



## **JMP HOLDINGS PRIVACY POLICY**

### **1 Your rights in relation to privacy**

This Privacy Policy applies to any personal information collected about you by JMP Holdings Pty. Ltd. (ACN 084 101 388) (**we, us, our**).

We understand the importance of protecting the privacy of an individual's personal information. This Privacy Policy sets out how we aim to protect the privacy of your personal information, your rights in relation to your personal information managed by us and the way we collect, use and disclose your personal information.

In handling your personal information, we will comply with the *Privacy Act 1988* (Cth) (**Privacy Act**) and with the thirteen Australian Privacy Principles in the Privacy Act, as well as this Privacy Policy. This Privacy Policy may be updated from time to time.

By visiting our website or providing information to us, either online or otherwise, you consent to the practices prescribed in this Privacy Policy. This Privacy Policy covers any visitor to our website or any person who applies for credit with us.

### **2 What kinds of personal information do we collect?**

Personal information is information or an opinion about an identified, or reasonably identifiable, individual. During the provision of our services, including if you access our websites, we may collect your personal information.

We generally collect three kinds of information:

- (a) personal information provided by you, including your name, address, telephone number, email address and name and credit card details;
- (b) information that we obtain about you in the course of your interaction with our websites including your internet protocol (IP) address, the date and time of your visit to our websites, the pages you have accessed, the links on which you have clicked and the type of browser that you were using, which may be linked to your personal information; and
- (c) aggregated statistical data which is information relating to your use of our websites and our services, such as traffic flow and demographics.

### **3 How do we collect personal information?**

Generally, we collect personal information directly from you, if you:

- set up or update an account or other registration on our websites;
- acquire products or services from us;
- use our websites; or
- submit an enquiry to us via our websites.

There may be other occasions when we collect your personal information from other sources, such as from an information services provider or publicly maintained records.

We may also collect statistical information if you access and use our websites by utilising features and technologies of your internet browser, including cookies and pixel tags. If you have provided personal information to us, we may link this statistical information to your personal information for the purpose of providing services to you.

#### **4 Why do we need your personal information?**

We collect your personal information for the purposes of providing you with products or services through your interaction with us directly or through our websites.

We may use your personal information:

- to provide you with more relevant advertising or promotional messages including such messages tailored to your interests;
- to respond to an enquiry you submit to us from time to time;
- to identify and inform you of other products or services that may be of interest to you;
- to fulfil any of our legal requirements;
- to improve our products and services through analysing aggregated data reports; and
- for other purposes permitted or referred to under any terms and conditions you enter into or otherwise agree to with respect to the use of our websites, our products and our services.

You are under no obligation to provide your personal information to us. However, without certain information from you, we may not be able to provide our products or services to you.

#### **5 Who do we disclose your personal information to?**

We may disclose your personal information with your consent to third parties for the purposes specified in paragraph 7 or for any other purposes specified above in paragraph 4. That means, generally, we will only disclose your personal information for a purpose related to the provision of our products or services to you. This may include disclosing your personal information to third parties who may assist us in providing these products and services, including without limitation couriers and other providers we may use to deliver our products to you. This disclosure is always on a confidential basis.

We may also disclose your personal information with your consent or if disclosure is required or authorised by law.

#### **6 Overseas disclosure**

We may disclose personal information to overseas recipients for the following purposes:

- in order to provide our services and/or products;
- for administrative or other business management purposes; or
- where you have provided your consent to us disclosing your personal information to a specified third party that is located overseas.

Where you have consented to us disclosing your personal information to a third party that is located overseas, we will endeavour to notify you of the country or countries to which your personal information will be disclosed at the time you provide your consent.

Before disclosing any personal information to an overseas recipient, we will take steps reasonable in the circumstances to ensure the overseas recipient complies with the Australia Privacy Principles or is bound by a substantially similar privacy scheme unless you consent to the overseas disclosure or it is otherwise required or permitted by law.

## **7 Direct marketing**

From time to time, we may seek your consent to us disclosing your contact details to a specified third party. When you have provided your consent, we may disclose your personal information to that third party for the purpose of the third party contacting you for promotional purposes, and the third party may contact you with special offers via the communication channel or channels specified at the time of obtaining your consent.

In the event that you do not wish to receive relevant advertising or promotional communications either from us or a third party, you can opt-out by contacting us via the contact details set out in paragraph 10 below or through an opt-out mechanism contained in a communication.

If you opt-out, your personal information will not be used for advertising or promotional communications and you will not have your data provided to any third parties for marketing or other purposes (except to the extent required by law to disclose it). You may opt to receive those communications again at any point by contacting us via the contact details set out in paragraph 10 below.

## **8 Security of your personal information**

We take all steps reasonable in all the circumstances to ensure that the personal information we hold is protected from misuse, interference and loss from unauthorised access, modification or disclosure. We hold personal information in both hard copy and electronic forms in secure databases on secure premises, accessible only by authorised staff.

We will destroy or de-identify personal information in circumstances where it is no longer required, unless we are otherwise required or authorised by law to retain the information.

## **9 Can you access and correct the personal information that we hold about you?**

We take steps reasonable in the circumstances to ensure personal information we hold is accurate, up-to-date, complete, relevant and not misleading. Under the Privacy Act, you have a right to request access and/or seek correction of your personal information that is collected and held by us.

If at any time you would like to request access to or corrections of the personal information that we hold about you, or you would like more information on our approach to privacy, please contact us via the contact details set out in paragraph 10 below. We will grant access to the extent required or authorised by the Privacy Act or other law and take steps reasonable in the circumstances to correct personal information where necessary and appropriate.

To obtain access to your personal information:

- you will have to provide proof of identity. This is necessary to ensure that personal information is provided only to the correct individuals and that the privacy of others is protected;

- you must be reasonably specific about the information you require; and
- we may charge you a reasonable administration fee, which reflects the cost to us, for providing access in accordance with your request.

If we refuse your request to access or correct your personal information, we will provide you with written reasons for the refusal and details of complaint mechanisms. We will also take steps reasonable in the circumstance to endeavour to provide you with access in a manner that meets your needs and our needs.

We will endeavour to respond to your request to access or correct your personal information within 7 days from your request.

## **10 How to contact us**

For further information or enquiries regarding your personal information held by us, or if you would like to opt-out of receiving any promotional communications from us or our partners, please contact our privacy officer on email at: [privacy@jmpholdings.com.au](mailto:privacy@jmpholdings.com.au)

## **11 Privacy complaints**

If you believe that we have breached the Privacy Act, the Australian Privacy Principles or any binding code under the Privacy Act, you can make a privacy complaint to us.

Please direct all privacy complaints to us on the contact details specified in paragraph 10. At all times, privacy complaints:

- will be treated seriously;
- will be dealt with promptly;
- will be dealt with in a confidential manner; and
- will not affect your existing obligations or affect your commercial arrangements with us.

We will commence an investigation into your complaint. You will be informed of the outcome of your complaint following completion of the investigation. In the event that you are dissatisfied with the outcome of your complaint, you may refer the complaint to the Office of the Australian Information Commissioner.