the Privacy Officer. Your complaint will be considered within 7 days and responded to.

It is our intention to use our best endeavours 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.

Privacy Policy and Disclosure Statement

Our Website ww.warnecke-co.com.au contains links to other Websites whose operator may or may not adhere to a privacy policy or be governed by the Australian Privacy Principles.

While it is not necessary to register your personal details to use our Websites, we do offer a registration service that will enable you to receive product and service updates, newsletters and

other information. In the event you do register with us, we will collect personal information from you including your name and e-mail address.

If you have registered with us and decide that you do not wish to receive any further information from us, or you wish to amend or update your registration details, you can send an e-mail to the address noted below with your request. Please allow two weeks for your request to be actioned.

Our Website uses cookies which allows 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 allow you to be notified when you 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.

A copy of this policy is available on the Warnecke & Co website; www.warnecke-co.com.au
Alternatively, hard copies are available at our Hutt Street office or by contacting the Privacy Officer listed below.

Contact Us

If you seek any further information from us about this Statement or our Privacy Policy generally, please contact our Privacy Officer at one of the reference points below:

Director

209 Hutt Street Adelaide SA 5000

Telephone: (08) 8223 3272

Facsimile: (08) 8232 2138

E-mail: acc@warnecke-co.com.au

Additional Privacy Information

Further information on privacy in Australia may be obtained by visiting the web site of the Office of the Federal Privacy Commissioner at www.privacy.gov.au