

PRIVACY POLICY

1. **SLS Advisory** is committed to providing quality services to you and this policy outlines our ongoing obligations to you in respect of how we manage your Personal Information.

SLS Advisory cares about your privacy:

We will never rent, trade or sell your email address to anyone.

We will never publicly display your email address or other personal details that identify you.

2. SLS Advisory is bound by the Privacy Act 1988 (Cth) (the Privacy Act), including the Australian Privacy Principles (APPs) and any relevant privacy code registered under the Privacy Act. The APPS are 13 key principles in relation to the collection and treatment of Personal Information, which are laid down in the Privacy Act.
3. A copy of the APPs may be obtained from the website of The Office of the Federal Privacy Commissioner at www.privacy.gov.au.

WHAT IS PERSONAL INFORMATION AND WHY DO WE COLLECT IT?

4. Personal Information is information or an opinion that identifies an individual. Examples of Personal Information we collect include:
 - names;
 - dates of birth;
 - addresses;
 - email addresses;
 - phone and facsimile numbers;
 - bank account and/or credit card details for agreed billing purposes; and
 - any information provided during the process of creation of an account for you.
5. This Personal Information is obtained in many ways including meetings, **correspondence, by telephone and facsimile, by email, via our website www.slsadvisory.com.au, from your website, from media and publications, from other publicly available sources** and from third parties. We don't guarantee website links or policy of authorised third parties.
6. We collect your Personal Information for the primary purpose of providing our services to you, providing information to our clients and marketing. We may also

use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure. You may unsubscribe from our mailing/marketing lists at any time by contacting us in writing.

7. We may collect Personal Information that you provide to us about yourself when you:
 - use our website;
 - complete an online contact form to contact us;
 - create a user account using our website;
 - purchase any services through our website;
 - provide information to us by telephone or through a marketing initiative; or
 - send us an email or other communication.
8. When we collect Personal Information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.
9. Our website may also collect Internet Protocol (IP) addresses. IP addresses are assigned to computers on the internet to uniquely identify them within the global network. We collect and manage IP addresses as part of the service of providing internet session management and for security purposes. We may also collect and use web log, computer and connection information for security purposes and to help prevent and detect any misuse of, or fraudulent activities involving, this site.

SENSITIVE INFORMATION

10. Our policy is that we do not collect sensitive information about our clients or prospective clients. If any of our clients or prospective clients elects to provide us with any sensitive personal information, we will take all reasonable steps to ensure that the sensitive information is securely protected.

THIRD PARTIES

11. Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

COOKIES

12. Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and

also allows us to improve our site. A cookie is a text file or a packet of information that is placed on your hard disk by a web page server to identify and interact more effectively with your computer. There are two types of cookies that may be used at our website: a persistent cookie and a session cookie. A persistent cookie is entered by your web browser into the "Cookies" folder on your computer and remains in that folder after you close your browser, and may be used by your browser on subsequent visits to this site. A session cookie is held temporarily in your computer's memory and disappears after you close your browser or shut down your computer. Cookies cannot be used to run programs. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you. In some cases, cookies may collect and store Personal Information about you. We extend the same privacy protection to your Personal Information, whether gathered via cookies or from other sources.

13. You can choose to accept or decline cookies. You can also configure your internet browser to accept all cookies, reject all cookies or notify you when a cookie is sent. Please refer to your internet browser's instructions to learn more about these functions. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website (for example, if you choose to decline cookies, you may not be able to fully experience the interactive features of this site).

14. Our website uses cookies in order to:

- remember your preferences for using our website;
- facilitate e-commerce transactions via our website, to ensure that your details are remembered when navigating between pages on our website; and
- remember details of data that you choose to submit to us (e.g., through online contact forms or by way of comments, forum posts, chat room messages, reviews, ratings, etc).

HOW WE MAY USE YOUR PERSONAL INFORMATION

15. Your Personal Information may be used in order to:

- verify your identity;
- process any purchases of services that you may make through our website, including charging, billing and collecting debts;
- respond to any queries or feedback that you may have;
- prevent and detect any misuse of, or fraudulent activities involving, our website;

- conduct research and development in respect of our services;
- maintain and develop our business systems and infrastructure, including testing and upgrading of these systems;
- marketing our products and services to you; and
- for any other purpose reasonably considered necessary or desirable by us in relation to the operation of our business.

DISCLOSURE OF PERSONAL INFORMATION

16. Your Personal Information may be disclosed in a number of circumstances including the following:

- Third parties such as referral partners or other contracted service providers where you consent to the use or disclosure. These third parties may be located overseas (e.g. Europe or Asia); and
- Where required or authorised by law.

17. Third parties to whom we disclose your Personal Information may use it for the following purposes:

- market research;
- billing functions; and
- website usage analysis.

18. We may also disclose your personal information to the following people/organisations:

- professional advisers (including legal advisers);
- credit reporting and fraud-checking agencies; and
- organisations who manage our business strategies.

SECURITY OF PERSONAL INFORMATION

19. Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification or disclosure. In our business, personal information may be stored both electronically (on our computer systems and with our website hosting provider) and in hard-copy form. Firewalls, anti-virus software and email filters, as well as passwords, protect all of our electronic information. Likewise, we take all reasonable measures to ensure the security of hard-copy information. We engage the services of other providers to assist in the physical and electronic storage of this information. Details of these providers are available on written request.

20. When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of 7 years.

ACCESS TO YOUR PERSONAL INFORMATION

21. You may access the Personal Information we hold about you and to update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us in writing. We will handle requests for access to your personal information in accordance with the APPs.

22. **SLS Advisory** will not charge any fee for your access request, but may charge an administrative fee for providing a copy of your Personal Information.

23. If you wish to make a request to access your Personal Information, please contact our Office Manager at admin@slsadvisory.com.au.

24. In order to protect your Personal Information we may require identification from you before releasing the requested information.

25. In some cases, we may refuse to give you access to personal information that we hold about you. This may include circumstances where giving you access would:

- be unlawful (e.g., where a record that contains personal information about you is subject to a claim for legal professional privilege by one of our contractual counterparties);
- have an unreasonable impact on another person's privacy; or
- prejudice an investigation of unlawful activity.

We may also refuse access where the personal information relates to existing or anticipated legal proceedings, and the information would not be accessible by the process of discovery in those proceedings.

If we refuse to give you access, we will provide you with reasons for our refusal.

RE-MARKETING

26. We may use the Google and/or Facebook re-marketing services to advertise on third party websites to previous visitors to this site based upon their activity on this site. This allows us to tailor our marketing to better suit your needs and to only display advertisements that are relevant to you. Such advertising may be displayed on a Google search results page or inside Facebook. Google and Facebook may use cookies and/or pixel tags to achieve this. Any data so collected by Google and/or Facebook will be used in accordance with their own respective

privacy policies. None of your personal Google and/or Facebook information is reported to us.

GDPR

27. We welcome the General Data Protection Regulation (“GDPR”) of the European Union (“EU”) as an important step forward in streamlining data protection globally. Although we do not operate an establishment within the EU and do not target any offering of services towards clients in the EU specifically, we intend to comply with the data handling regime laid out in the GDPR in respect of any personal information of data subjects in the EU that we may obtain.

28. The requirements of the GDPR are broadly similar to those set out in the Privacy Act and include the following rights:

- you are entitled to request details of the information that we hold about you and how we process it. For EU residents, we will provide this information for no fee; and
- you may also have a right to:
 - have that information rectified or deleted; or
 - stop unauthorised transfers of your personal information to a third party.

MAINTAINING THE QUALITY OF YOUR PERSONAL INFORMATION

29. It is an important to us that your Personal Information is up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up-to-date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

POLICY UPDATES

30. This Policy may change from time to time and is available on our website.

PRIVACY POLICY COMPLAINTS AND ENQUIRIES

31. If you have any queries or complaints about our Privacy Policy please contact us at:

SLS Advisory

Ground Floor, 35 Ventnor Ave, West Perth WA 6005

PO Box 688, West Perth WA 6872

admin@slsadvisory.com.au

P: 08 9322 1689

F: 08 9322 7554