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# Privacy policy

Netccentric Limited

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Netccentric Limited (**Netccentric**) appreciates the importance of respecting an individual's right to privacy.

In handling your personal information, Netccentric is required to comply with the Singapore Personal Data Protection Act 2012 (No. 26 of 2012) (**Act**) and other relevant laws.

This privacy policy sets out how Netccentric aims to protect the privacy of your personal information, your rights in relation to your personal information managed by Netccentric and the way Netccentric collects, uses and discloses your personal information.

This policy may be updated by the Board from time to time.

# Privacy policy

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## 1 Collection of personal information by Netccentric

Personal information is information that identifies an individual or from which an individual's identity can reasonably be ascertained.

Generally, the kinds of personal information that Netccentric will collect and hold will include your name, date of birth, address, telephone number, e-mail address, IP address, driver's licence details, passport details, tax file number, bank account and credit and/or debit card details as well as any other information that may be required under Australian anti-money laundering legislation for identification and other purposes. In some circumstances, Netccentric may also hold other kinds of personal information.

Generally, Netccentric will collect your personal information directly from you such as by requesting that you provide your personal information when you fill out an application form or other similar document or when you submit information to Netccentric (such as via Netccentric's website).

There may be other occasions when Netccentric collects your personal information from sources other than you, such as from a publicly maintained record or from an information services provider.

## 2 Use and disclosure of personal Information

Netccentric will collect, use and disclose your personal information for the following purposes:

- (a) to provide services to you;
- (b) to respond to queries you submit to Netccentric;
- (c) to provide you with information about Netccentric's products or services that may be of interest to you;
- (d) to process any investment application submitted by you or on your behalf;
- (e) to administer any investment you have with Netccentric, including communicating with you about your investment;
- (f) to make deposits of any relevant distributions or dividends to your nominated bank account;
- (g) to conduct Netccentric's accounting, billing and other internal administrative functions; or
- (h) to comply with Netccentric's legal requirements under any applicable laws, including any anti-money laundering legislation and any other legal requirements which Netccentric is subject to.

The types of organisations to which Netccentric may disclose your personal information include:

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- (a) your financial advisers or other professional advisers;
  - (b) any third party service provider which Netccentric may engage, for example to provide custody, administration, technology, auditing, mailing, printing or other services;
  - (c) government authorities; and
  - (d) Netccentric's professional advisers (including legal and accounting firms, auditors, consultants and other advisers).

You are under no obligation to provide your personal information to Netccentric. However, without receiving certain personal information from you, Netccentric may not be able to provide services to you or accept, process or manage your application for investment.

Your personal information will not be retained longer than necessary, but may be retained as required under the law or where legal actions have arisen or are contemplated.

Further, Netccentric may disclose your personal information to overseas recipients from time to time (for example, data hosting or other service providers located overseas).

### **3 Security of your personal information**

Netccentric will take reasonable steps to ensure that your personal information that Netccentric holds is protected against misuse, loss, unauthorised access, modification or disclosure.

### **4 Accessing personal information**

Under the Act, you have a right to access your personal information that is collected and held by Netccentric. If at any time you would like to access or correct the personal information Netccentric holds about you, or you would like more information on Netccentric's approach to privacy, please let Netccentric know by contacting Netccentric's Privacy Compliance Officer.

To obtain access to your personal information, Netccentric may request that you provide us with proof of your identity. This is necessary to ensure that personal information is provided only to the correct individuals and that the privacy of others is protected.

Netccentric will respond to requests for access or correction within a reasonable time period and will take all reasonable steps to provide access to your personal information or correct the personal information within 30 days from your request.

If providing you with such access requires retrieval of your personal information or other cost to Netccentric, a fee may be charged for Netccentric's cost of such retrieval and supply of information.

### **5 How to contact us**

For further information or enquiries regarding your personal information, please contact Netccentric's Privacy Compliance Officer.

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## 6 Privacy complaints

Please direct all privacy complaints (including complaints that Netccentric has breached the Act) to Netccentric's Privacy Compliance Officer. At all times, privacy complaints:

- (a) will be treated seriously;
- (a) will be dealt with promptly;
- (b) will be dealt with in a confidential manner; and
- (c) will not effect your existing obligations or effect the commercial arrangements between you and Netccentric.

The Privacy Compliance Officer will commence an investigation into your complaint. You will be informed of the outcome of your complaint following the completion of the investigation.