



## Information Security Policy

Capital Australis prepares financial advice documents for the needs of financial advisers in Australia.

The management of the company issues this policy in order to protect client financial and account information, other confidential information of clients, employees and other stakeholders, as well as to enable the continuous availability of assets for secure and efficient operation.

### Customer Care

In order to confirm the trust of our clients, the services we provide are undertaken in a way which includes the safeguarding of data and confidentiality of information.

### Protecting information assets

This policy provides the framework for setting objectives of information security, protection of information assets and ensuring the continuity of critical business operations.

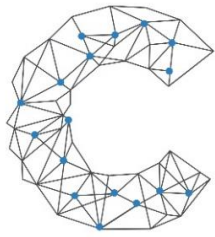
To ensure confidentiality, integrity and availability of information in accordance with the requirements of ISO 27001:2013 the Information Security Team of Capital Australis conducts a risk assessment and continuous review of risks related to information security.

Employees and business partners are expected to use information assets for legitimate business purposes, with protection and preservation of confidentiality, integrity and availability of the assets for secure business operations.

We maintain an effective system of information security through the objectives of information security, which include: a secure information environment; the implementation of security guidelines; review of security risks; testing of security solutions; the implementation of control measures to reduce security risks and enable business continuity; analysis of security incidents; use of reliable IT solutions and raising employee awareness regarding the protection of data and confidential information.

### Compliance

Capital Australis conducts its business activities with integrity and compliance with applicable laws and regulations relating to the operation of the company, and in particular with regards to the protection of trade secrets, copyright and licensing rights, and the protection of personal data.



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## Privacy Policy

### How we handle your personal information

#### 1. Privacy is important to us

Any information collected by Capital Australis that is not generally available information (e.g. available on the internet) is treated as confidential information

#### 2. Information we collect

##### Information we collect

We collect information from financial advisers regarding their business, strategies and products they recommend. We also collect personal information about individuals who are clients of financial advisers. All such information is not passed on to any third parties and is used exclusively for the purpose of the work performed by Capital Australis.

##### Sensitive information

The Privacy Act also protects sensitive information, such as health information that's collected in a fact find. We may maintain sensitive information and incorporated in the financial plans we prepare as required to present an accurate picture of a client's current position.

#### 3. How do we use your information?

We collect, use and exchange your information so that we can:

- prepare accurate and appropriate financial plans
- develop appropriate strategies.

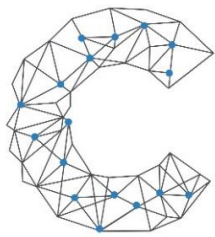
##### Gathering data for research purposes

We collect and use information to get a more integrated view of customers and provide better services. Capital Australis may combine information it has with information available from a wide variety of external sources. Capital Australis is able to analyse the data in order to gain useful insights which can be used for any of the purposes mentioned earlier.

#### 4. Keeping your information secure

We keep hard-copy or electronic records on our premises and systems or offsite using trusted third parties. Our security safeguards include:

- Staff education – We train and remind our staff of their obligations with regard to your information).
- Taking precautions with third parties – When we use third parties that handle or store data, we ensure that appropriate data handling and security arrangements are in place.
- System security – We have firewalls, intrusion detection systems and virus scanning tools to protect against unauthorised persons and viruses accessing our systems.
- Destroying data when no longer required – Where practical, we keep information only for as long as required.



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## 5. Making a privacy complaint

### How do I make a complaint?

If you have a concern about your privacy, you have the right to make a complaint.

If you feel your complaint has not been satisfactorily addressed in the first instance, or that it is taking too long to resolve, you can ask for your concerns to be escalated to the Capital Australis Privacy Officer. Contact details are as follows:

By email: [privacy.officer@capitalaustralis.com](mailto:privacy.officer@capitalaustralis.com)  
In writing: Capital Australis – Privacy Officer  
Bulevar Arsenija Carnojevica 54a/2  
11070 Novi Beograd  
SERBIA