



Privacy Policy

PrimaryMarket Limited ABN 24 136 368 244 (referred to as **PrimaryMarkets, we, us** or **our**) has implemented this Privacy Policy to provide users of our website <http://www.primarymarkets.com> (**Website**) and our other services with information about how we collect, hold and use Personal Information you provide to us. If you wish to make any inquiries regarding this Privacy Policy, you should contact our Privacy Officer in any of the ways specified in paragraph 10.

From time to time, PrimaryMarkets may be related to other entities (**Related Entities**) and a reference in this Privacy Policy to PrimaryMarkets, we, us or our also refers to our Related Entities.

By using our web site, you consent to the collection and use of your personal information by PrimaryMarkets as explained below. In addition to the Privacy Policy, our Terms and Conditions of Use and our respective Member Agreements shall apply to you and everyone else who uses this Website.

We may, from time to time, review and update this Privacy Policy, including taking into account new laws, regulations, practices and technology. All Personal Information held by us will be governed by our then most recent Privacy Policy as published on our Website at: <http://www.primarymarkets.com>

1. What Personal Information do we collect?

1.1 "**Personal Information**" is information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual or an individual who is reasonably identifiable.

1.2 Personal Information collected may include (but is not limited to) the following:

- (a) Registration data (such as your corporate name, personal name, business and postal address);
- (b) Information request data and response data;
- (c) Australian Business Number or ACN;
- (d) Contact details including email address and telephone numbers (landline and mobile);
- (e) For potential job applicants - occupation and employment details, resume, gender and age/date of birth; and
- (f) Information from your Buyer/Wholesale Investor identification, Intermediary Identification and/or Excluded Investor form;

2. When and why we collect Personal Information

2.1 We collect your Personal Information to allow us to conduct our business functions, to market our products and services and for the specified purposes set out in paragraph 4.1.

2.2 We may collect your Personal Information in the course of providing you with services, or when you:

- (a) Visit our Website (see paragraph 3);
- (b) Apply for membership and register for or use an account on our Website;
- (c) Request information about us, the Assets displayed on the Website (as defined in the relevant Website Terms and Conditions of Use) or our services;
- (d) Provide feedback;
- (e) Fill in a form on our Website;
- (f) In the course of providing you with services; and
- (g) Contact us by telephone, fax, email, post or in person.

- 2.3 Where we engage with you multiple times over a short period in relation to the same matter, we may not provide you with a separate notice about privacy each time we engage with you.

3. Information collected via our Website

Cookies

- 3.1 Like many websites, our Website may use 'cookies' from time to time. Cookies are small text files that are transferred to a user's computer hard drive by a website for the purpose of storing information about a user's identity, browser type or website visiting patterns. Cookies may be used on our Website to monitor web traffic, for example, the time of visit, pages visited and some system information about the type of computer being used. We use this information to enhance the content and services offered on our Website.
- 3.2 Cookies are sometimes also used to collect information about what pages you visit and the type of software you are using. If you access our Website or click-through an email we send you, a cookie may be downloaded onto your computer's hard drive.
- 3.3 Cookies may also be used for other purposes on our Website but in each case none of the information collected can be used to personally identify you.
- 3.4 You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.
- 3.5 If you disable the use of cookies on your web browser or remove or reject specific cookies from our Website or linked sites then you may not be able to gain access to all of the content and facilities in those websites.

Third party content

- 3.6 Some of the content on our Website includes applications made available by third parties such as social media buttons or links that allow you to share content or links to our Website through the relevant third party platforms. These third party applications themselves may facilitate collection of information by those third parties; through your interaction with the applications and sometimes even if you do not interact directly with them. We are not responsible for the technical operation of these applications or the collection and use practices of the relevant third parties. Please visit the relevant third party websites to understand their privacy practices and options they may make available to you in relation to their collection of your Personal Information.

4. How we use your Personal Information

- 4.1 We use the Personal Information we collect about you for our business functions and activities, which may include the following:
- (a) To administer our relationship with you including responding to your queries;
 - (b) To confirm your identity in order to create your member account and ensure that you are eligible to use the services provided on the Website;
 - (c) To conduct required Anti-Money Laundering and Counter Terrorism and Financing Australian legislation regime checks on you in connection with your use of the Website;
 - (d) To review any marketing or other information that you may make via the Website;
 - (e) To confirm that you are eligible to register an account through the Website including in accordance with relevant legislation;
 - (f) To provide services through the Website including allowing you to contact other members and account holders using the information on the Website;

- (g) To monitor, improve and administer the Website and the services provided on the Website;
- (h) To enable us to create a user profile to better serve you;
- (i) To enable us to conduct surveys and aggregate user profiles;
- (j) To ensure security of the Website and your user profile;
- (k) To train our staff and provide quality assurance;
- (l) To process any job application submitted by you;
- (m) To provide you with information on selected Asset listings and services that we think may be of interest to you (unless you have asked us not to do so);
- (n) To enable us to comply with all our legal and regulatory obligations;
- (o) To share your Personal Information with our Related Entities, business partners and our selected third parties;
- (p) To contact you to ensure customer satisfaction in respect of our role as a website provider and assist you in getting the best value from our service; and
- (q) If you are an employee or other representative of a client to which we provide our services or a supplier or service provider to us, to communicate with you about your or your employer's engagement with us and otherwise as specified in this Privacy Policy.

4.2 We reserve the right at all times to monitor, review, retain, and/or disclose any information as necessary to satisfy any applicable law, but we have no obligation to monitor the use of the Website or to retain the content of any user session.

4.3 In the event that we intend to enter into a major corporate transaction, such as a sale of control of our or another business, we may disclose certain of your Personal Information to potential buyers, underwriters or advisors. If we do this, we will take reasonable precautions to ensure that the recipients of your Personal Information are obligated to keep it confidential.

4.4 We may, from time to time, expand, reduce or sell our business and this may involve the transfer of certain sections or the whole business to other parties. Your Personal Information will, where it is relevant to any such transaction, be transferred to the new owner or newly controlling party who will, under the terms of this Privacy Policy, be permitted to use your Personal Information for the purposes for which it was supplied by you.

4.5 You consent to us using your Personal Information in the above ways.

4.6 If you do not consent to us using your Personal Information in the above ways you must not provide your Personal Information to us. You should also not provide your Personal Information to us if you are under 18 years of age. If you choose not to provide your Personal Information to us for the purposes set out in this Privacy Policy, we may not be able to provide you with requested products or services and access to some of the functionality of the Website.

4.7 We may collect and use your Personal Information for other purposes not listed above. If we do so, we will make it known to you at the time we collect or use your Personal Information.

4.8 We do not otherwise collect, use or disclose your Personal Information without your permission, unless the collection, use or disclosure is:

- (a) In accordance with this Privacy Policy or any agreement you enter into with us; or
- (b) Required or authorised by law, including without limitation the Australian Privacy Principles under the *Privacy Act 1988 (Cth)*.

4.9 Access to certain content on our Website may be allowed under a written agreement between you or your employer and PrimaryMarkets and will require a username and/or password. In some cases, failure to provide personal information may prevent you from accessing certain PrimaryMarkets web site(s) containing certain confidential information, assets, services, or promotional offers. By accessing and using our protected and secured Website(s), you agree to maintain the confidentiality

of the username and password you selected to access such site(s) and consent to both our [Terms and Conditions of Use](#) and [Member Agreement](#).

5. To whom we disclose your Personal Information

- 5.1 PrimaryMarkets may disclose, or provide access to, your personal information to third parties including other Website Members in connection with the purposes described in this Privacy Policy. Depending on the nature of your engagement with us, we may disclose your Personal Information to our Related Entities, to third parties that provide products and services to us or through us, or to other third parties.
- 5.2 We may also disclose your Personal Information to our Website host or software application providers in certain limited circumstances, for example when our Website experiences a technical problem or to ensure that it operates in an effective and secure manner.

6. Overseas disclosures

- 6.1 Some of your Personal Information may be transferred, stored, processed or used overseas by us or by third party service providers. This may happen if our Related Entities are overseas, if we outsource certain activities overseas or if transactions, information, services or products have an overseas connection. You consent to the collection, use, storage, and processing of your Personal Information outside of Australia.
- 6.2 In particular, your Personal Information may be disclosed to service providers which may store your Personal Information in the New Zealand, Hong Kong, Singapore, China, USA, UK and such other countries in which those parties or their, or our, computer systems may be located from time to time, where it may be used for the purposes described in this Privacy Policy, without us being responsible under the *Privacy Act 1988 (Cth)* for such use (or for any breach). In these circumstances, you consent to the collection, use, storage and processing of your Personal Information in those countries. Where such parties are located overseas, you may have rights to enforce such parties' compliance with applicable data protection laws, but you may not have recourse against those parties under the Australian Privacy Act in relation to how those parties treat your personal information.

7. Marketing

- 7.1 You consent to us using your Personal Information for sending you information, including promotional material, about us or our products and services, as well as the products and services of our related entities and third parties, now and in the future. You also consent to us sending you such information by means of direct mail, email, SMS and MMS messages.
- 7.2 If you do not want to receive marketing information from us, you can do so in any of the following ways:
- (a) Following the instructions in any direct marketing email that you have received from us;
 - (b) Logging into your account on the Website and editing your email preferences; or
 - (c) Contacting us using the contact details specified in paragraph 10.
- 7.3 If you provide your consent to receiving direct marketing from our third party business partners, we will provide them with your Personal Information to enable them to send information and advertising material to you. You can opt out of receiving this material from third parties by using the contact details specified in paragraph 10 if you do not want to receive marketing information from us.

8. Accessing and updating your Personal Information

- 8.1 You are entitled to access Personal Information that we hold about you. If you request access to your Personal Information, in ordinary circumstances we will give you full access to your Personal Information. However, there may be some legal or administrative reasons to deny access. If we refuse your request to access your Personal Information, we will provide you with reasons for the refusal where required by law.
- 8.2 You can access and correct some of your Personal Information through the Website by logging into your account and updating or editing your profile at any time. Alternatively, a request for access can be made by contacting us in any of the ways specified in paragraph 10.
- 8.3 We take all reasonable steps to ensure that any Personal Information we collect and use is accurate, complete and up-to-date. To assist us in this, you need to provide true, accurate, current and complete information about yourself as requested and properly update the information provided to us to keep it true, accurate, current and complete. Please contact us in any of the ways specified in paragraph 10 if you believe that the Personal Information is inaccurate or incomplete and we will use all reasonable efforts to correct the information.

9. Storage and security of Personal Information held by us

- 9.1 We aim to keep your Personal Information secure. Any Personal Information that is collected via our Website or which is held on our computer systems is protected by safeguards including physical, technical (firewalls, use of encryption etc) and procedural methods.
- 9.2 If we find that we have no further need for your Personal Information we may remove it from our systems and destroy all record of it.

10. What to do if you have a question, problem or complaint about our use of your Personal Information or this Privacy Policy

- 10.1 If you:
- (a) Have a query or concern about this Privacy Policy or our Personal Information handling processes;
 - (b) Wish to make a complaint in relation to a breach by us of your privacy;
 - (c) Would like to access your Personal Information held by us;
 - (d) Would like to opt out of direct marketing; or
 - (e) Would like to correct your Personal Information held by us,

Please contact our Privacy Officer in any of the following ways:

- By phone on +61 (0)2 9993 4475; or
- By email at info@primarymarkets.com

- 10.2 We will investigate your queries and complaints within a reasonable period of time of receiving the complaint and will notify you of the outcome of our investigation.

11. General

- 11.1 If you have questions regarding our Privacy Statement, please contact PrimaryMarkets via our [Contact Us](#) page.

Last Updated: February 2016