



Privacy Policy

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1. Respecting your Privacy

This Policy covers JANA Investment Advisers Pty Limited ABN 97 006 717 568 (**JANA** or **we**). We respect your personal information, and this Policy explains how we collect, use and disclose it, and your rights regarding personal information held about you.

2. What personal information do we collect and hold?

2.1. General information

The types of information that we may collect and hold about you could include:

- ID information such as your name, postal or email address, telephone numbers, and date of birth;
- your employment details;
- other contact details;
- your location or activity including IP address, and whether you've accessed third party sites;
- your opinions or personal views;
- your voice and image where you participate in virtual meetings and such meetings are recorded; and
- other information we think is necessary.

Over the course of our relationship with you, we may collect and hold additional personal information about you.

2.2. Sensitive information

Sometimes we need to collect sensitive information about you. Sensitive information is information about a person's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association or trade union, sexual preferences or practices, criminal record, health information, genetic or biometric information. This could include information about your health or reasons relating to hardship. Unless required by law, we will only collect sensitive information with your consent.

2.3. When the law authorises or requires us to collect information

We may collect information about you because we are required or authorised by law to collect it. There are laws that affect financial institutions, including company and tax law, which require us to collect personal information. For example, we may require personal information to verify your identity under Commonwealth Anti-Money Laundering law.

2.4. What do we collect via your website activity?

When you use JANA websites we may collect information about your location or activity including IP address, telephone number and whether you've accessed a third party site. If you use our website(s) including social media channels, we may monitor your use of those online interactions. This is done to ensure we can verify you and you can receive information from us, to identify ways we can improve our services for you and to understand you better. Some of this website or application information is collected using "cookies".

Much of this data collection is done through the use of cookies and used to improve our services and enhance users' online experience with us (e.g. website statistics) and does not identify individual users but does identify internet browsers. Where we do identify you, JANA treats any use or disclosure of your personal information in accordance with this Policy.

2.5. Candidate Personal Information

As part of our recruitment process, we collect personal information from you and the recruitment agencies we directly engage, and where applicable from any referees you have provided to us. We may also collect sensitive information about you as part of a background checking process. With your consent, this information may be disclosed to and obtained from third party agencies that we engage to conduct probity checks on our behalf.

Unless otherwise advised by you, if your application is unsuccessful, we will keep your information on file for potential consideration for any future vacancies. If you prefer, you can request at any time, in writing, for us to destroy your personal information.

3. How do we collect your personal information?

3.1. How we collect and hold your information

There are many ways we collect information from you. We might collect your information when you fill out a form with us, when we speak over the phone or face to face, when we meet virtually via video conferencing platforms such as Microsoft Teams, via email, our websites or other electronic means. In addition, when you use our website we may collect information about your IP address, location or activity.

We will try to collect personal information directly from you unless it's unreasonable or impracticable. It is important that you keep your contact details up-to-date.

3.2. How we collect your information from other sources

Sometimes we collect information about you from other sources. We may collect information about you that is publicly available (for example from public registers or social media) or made available by third parties. For instance, we do this where:

- we can't get hold of you and need to update your contact details;
- we are provided information by third parties such as your employer or work colleagues or industry participants;
- we need information for fraud prevention purposes;
- you have consented to third parties sharing it with us;
- we are conducting reference or background checks;
- at your request, we exchange information with your legal or financial advisers or other representatives.

3.3. What if you don't want to provide us with your personal information?

If you don't provide your personal information to us, we may not be able to:

- provide you or your associate with the relevant product or service;
- recommend your company's services to our clients;
- manage or administer your/your associate's product or service;

- verify your identity or protect against fraud;
- let you know about other products or services that might better meet your financial needs; or
- assess your application as part of our recruitment process.

3.4. What do we do when we get information we didn't ask for?

Where we receive unsolicited information, we will check whether that information is reasonably necessary for our functions or activities. If it is, we'll handle this information the same way we do with other information we seek from you. If not, we'll ensure we do the right thing and destroy or de-identify it.

3.5. When will we notify you that we have received your information?

When we receive personal information from you, we'll take reasonable steps to notify you how and why we collected your information, who we may disclose it to and let you know how you can access it, seek correction of it or make a complaint.

Where we collect your personal information from third parties we will take reasonable steps to notify you of the circumstances of that collection. We recommend our customers regularly review our website to review updates to this Policy (www.jana.com.au).

3.6. How do we take care of your personal information?

We store information in different ways, including in paper and electronic form. The security of your personal information is important to us and we take reasonable steps to protect it from misuse, interference and loss, and from unauthorised access, modification or disclosure. Some of the ways we do this are:

- confidentiality requirements and privacy training of our employees;
- document storage security policies;
- security measures to control access to our systems and premises;
- only giving access to personal information to a person who is verified to be able to receive that information;
- ensuring third parties agree to comply with privacy obligations; and
- electronic security systems, such as firewalls and data encryption on our websites.

We can store personal information physically or electronically with third party data storage providers. Where we do this, we use contractual arrangements to ensure those providers take appropriate measures to protect that information and restrict the uses to which they can put that information.

3.7. What happens when we no longer need your information?

We'll only keep your information for as long as we require it for our purposes. We may also be required to keep some of your information for certain periods of time under law, such as the Corporations Act and the Anti-Money Laundering & Counter-Terrorism Financing Act for example. When we no longer require your information, we'll take such steps as are reasonable in the circumstances to destroy your information or ensure it is de-identified.

4. How we use your personal information

4.1. What are the main reasons we collect, hold and use your information?

Because we offer a range of services and products, collecting your personal information allows us to provide you or the company you represent with the products and services you or the company, or our clients, have asked for. This means we can use your information to:

- provide you or the company you represent with information about products and services, including financial advice;
- consider your (or the company you represent's) request for products and services, including eligibility;
- administer products and services which includes answering requests and complaints, varying products and services, conducting market research, taking any required legal action and managing our relevant product portfolios; and
- evaluate the services provided by the company you represent.

4.2. Can we use your information for marketing our products and services?

We may use or disclose your personal information to let you know about products and services that we believe may be of interest to you, or the company you represent. We will not do this if you tell us not to.

Such marketing activities may be via email, telephone, SMS or any other electronic means, including targeted advertising.

With your consent, we may disclose your personal information to third parties such as brokers or agents, or for the purpose of connecting you with other businesses or customers. You can ask us not to do this at any time.

You can let us know at any time if you no longer wish to receive direct marketing offers (see 'Contact Us'). We will process your request as soon as practicable. Where you have subscribed to something specific, then these subscriptions will be managed separately.

4.3. What are the other ways we use your information?

Other ways we use your personal information include:

- identifying you or verifying your authority to act on behalf of a customer;
- identifying opportunities to improve our service to you or the company you represent;
- allowing us to run our business and perform administrative and operational tasks (such as training staff, risk management, developing and marketing products and services, undertaking planning, research and statistical analysis, and systems development and testing);
- preventing or investigating any fraud or crime, or any suspected fraud or crime;
- as required by law, regulation or codes binding us; and
- for any purpose for which you have given your consent.

4.4. How do we use the information we collect about you during our recruitment process

We use your personal information collected during our recruitment process to:

- verify your identity, employment history and credentials;
- assess your eligibility and suitability for the advertised role or vacancy;

- conduct reference, background and/or probity checks, which may be through the use of third party service providers; and
- to inform you of future vacancies that we consider may be suitable or of interest to you.

5. Who do we share your personal information with?

To make sure we can meet your specific needs and for the purposes described in ‘How we use your personal information’, we sometimes need to share your personal information with others. We may share your information with other organisations for any purposes for which we use your information.

5.1. Sharing with third parties

We may disclose your personal information to third parties, including:

- JANA’s clients;
- those involved in providing, managing or administering a product or service, including for example Channel Investment Management Limited (ABN 22 163 234 240) or other custodian(s);
- referrers who refer your application or business to us;
- service providers or agencies who conduct reference, background or probity checks;
- fraud reporting agencies (including organisations that assist with fraud investigations and organisations established to identify, investigate and/or prevent any fraud, suspected fraud, crime, suspected crime, or misconduct of a serious nature);
- service providers that maintain, review and develop our business systems, procedures and technology infrastructure, including testing or upgrading our computer systems;
- organisations involved in a corporate re-organisation or transfer of JANA assets or business;
- mailing houses and telemarketing agencies and media organisations who assist us to communicate with you;
- other organisations involved in our normal business practices, including our agents and contractors, as well as our accountants, auditors or lawyers and other external advisers (e.g. consultants and any independent customer advocates);
- government or regulatory bodies (including the Australian Securities and Investment Commission and the Australian Tax Office) as required or authorised by law (in some instances these bodies may share it with relevant foreign authorities); and
- where you’ve given your consent or at your request, including to your representatives, or advisors.

5.2. Sharing outside of Australia

We store your information in the cloud or on other types of networked or electronic systems on servers located in Australia.

Some of JANA’s clients may be located outside of Australia, such as New Zealand, and we may provide your information to those overseas recipients.

6. How do you access your personal information?

6.1. How you can generally access your information

We'll always give you access to your personal information unless there are certain legal reasons why we can't. You can ask us to access your personal information that we hold by contacting us – see 'Contact Us'. We may charge you a small fee to cover our costs when giving you access, but we'll always check with you first. If we can't give you access, we will tell you why in writing. If you have concerns, you can complain. See 'How do you make a complaint?'.

7. How do you correct your personal information?

You can contact us if you think there is something wrong with the information we hold about you. If you are worried that we have given incorrect information to others, you can ask us to tell them about the correction. We'll try and help where we can - if we can't, then we'll let you know in writing. See 'Contact Us'.

8. How do you make a complaint?

If you have a complaint about how we handle your personal information, we want to hear from you. You are always welcome to contact us. We are committed to resolving your complaint and doing the right thing by our customers and employees. We aim to acknowledge your complaint as soon as practicable within 7 days after it is made, and to investigate and resolve it in a timely and appropriate way within 30 days (unless you have agreed to a longer period in writing). See 'Contact Us'.

If you still feel your issue hasn't been resolved to your satisfaction, then you can escalate your privacy concern. See 'Contact details for escalating complaints'.

9. Contact details for escalating complaints

Need more help?

Office of the Australian Information Commissioner

- Online: www.oaic.gov.au/privacy
- Phone: 1300 363 992
- Email: enquiries@oaic.gov.au

10. Contact us

We care about what you think. Please contact us if you have any questions or comments about our privacy policy and procedures. We welcome your feedback.

You can contact us by:

- calling us on 02 9221 4066
- emailing us at privacy@jana.com.au
- writing to us at Level 9, 255 George St, Sydney, NSW, 2000.

Changes to this Privacy Policy

This Policy may change from time to time. Please visit our website regularly. If you would like a copy of this Policy, please contact us.

For more information about privacy in general, you can visit the Office of the Australian Information Commissioner's website oaic.gov.au.