

## **Privacy Policy – Ross Private Capital**

Ross Private Capital recognises the importance of the personal information we hold and the trust placed in us by individuals who engage with our firm. This Privacy Policy explains how we collect, use, disclose, and protect personal information in connection with our Australian operations.

We handle personal information in accordance with the Australian Privacy Principles under the Privacy Act 1988 (Cth). In some instances, we may provide additional privacy disclosures related to particular services or circumstances. Where such materials differ from this Policy, the more specific disclosure will apply.

### **What is Personal Information?**

Personal information is information or an opinion about an identifiable individual, or an individual who can reasonably be identified, whether the information is recorded or not, and whether it is true or not.

### **Types of Personal Information We Collect**

Depending on how you interact with us, the information we collect may include:

- name
- address
- date of birth
- contact details (email, phone number)
- nationality and residency status
- financial information
- tax file number (where legally permitted)
- employment and education history
- identification document details (passport, driver's licence, etc.)
- information required to make or receive payments or perform transactions on your behalf

Sensitive information may be collected with consent or where required by law.

### **How We Collect Information**

We may collect personal information directly from you when you request services, update details, communicate with us, or use our website. We may also collect information from service providers, regulatory bodies, publicly available sources, and professional advisers.

### **How We Hold Personal Information**

Information may be stored in secure physical files, internal systems, or cloud storage environments with access restricted to authorised personnel.

## **Security of Personal Information**

We use reasonable steps to protect personal information from misuse, loss, unauthorised access, modification, or disclosure. Data no longer required is securely destroyed or de-identified unless retention is required by law.

## **Why We Collect, Use, and Disclose Information**

We may handle personal information for:

- establishing and managing client relationships
- carrying out instructions or responding to enquiries
- due diligence and verification processes
- managing accounts and related services
- administrative operations
- risk and compliance activities
- improving services and systems
- notifying you of services or events (unless you opt out)
- managing legal or regulatory matters

## **Disclosure of Personal Information**

We may disclose information to service providers, advisers, regulators, courts, financial intermediaries, or other parties as required by law or with your consent.

## **Overseas Disclosure**

Some service providers or related parties may be located outside Australia. By engaging with us, you consent to the possibility of overseas disclosure. We take reasonable steps to ensure handling consistent with this Policy.

## **Website and Cookies**

We may collect statistical and usage information when you visit our website. Cookies may be used for functionality; disabling them may limit performance. External sites linked from ours are not under our control.

## **Access to Personal Information**

You may request access to your personal information. Access may be refused where legally permitted. A reasonable fee may be charged.

## **Correction of Personal Information**

You may request corrections to information we hold. If we cannot make the correction, we will inform you of the reason where appropriate.

## **Direct Marketing**

We may contact you with information about services or events. You may opt out at any time.

**Complaints**

If you have concerns about how we handle personal information, you may contact us. If unresolved, you may contact the Office of the Australian Information Commissioner (OAIC).

**Changes to This Policy**

We may update this Policy periodically.

**Contact Us**

Ross Private Capital

Sydney, NSW, Australia

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