



## Privacy Policy

HFA Holdings is committed to protecting the privacy of individuals' personal information.

This Privacy Policy sets out the principals that HFA Holdings will follow in collecting, using, holding, disclosing and otherwise managing personal information.

30 August 2017

This Privacy Policy applies to information collected by HFA Holdings Limited (ABN 47 101 585 737) (**HFA**). It outlines how we manage your personal information and safeguard your privacy.

We respect the confidentiality of your information and take your privacy seriously, abiding by the Australian Privacy Principles (**APPs**) contained in the *Privacy Act 1988* (Cth).

## The information HFA collects and holds

HFA is an ASX listed company which owns an investment management business:

- Lighthouse Investment Partners, LLC (**Lighthouse**) which operates predominantly in the United States to offer investment management products and services. Lighthouse complies with privacy requirements applicable to the jurisdictions in which it operates.

In this Privacy Policy, personal information is any information that could identify you or be used to establish your identity.

HFA mainly collects, holds, uses and discloses shareholders' personal information so we can establish, manage and administer the share register, update our records and disseminate topical information about the Company. HFA has appointed Link Market Services to operate its share register, and Link Market Services may collect, hold, use and disclose your personal information on our behalf. Link Market Services also has its own Privacy Policy which can be viewed at <https://www.linkmarketservices.com.au/corporate/Privacy.html>

In addition, some laws require us to collect personal information. These include the *Anti-Money Laundering and Counter-Terrorism Financing Act, 2006* (Cth), the *Corporations Act, 2001*(Cth) and the *US Foreign Account Tax Compliance Act*.

## Will my personal information be used for Direct Marketing?

HFA does not use your personal information for direct marketing.

Lighthouse may use personal information they collect separately in relation to their investment products to keep their investors informed about their range of investment products.

## What happens if I do not provide information that has been requested?

It's your choice whether to provide your information to HFA, however, if you don't, we may be unable to fulfil our responsibilities in relation to maintaining our share register and regulatory reporting obligations.

## What types of personal information does HFA collect?

We may ask for a range of personal information to enable us to issue and administer your shareholding in the Company. The information we may request includes (but is not limited to):

- Name;
- Address;
- Date of birth;
- Contact details;
- Bank account details; and
- Tax file numbers.

Without this detail we may not be able to administer your shareholding for you.

We interact with other individuals such as suppliers, advisers and other external stakeholders in order to conduct our business and activities. In the course of these interactions we may collect contact information for these individuals.

## Does HFA collect sensitive information?

HFA does not require sensitive information about individuals to conduct its business and activities. As such, we do not collect sensitive information about you.

## How does HFA collect personal information?

HFA, or its appointed share registrar, Link Market Services, will collect your personal information either through the intermediaries you have used when transacting in HFA shares (such as your broker) or directly from you through the online or paper forms that you complete.

We may also collect personal information from public sources of information (such as internet searches).

## Is HFA likely to disclose personal information to overseas recipients?

HFA and its share registrar will generally not send personal information overseas.

However, Link Market Services is part of a multinational conglomerate and deals with some overseas third parties. In rare circumstances and under strict control, Link Market Services may authorise access to personal information by restricted persons in an overseas location. Such countries might include, but are not limited to New Zealand, the United Kingdom, France, Germany, the United States of America, Papua New Guinea, China [Hong Kong], India, South Africa and Canada. Link Market Services takes reasonable steps to confirm that third parties with whom they deal are also compliant with the APPs.

## How does HFA update personal information?

We realise that your personal information is likely to change. People move house, change jobs and update other personal circumstances on an ongoing basis. In most cases you can alter your details by contacting Link Market Services. Contact details are available on their website at <https://www.linkmarketservices.com.au/corporate/ContactUs.html>. To protect your privacy, we strongly urge you not to provide any personal information that is not required or that is not asked for.

If we believe the information we hold is incomplete or out of date, we may also seek to correct or complete our records by gathering data from other sources such as public records.

## How long will HFA keep your information?

We may be legally required to maintain some of your records for a significant period of time, however, once we believe the information is no longer required we may remove any identifying details or destroy the records entirely. Alternatively, where that is not practicable, we will take reasonable steps to protect information from misuse or unauthorised disclosure by putting the information beyond reasonable use.

## How can you contact HFA about Privacy?

If you have any questions or if you would like to give us feedback or make a complaint about how we handle your information, contact us by phone on +61 2 8302 333, by email to [contact@hfaholdings.com.au](mailto:contact@hfaholdings.com.au) or by mail to, the Company Secretary, PO Box 58, Toowong, QLD, 4066.

Alternatively, you may wish to refer to the Office of the Australian Information Commissioner (OAIC) for detailed information about the APPs.

HFA may make changes to the Privacy Statement from time to time, without notice to any person or third party.

## How do I find out about the personal information HFA holds about me?

Under the Privacy Act you have the right to access the personal information we hold about you, with some exceptions. To make a request you need to submit the request in writing.

HFA is permitted to refuse access to personal information in certain situations. Examples include where:

- Giving access would have an unreasonable impact on the privacy of other individuals;
- Giving access would be unlawful, or where denying access is required or authorised by an Australian law, court or tribunal;
- Both of the following apply
  - We have reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to our functions or activities has been, is being or may be engaged in; and
  - Giving access would be likely to prejudice the taking of appropriate action in relation to the matter
- Giving access is likely to interfere with law enforcement activities.

Before providing the requested information we will give you an estimate of any potential costs associated with this, including expenses for locating, retrieving, reviewing and copying any of the material you need.

## What about privacy and the internet?

This statement outlines some privacy issues specific to the HFA website:

### What is a Cookie and how does HFA use cookies?

Cookies are small pieces of text stored on your computer to help us determine the type of browser and settings you are using, where you have been on the website, when you return to the website, where you came from and to ensure your information is secure. The purpose of this information is to provide you with a more relevant and effective experience on the HFA website, including presenting the web pages according to your needs or preferences.

We use cookies to give you access to certain pages of the website without having to log in each time you visit. HFA may also use external service providers to track the traffic and usage on the website.

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 hfaholdings.com.au if you choose to disable cookie acceptance in your browser.

### Links to third party websites

HFA may have 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 this policy and these websites are not subject to HFA's privacy standards and procedures.

### Website Analytics

Website analytics measurement software is used to assist in tracking traffic patterns to and from the HFA website, anonymously surveying users of the site. The system is used to collect such information as the number of unique visitors, how long these visitors spend on the website when they do visit, and common entry and exit points into and from the website.

This non-personal information is collected and aggregated by third party software and provided to us in our analysis of our website. You cannot be identified personally from this information and no personal information is stored about you.

Please contact HFA on **+61 7 3218 6200** or by email to [contact@hfaholdings.com.au](mailto:contact@hfaholdings.com.au) if you would like further information on the Company.