

We recognise the importance of protecting your personal and sensitive information collected and used by us. We follow privacy practices and procedures to maintain your privacy and protect your personal information.

This statement outlines Sequoia Asset Management (ABN: 70 135 907 550) & Sequoia Superannuation's (92 140 669 692) policy on how we manage the personal information we hold about our customers and other people.

It is Sequoia Asset Management & Sequoia Superannuation policy to respect the confidentiality of information and the privacy of individuals. We are committed to protecting and maintaining the privacy, accuracy, and security of your personal and financial information in accordance with the requirements of the National Privacy Principles of The Privacy Act 1988. We collect information about you for the purpose of reporting to AUSTRAC under the Anti Money Laundering and Counter-Terrorism Financing Act 2006.

In general, we will not use or disclose such personal information collected about you otherwise than for the purposes set out in this policy, for a purpose you would reasonably expect, a purpose required or permitted by law, or a purpose otherwise disclosed to, or authorised by you.

We may, in connection with particular services we offer or provide to you, make other privacy disclosures to you or seek your authority to use your personal information in ways which are different from or more specific than those stated in this Privacy Policy. In the event of any inconsistency between the provisions of this privacy policy and those additional materials, the provisions of the additional materials will prevail.

We have developed our Privacy Policy to address any concerns that clients may have and to inform you about the types of personal information collected, how it is stored, who has access to it, and how it is used and disclosed. This Privacy Policy is intended to provide a summary of our current approach to handling personal information.

Sequoia Asset Management & Sequoia Superannuation's Privacy Policy Statement will be reviewed from time to time to take account of new laws and technology, changes to our operations and practices and to make sure it remains appropriate to the changing environment. Any information we hold will be governed by the most current Sequoia Asset Management & Sequoia Superannuation Privacy Policy Statement.

Collection of Personal Information

As a financial service and Self Managed Superannuation (SMSF) administration organisation we can provide a range of financial services, SMSF establishment services and SMSF administration services. We collect personal information that we believe is necessary to deliver our services or products or otherwise for our primary business functions and/ or activities. Ordinarily we only collect information about you when you provide it to us or it is provided to us with your authority.

We only collect personal information by lawful and fair means and not in an unreasonably intrusive way.

Why does Sequoia Asset Management & Sequoia Superannuation collect personal information?

Our business is to understand and meet our customer's investment & SMSF needs. To do this effectively, we need to collect certain personal information. We provide a number of financial products and services under Sequoia Asset Management & SMSF services under Sequoia Superannuation and by working with business partners. They include (but are not limited to):

- investment products to build wealth
- superannuation and retirement income products to provide for retirement
- banking and other services to provide deposit and credit facilities
- insurance Providers for insurance needs
- management of investment assets such as shares, property, fixed interest and cash

We collect personal information from you in order to provide a service or to maintain our relationship with you. The purpose for which we would generally collect and use your personal information will include, but not limited to:

- complying with legislative and regulatory requirements;
- performing our administrative operations including accounting, risk management and record keeping;
- conduction market or customer satisfaction research;
- Inviting you to other events that may interest you;
- Developing and identifying products and services that may interest you; and
- (unless you ask us not to) telling you about other products and services we offer.

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 unless you have voluntarily consented to disclose this information to a third party.

What kind of personal information do we ask for?

Because of the nature of the products and services provided, government regulations and taxation laws, we ask for a range of personal information from our customers and shareholders.

The type of personal information we may collect can include (but is not limited to) name, address, date of birth, contact details, income, assets and liabilities, account balances, tax and financial statements and employment details. We obtain most of the information directly from our customers through our application process or other forms, and from maintaining records of information provided in the course of ongoing management of our clients Self Managed Superannuation Funds and investment affairs.

We may also obtain information from other sources. We may ask for other information voluntarily from time to time (for example, through market research, surveys or special offers) to enable us to improve our service or consider the wider needs of our customers or potential customers. If you choose not to provide the information we need to fulfil your request for a specific product or service, we may not be able to provide you with the requested product or service.

How do we use this information and who may we disclose it to?

While we may send you marketing material from time to time that we think will be useful to you, we are conscious of the need to respect your privacy. Unless you are informed otherwise, the personal information we hold is used for establishing and managing your financial products or services, enhancing customer service and product options and giving you ongoing information or opportunities that we believe may be relevant to you.

Generally, we require that other organisations who handle or obtain personal information as service providers to Sequoia Asset Management & Sequoia Superannuation acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with the National Privacy Principles and this policy.

Sensitive information is subject to greater restrictions

Some personal information we hold is 'sensitive'. Sensitive information relates to a person's racial or ethnic origin, membership of political bodies, religions or trade unions, sexual preferences or activities, criminal record, state of health and medical history.

The way we use tax file numbers and information received from a credit reporting agency about an individual is also restricted by law. Sensitive information is usually needed for applications for death, sickness and disability insurance and to manage claims on those products. It may also be relevant to credit and other applications. It is Sequoia Asset Management & Sequoia Superannuation policy that sensitive information will be used and disclosed only for the purposes for which it was provided, unless the customer agrees otherwise or the use or disclosure of this information is allowed by law. Documents asking for sensitive information will explain this.

Management of personal information

Sequoia Asset Management & Sequoia Superannuation trains its employees who handle personal information to respect the confidentiality of customer information and the privacy of individuals. Sequoia Asset Management & Sequoia Superannuation regards breaches of your privacy very seriously and will impose appropriate penalties, including dismissal.

Sequoia Asset Management & Sequoia Superannuation has appointed Privacy Officers to ensure that Sequoia Asset Management & Sequoia Superannuation's management of personal information is in accordance with this statement and the Privacy Act.

How do we store personal information?

Safeguarding the privacy of your information is important to us, whether you interact with us personally, by phone, mail, over the internet or other electronic medium. We hold personal information in a combination of secure computer storage facilities and paper-based files and other records, and take steps to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure. We may need to maintain records for a significant period of time. However, when we consider information is no longer needed, we will remove any details that will identify you or we will securely destroy the records.

How do we keep personal information accurate and up-to-date?

Sequoia Asset Management & Sequoia Superannuation endeavours to ensure that the personal information it holds is accurate and up-to-date. We realise that this information changes frequently with changes of address and other personal circumstances. We can generally update your customer information over the telephone or via the Sequoia Asset Management & Sequoia Superannuation website.

Can you access your personal information held by us?

Under the Commonwealth Privacy Act, you have the right to obtain a copy of any personal information which Sequoia Asset Management & Sequoia Superannuation holds about you and to advise Sequoia Asset Management & Sequoia Superannuation of any perceived inaccuracy. The Act does set out some exceptions to this. To make a request, you will need to complete an application form verifying your identity and specifying what information you require.

We will acknowledge your request within 14 days and respond promptly to it. We may charge a fee to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, we will advise the likely cost in advance and can help to refine your request if required.

Internet Security & Email

This statement outlines some privacy issues specific to the Sequoia Asset Management & Sequoia Superannuation website & email use.

Internet Security

Sequoia Asset Management & Sequoia Superannuation respects your privacy and we have taken the reasonable steps to protect our website and are committed to providing a safe and secure online environment. To that end, we maintain physical, electronic and procedural safeguards to protect information, which comply with all applicable laws. However, no data transmission over the internet can be guaranteed as fully secure and we cannot guarantee or warrant the security of any information you send to us over the internet. You submit information over the internet at your own risk. We will review our security procedures and practices from time to time.

Sequoia Asset Management & Sequoia Superannuation may collect personal information about you through your use of certain sections of Sequoia Asset Management and Sequoia Superannuation websites. We consider this information to be private; it is only collected for our internal purposes. Any information we collect may be used to help us improve the website by tailoring it to better suit your needs and to provide quicker and more effective access to the various components of the website. Also if you email us with a suggestion, comment or query we will use your information to respond to you.

We may disclose your information to other persons for these purposes or for related purposes, including information technology companies who assist us in constructing, designing and maintaining the website whether locally or overseas. We require these independent contractors and other third parties who with us to adhere to strict privacy standards through their contacts with us.

Email

By communicating with us via email, you authorise us to act on any instructions or apparent instructions without enquiring as to the identity of the sender. If your instructions are ambiguous, incomplete or unclear we are under no obligation to act on such instructions. We will not be liable for any cost, expenses, loss or damage which you may suffer or incur in connection with any action taken or omitted by us in following any email instructions from you. You are responsible for and must take all responsibility to ensure that the information you supply to us is accurate.

When we correspond with you by email, our messages are not encrypted and may potentially be accessed by unauthorised persons or organisations.

Spam Policy/Spam Act

Spam is a generic term used to describe electronic 'junk mail' - unwanted messages sent to a person's email account or mobile phone. In Australia, spam is defined as 'unsolicited commercial electronic messages'. 'Electronic messaging' covers emails, instant messaging, SMS and other mobile phone messaging, but not cover normal voice to-voice communication by telephone.

Sequoia Asset Management and Sequoia Superannuation comply with the provisions of the Spam Act when sending commercial electronic messages. Equally importantly, we make sure that our practices are in accordance with the National Privacy Principles in all activities where they deal with personal information. Personal information includes our clients contact details.

Internal Procedure for dealing with complaints

The three key steps Sequoia Asset Management and Sequoia Superannuation Follows:

Consent – Only commercial electronic messages are sent with the addressee's consent – either express or inferred consent.

Identify – Electronic messages will include clear and accurate information about the person and Sequoia Asset Management and Sequoia Superannuation is responsible for sending the commercial electronic message.

Unsubscribe – We ensure that a functional unsubscribe facility is included in all our commercial electronic messages and deal with unsubscribe requests promptly.

Consented to such communications

Commercial messages will only be sent to you when you have given consent. This may be express consent – a direct indication that it is okay to send the message, or messages of that nature or inferred consent based on our business or other relationship with you and your conduct.

Comply with the law regarding viral messages

Sequoia Asset Management and Sequoia Superannuation ensures that Commercial Communications that include a Forwarding Facility contain a clear recommendation that the Recipient should only forward the Commercial Communication to persons with whom they have a relationship, where that relationship means that person could be said to have Consented to receiving Commercial Communications.

Interactive tools

The Sequoia Asset Management & Sequoia Superannuation website provides you with many interactive tools designed to help you make an informed choice with certain financial and other decisions. Sequoia Asset Management & Sequoia Superannuation may collect personal information you enter when using the interactive tools on our website.

Cookies – What is a Cookie and how does Sequoia Asset Management & Sequoia Superannuation use cookies?

A Cookie is a packet of information that allows the server to identify and interact more effectively with your computer or mobile device, by providing you with a unique identification number. This identification number is either sent or confirmed each time you use our website. The purpose of this information is to provide you with a more relevant and effective experience on Sequoia Asset Management & Sequoia Superannuation website, including presenting web pages according to your needs or preferences. Our website may use cookies to enhance your experience when you visit.

Sequoia Asset Management & Sequoia Superannuation may also use independent external service providers to track the traffic and usage on the web site. Cookies are frequently used on many websites on the internet and you can choose if and how a cookie will be accepted by changing your preferences and options in your browser. You may not be able to access some parts of Sequoia Asset Management & Sequoia Superannuation website if you choose to disable the cookie acceptance in your browser. We therefore recommend you enable cookie acceptance to benefit from all the services on the website.

Technology improvements

Sequoia Asset Management & Sequoia Superannuation is constantly striving to improve functionality on this site through technology changes. This may mean a change to the way in which personal information is collected or used. The impact of any technology changes which may affect your privacy will be notified in this Supplement at the time of the change.

Links to third party websites

The Sequoia Asset Management & Sequoia Superannuation website has links to external third party websites that may benefit the user. External websites should contain their own privacy statements and we recommend you review them when using their websites.

Please note, however, that third party websites are not covered by Sequoia Asset Management & Sequoia Superannuation's privacy policy and these sites are not subject to Sequoia Asset Management & Sequoia Superannuation's privacy standards and procedures.

What if you have a complaint?

If you consider that any action of Sequoia Asset Management & Sequoia Superannuation breaches this Privacy Policy Statement or the National Privacy Principles or otherwise doesn't respect your privacy, you can make a complaint. This will be acted upon promptly.

To make a complaint, please telephone Sequoia Asset Management on 1300 522 644 or Sequoia Superannuation on 02 81142290 or alternatively please put in writing.

If you are not satisfied with our response to your complaint, you can telephone the Commonwealth Privacy Commissioner's hotline on 1300 363 992.

How to contact us?

If you want to make a general enquiry about Sequoia Asset Management & Sequoia Superannuation 's privacy policy, change your personal information or obtain an application form for access to your personal information phone Sequoia Asset Management on 1300 522 644 or Sequoia Superannuation on 02 81142290 or email admin@sequoia.com.au.

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