

## 1. BACKGROUND

Grove Research & Advisory Pty Limited (ABN 93 052 348 026) ("Grove") is an institutional research and advisory business. Grove provides investment advice pursuant to its Australian Financial Services Licence from the Australian Securities and Investments Commission, AFSL Number 243361.

Grove's contact details are as follows:

Address: Level 3  
23-25 O'Connell Street  
Sydney NSW 2000

Mail: Level 3  
23-25 O'Connell Street  
Sydney NSW 2000

Telephone: (02) 8246 8800  
Facsimile: (02) 8246 8899  
Email: [enquiries@groveadvisory.com.au](mailto:enquiries@groveadvisory.com.au)  
Website: [www.groveadvisory.com.au](http://www.groveadvisory.com.au)  
Privacy Officer: Anna Uremovic

## 2. PRIVACY COMPLIANCE

Grove is bound by the Privacy Act 1988 and the National Privacy Principles and deals with personal information in accordance with such principles. This Privacy Statement has been established in accordance with National Privacy Principle 5.1.

The National Privacy Principles can be obtained through the website of the office of the Federal Privacy Commissioner ([http:// www.privacy.gov.au](http://www.privacy.gov.au))

## 3. INFORMATION COLLECTED BY GROVE

The following table sets out examples of how personal information is obtained by Grove and how it is to be used:

Personal Information	What It is Used For ?
From <i>clients</i> , information such as name, address (postal and street), telephone number (switch and direct), facsimile number, email address, account details, auditor information, TFN number, GST information and confidential business and investment information.	<ul style="list-style-type: none"> <li>• Day to day business communications with clients;</li> <li>• Registration of clients with Grove Portfolio Online and providing client details to the custodian and service administrator associated with Grove Portfolio Online;</li> <li>• Providing investment advice and research materials to clients;</li> </ul>

Personal Information	What It is Used For ?
In relation to <i>clients who are organisations</i> , firms, public authorities or body corporates, this also includes the ABN number and information in relation to directors, principals and staff.	<ul style="list-style-type: none"> <li>• Arranging meetings and conferences/functions;</li> <li>• Maintaining account records;</li> <li>• Providing to, where applicable, other transaction parties and intermediaries involved in client's investments administered or managed through Grove.</li> </ul>
From <i>prospective clients</i> and the general community, information such as names, contact details and email addresses from persons who contact Grove with request for information or feedback.	<ul style="list-style-type: none"> <li>• To respond to the request made; and</li> <li>• To provide Grove marketing information.</li> </ul>
From <i>other third parties</i> such as contractors who provide services to Grove, contact details, email addresses, account information, TFN number and GST information.	<ul style="list-style-type: none"> <li>• To communicate and correspond with, and make payments to, such service providers; and</li> <li>• To enable the third party to provide services to or on behalf of Grove.</li> </ul>

## 4. HOW DOES GROVE HANDLE PERSONAL INFORMATION?

### ***Use and Disclosure of Information***

We may use personal information collected from you for the purpose of providing you with direct marketing material and information. However, if you wish to cease receiving any such information, you may let us know either by email or by mail and your request will be actioned within 2 weeks.

Personal information may be discussed with external contractors but only to enable us to provide services to you. Such contractors will be required to adopt and adhere to the policies stated in this Privacy Statement, in respect of the personal information which is obtained.

Consistent with National Privacy Principle 2, Grove will only use or disclose personal information about an individual for a purpose other than the primary purpose of collection (ie a secondary purpose) if:

- The secondary purpose is related to the primary purpose of collection;
- You would reasonably expect us to use or disclose the information for the secondary purpose;
- You have consented to the use or disclosure;
- The use or disclosure is permitted or required under the law, for example, where it is disclosed to government or regulatory bodies for purposes related to protection of public revenue or the prevention or detection of unlawful activities;
- We reasonably believe on health or public safety grounds that the information should be used for another purpose;
- It is otherwise permitted under the National Privacy Principles.

### ***Manner of Collection***

Grove receives personal information from clients and other third parties through direct communications with such persons in the normal course of business. Grove may collect personal information about individuals from third parties but will only do so in accordance with the National Privacy Principles.

### ***Information Collected On Visiting Our Website***

The organisation that hosts Grove's website (WebCentral) operates statistics gathering software to collect information about the number of visitors coming to the site. This software collects no identifying information. The software records the IP address of the visitor only, not their actual identity. We use this information to determine which areas of our web site are most popular.

### **Information Collected If You Are A Client Using Grove Portfolio Online**

If you are a client of Grove Portfolio Online, a record is kept of each time you access Grove Portfolio Online (using your secured access code and password) and Grove has access to records of each of your transactions, your investment portfolio and your applicable fees.

### ***Data Quality***

Consistent with National Privacy Principle 3, Grove is committed to ensuring that personal information collected by Grove remains accurate, complete and up to date. In pursuit of this goal, Grove will from time to time request clients and information providers to update relevant personal details.

### ***Storage And Data Protection***

Personal information is contained both in hard copy and electronic format within the offices of Grove. Personal information stored electronically is maintained in a secure environment.

Within Grove, these records of personal information are only accessible to personnel of Grove who require access to enable them to perform their duties and provide services. All personnel are bound by confidentiality obligations under their employment agreements and are required to sign a declaration of compliance binding them to comply with Grove's Privacy Statement and Policy and the National Privacy Principles.

Personal information provided on Grove Portfolio Online application forms or investment application forms is given to the administrator and custodian of Grove Portfolio Online (both currently Macquarie Bank subsidiaries) and relevant fund managers (as applicable). This information is provided solely for the purpose of your investments and is held by these third parties in accordance with their respective privacy policies. The privacy policy of the custodian and administrator of Grove Portfolio Online can be found on the Macquarie Bank website. The privacy policy of each fund manager is either found on its website or set out in the relevant offer document.

### ***Destruction of Records***

Grove will destroy records relating to personal information when such information is no longer necessary to be retained by Grove as part of its records. Personal information will be destroyed by shredding or other secure process.

### ***Openness***

Consistent with National Privacy Principle 5.2, Grove will upon request, inform a person generally about what information it holds concerning that person and for what purpose such information is held. With respect to gaining access to or correction of records, please see under "Access to Records" below.

### **Access to Records**

Individuals may access personal information by completing the Grove Request for Information Form (which is available from the Grove Privacy Officer, currently Anna Uremovic) and forwarding the form to the Privacy Officer. Any requests in relation to personal information held by Grove should be made in writing to the Grove Privacy Officer at the address referred to in this statement above. No reasons have to be provided for seeking access. Where Grove

holds information to which a person is entitled to access, it will endeavour to provide a suitable range of choices as to how access may be given.

If a person believes that information held by Grove is incorrect, incomplete or inaccurate they may request amendment of that personal information. Grove will consider any such request and if it is in agreement, make the relevant amendment. If Grove is not in agreement that the information requires amendment, it will ensure that it places with that person's personal information a statement to the effect explaining the person's reasons as to why that person is of the view that the information is inaccurate or incomplete.

## **5. COMPLAINTS PROCEDURE**

Grove is committed to providing those persons whose personal information it holds, a fair and responsible system for the handling of complaints concerning the collection, accuracy or disclosure of personal information.

Grove has a designated Privacy Officer whose role includes dealing with complaints, concerns or queries that individuals may have with respect to personal information held by Grove. Should you have any issues concerning your personal information, those queries should be in writing and addressed to the Privacy Officer of Grove at the address referred to in this statement above.

The Privacy Officer is empowered to deal with all such queries and complaints as expeditiously as possible through Grove's complaints handling process. However, if you feel that we have not adequately dealt with your concerns you may refer the matter to the Office of the Federal Privacy Commissioner at:

Postal: GPO Box 5218, Sydney NSW 1042  
Telephone: 1300 363 992  
Facsimile: (02)9284 9666  
Email: [privacy@privacy.gov.au](mailto:privacy@privacy.gov.au)

## **6. CHANGE IN PRIVACY POLICY**

As we plan to ensure that our Privacy Statement and Policy remains current, this Policy is subject to change. Our most current Privacy Statement and Policy will always be available on request and will be published on the Grove website (once operational).