FOSTER STOCKBROKING

PRIVACY POLICY

March 2025

GENERAL

By visiting the Foster Stockbroking Pty Ltd (FSB) (ABN 15 088 747 148) website, you are accepting the practices in this Privacy Policy. This Privacy Policy should be read in conjunction with the Privacy Policy of Finclear, which is outlined in their Financial Services Guides (located in the Dealing and Settlement section of FSB's website).

OUR COMMITMENT TO PRIVACY

FSB respects and upholds your rights to privacy protection. FSB is subject to the Privacy Act 1988 and associated regulations, including the Australian Privacy Principles (APPs) that regulate the handling of personal information about individuals. FSB is part of the Financial Services Industry and as such, is governed by:

- The Corporations & Securities Legislation and the Financial Services Reform Act (FSRA), regulated by the Australian Securities and Investments Commission (ASIC);
- The ASX Operating and Listing Rules;
- ASIC Market Integrity Rules;
- ASX Clear Pty Ltd;
- ASX Settlement Pty Ltd; and
- AUSTRAC and the AML/CTF Act 2006

COLLECTION OF PERSONAL INFORMATION

FSB only collects personal information from you by lawful and fair means and not in any unreasonably intrusive way. Typically, we only collect information about you when you provide it to us or it is provided to us with your authority.

You do not have to provide personal information to us, however, if you do not, we may be unable to provide you with any products and/or service.

FSB undertakes to collect only personal information that is strictly necessary to conduct one or more of its activities or functions in its capacity as a Stockbroker. The information may be collected from you from our application form, or from company share registries and from any enquires we are required to make.

The type of information that we may collect ordinarily includes:

1. Your name, address, telephone number and email address;
2. Drivers licence, birth certificate and/or passport;
3. Your date of birth;
4. Financial institution account details;
5. Government Identifiers such as your tax file number;
6. Personal information such as your occupation and source of funds, and certain financial information; and
7. Transaction details associated with your securities holdings and transactions.

Generally, FSB does not collect sensitive information about you such as race, political or religious belief, sexual preference or health information.

If we receive any unsolicited personal information and it is not information that we would normally collect nor be entitled to collect, then we will destroy the information or ensure that the information is de-identified.

USE OF INFORMATION

We use the information about you:

1. To assist in providing our broking and other services to you, such as execution of share trading and corporate transactions, as well as enabling the distribution of our research products;
2. To maintain, administer and manage our services to you, including settlement and registration;

3. To help us to meet our obligations under the law in relation to dealing and advising on your behalf in the financial products we are licensed to provide;
4. For our marketing and research requirements; and
5. To perform our administrative operations.

IDENTIFIERS

FSB will not adopt as our own any identifiers that you may provide to us such as a Tax File Numbers.

DIRECT MARKETING

We will not engage in direct marketing, and we will not disclose your information to any third-party marketing company.

DISCLOSURE OF INFORMATION

There are certain people to whom and organisations to which we might disclose your information depending on the services we provide to you. These parties are prohibited from using your information except for the specific purpose for which we supply it to them.

We may disclose information about you to our employees and to any of the organisations that we use in the ordinary administration of our business including share registries and to Finclear, our Third Party Clearer.

We may also be required to disclose personal information to any regulatory or other body authorised to request such information. Other bodies to whom we might disclose some of your personal information might include the Australian Tax Office (ATO), the Australian Crimes Commission (ACC), ASX Ltd, the Australian Securities and Investment Commission (ASIC), Australian Transaction Reports and Analysis centre (AUSTRAC), or to the operators of disputes or complaints resolutions schemes

DATA QUALITY

Prior to the use and disclosure of personal information, reasonable steps will be taken to ensure it is relevant and accurate for the purpose for which it is to be used.

DATA SECRUITY

Safeguards will be maintained to ensure that FSB takes reasonable steps to protect personal information against unauthorised access, alteration, destruction, use or disclosure and against accidental loss. For example, we store your personal information in secure hard copy and electronic files. Electronic storage of personal information is protected using access passwords, and access is subject to multi-factor authentication where possible. Access to personal information by employees may be restricted based on employee roles.

FSB also undertakes to conduct staff training on data protection and privacy regulations.

If FSB no longer needs the personal information for any purpose for which the information may be used or disclosed, we will take reasonable steps to destroy the personal information that we hold or to permanently de-identify it. Information will be retained to comply with legislative requirements.

ACCESS AND CORRECTION

You may request access to the personal information we hold about you by telephoning The Compliance Officer on +612 9993 8111. We will endeavour to respond to a request for personal information within a reasonable period of time.

In certain circumstances we may not be able to tell you what personal information we hold about you. These exceptions are detailed in APP 12.3 (a-j) and includes where the information:

- Would have an unreasonable impact on the privacy of other individuals;
- Relates to existing or anticipated legal proceedings with you

- Would reveal information about commercially sensitive decision-making processes; and
- Prevents us by law from disclosing the information, or providing access which would prejudice certain investigations

If we have refused access to your personal information as detailed in APP12.3, then we will provide you with written notice within a reasonable period of our reasons for the refusal (except to the extent that it would be unreasonable to do so) and provide you with the avenues available to lodge a complaint about the refusal.

We may charge you a fee for accessing your personal information.

We endeavour to ensure that the information we hold about you is correct and accurate. Should any of your information be incorrect or inaccurate you may request an amendment of it and, if we agree, we will amend it. If we do not agree with you, then we will provide you with a written notice within a reasonable period of time stating the reasons (except to the extent it would be unreasonable to do so) and the mechanisms available to complain about the refusal.

You should keep us informed of any changes to your information by notifying us in writing. We may also ask you to review, confirm and advise us of any changes to your information.

CROSS-BORDER DISCLOSURE OF PERSONAL INFORMATION

Generally, Foster Stockbroking does not disclose personal information to overseas recipients, unless required to do so by law.

WEBSITE

FSB might record your e-mail address if you enquire via our “Contact” link on this website. Your e-mail address will only be utilised for the purpose for which you have provided it to us and it will not be disclosed to third parties without your prior consent.

Generally, FSB does not attempt to identify users who might browse this website. Users of this site are advised that the Internet is generally not regarded as a secure environment and therefore you should exercise care in transmitting any information.

STATISTICAL INFORMATION

Browsing data from the FSB website may be used by Google Analytics to provide us with general information to assess the usage of our website

CONTACTING US AND COMPLAINTS

If you wish to contact us regarding this policy, or if you wish to make a complaint about the way we may have handled your personal information, or if you believe there has been a breach or potential breach of this Privacy Policy or of the APPs, then please contact our Compliance Manager via the contact details below:

The Compliance Manager
Foster Stockbroking Pty Ltd
Level 9, 275 George Street
Sydney 2000
Tel +612 9993 8111

We will endeavour to resolve your complaint promptly and satisfactorily. However, if you do not think that we have resolved your complaint satisfactorily, or if we have not responded within 30 days, you can contact the Office of the Australian Information Commissioner (OAIC) on 1300 363 992
or http://www.oaic.gov.au/privacy/making-a-privacy-complaint

CLIENT AGREEMENT

By continuing to do business with FSB you agree to us collecting, using and disclosing information in accordance with this privacy policy.

Please note that this privacy policy may change from time to time due to changing business requirements or to changes in privacy regulation. We suggest you periodically review our privacy policy for any changes that may have occurred. We will publish the updated policy on our website.

More information on the Australian Privacy Principles and privacy in general can be found on the Office of the Australian Information Commissioner (OAIC)website at www.oaic.gov.au