



PELTON  
CAPITAL

## Privacy Policy

Central to Peloton Capital Pty Ltd's ('**Peloton Capital**') success is our commitment to our current and potential customers. We honour our obligation to respect and protect the privacy of the personal information of individuals with whom we deal and to be open and transparent in how we manage your personal information.

### **Your Personal Information and Sensitive Information**

We must collect personal information in order to provide you with financial advice, services and process your investment decisions efficiently. We will only collect that information which is reasonably necessary to allow us to provide the services that you require of us.

We do not collect sensitive information about you without your consent such as racial or ethnic origin, political opinions, membership of political, professional or trade associations, religious beliefs, sexual preferences, criminal record, health or disability information.

Any personal or sensitive information that we collect from you will only be used for the purpose for which it was collected subject to the exceptions if it is required by law or is necessary in handling a legal claim.

### **Collection of Information**

We normally collect personal information directly from you but if you have consented, or would reasonably expect us to, we may collect personal information from a third party as well (for example in order to verify your identity and for customer due diligence purposes, or for the prevention and detection of money laundering and terrorist financing).

The types of personal information that Peloton Capital collects will depend on the nature of your dealings with us.

We only collect personal information about you which is reasonably necessary to:

- Set up, manage and administer financial products and financial services;
- Assess your financial product and service needs;
- Determine your requirements and provide the appropriate financial product or service to meet your needs;
- Provide financial product advice and financial services;
- Perform securities transactions; and
- Identify clients.

We do not collect personal information about you if you only browse our website, but do collect login details of registered users of our website. In all other circumstances, the website only uses session cookies during a search query of the website. When you close your browser the session cookie is destroyed and no personal information is kept which might identify you to us in the future.

We may also use personal information to send you research reports and information on related services we provide, which may be of benefit to you.

We generally hold personal information relating to:

- the products and services we provide or have provided to you,
- your name, date of birth, bank account details, shareholding details, tax file number,
- investment experience and objectives, risk profile,
- your financial interests and sometimes your financial position,
- your contact details.

While we are required under certain circumstances to collect government identifiers such as your tax file number, we do not use or disclose this information other than when required or authorised by law or unless you have voluntarily consented to disclose this information to any third party.

## **How We Collect That Information**

Peloton Capital may collect personal information in the following ways:

- When you complete an application form for a financial product or service, or a related form required for administering or managing the product or service we are providing.
- By telephone, email or facsimile.
- When you meet with one of our advisers.
- In correspondence.
- Completed questionnaires.
- When you provide a change of details eg. address or banking details.

Peloton Capital will only collect personal information that is necessary for us to properly provide our services to you. In most cases we will collect information directly from you. Sometimes personal information may be collected about you from other sources. Examples of where we may receive personal information from another source and why this would happen are:

- From share registries;
- From other organisations providing outsourced functions on our behalf or on behalf of whom we provide outsourced functions; and
- From credit reporting agencies if necessary to provide products or services.

Where it is practical to do so, we will seek a signed authorisation from you to allow us to obtain information from third party organisations.

## **Uses of Information**

Any personal information we collect from you may be made available to, or used by your adviser, employees of Peloton Capital or any entity carrying out functions on behalf of Peloton Capital for the purposes related to the provision of financial services. This may include:

- making securities and investment recommendations;
- reviewing your securities and investment recommendations; or
- to verify your identity and for customer due diligence purposes.

Information provided will be held in the strictest confidence by us. We do not give information about you to anyone else unless one of the following applies:

- it is necessary in order to provide you with the financial services you expect us to, or we have told you we will;
- you have consented; or

- it is required or authorised by law.

If you do not consent to such disclosure, we will not be able to provide you with any financial services. The types of organisations to whom we typically disclose your personal information includes information technology providers (for the purpose of maintenance of our IT systems) and related service providers, a settlement and clearer organisation, product issuers, organisations undertaking compliance reviews of our representatives or other due diligence undertaken on us or our representatives.

If we have to transfer personal information outside Australia, we will comply with trans-border data flow standards under the *Privacy Act 1988*, for example, by taking reasonable steps to protect the information being held, used or disclosed by the recipient is not in breach of the Australian Privacy Principles.

Should you wish to authorise the disclosure of your personal information to other parties, eg. your Accountant, please notify us in writing.

We may use personal information collected from you to advise you about other financial products and services, or survey your opinions on products or services. You may elect not to receive such information by contacting your advisers or writing to our Privacy Officer, in which case, we will record that you do not want to receive marketing material.

## **Your choices**

If you choose to not provide information about your identity and your personal information, or information that is incomplete or inaccurate, it may:

- mean that we cannot provide you with financial services;
- result in you paying more tax than may otherwise apply; or
- result in the provision of a financial service that is not appropriate to your circumstances, needs and objectives.

## **Access**

You may request access to the personal information that we hold about you and ask us to correct personal information we hold. We will respond to your request in a reasonable timeframe. We are bound by the Australian Privacy Principles and reserve the right to charge a fee for supplying the information and in some circumstances, may deny access to the information, in which case we will provide you in writing with the reason for the denial of access.

## **Accuracy of Records**

We take all reasonable steps to ensure that all information we hold is as accurate as is possible, up-to-date and complete. You are able to contact us at any time and ask for its correction if you feel the information we have about you is inaccurate or incomplete. We will take reasonable steps to correct personal information to ensure that it is correct, update-to-date complete, relevant and not misleading if we believe that it needs to be corrected or you request it be corrected.

We will destroy or de-identify personal information when it is no longer needed.

## **Links**

From time to time Peloton Capital may provide access to external websites through links provided on our website. Be aware when you access one of these websites, we are not responsible for the privacy practices of that site. We suggest that you review the privacy policies of each site you visit.

## Complaints

We are committed to providing quality services to our clients. This commitment extends to providing accessible complaint resolution mechanisms for our clients. If you have any complaint about the treatment of your personal information or if you would like to discuss our Privacy Policy, you should take the following steps:

Please write to or email our complaints officer at:

Complaints Officer  
Peloton Capital Pty Ltd  
Level 5, 56 Pitt Street  
Sydney NSW 2000

[admin@pelotoncapital.com.au](mailto:admin@pelotoncapital.com.au)

We will review and assess your issue and provide feedback to you as quickly as possible. If you remain unsatisfied with our handling of the issue you have raised you may refer your complaint to the Privacy Commissioner.

## How to contact us

You can write to us at:

The Privacy Officer  
Peloton Capital Pty Ltd  
Level 5, 56 Pitt Street  
Sydney NSW 2000

**You can submit a request by email to:**

[admin@pelotoncapital.com.au](mailto:admin@pelotoncapital.com.au)

## Contacting us anonymously

You can contact us anonymously or by using a pseudonym. If you choose not to be identified, however, we are limited in our ability to answer your queries or to provide services to you.

## Further Information

For more information about our Privacy Policy please call us on (02) 8651 7800.

For more information on privacy matters in general you can visit the Privacy Commissioner's website at [www.privacy.gov.au](http://www.privacy.gov.au).

## Updating our Privacy Policy

From time to time we may review, amend or revise our Privacy Policy. Any changes will be consistent with the requirements of the current privacy legislation. The updated Privacy Policy will be posted on our website : [www.pelotoncapital.com.au](http://www.pelotoncapital.com.au).

Last Update March 2014.