

**ACNS Capital Markets Pty Ltd trading as Alto Capital**  
**ABN 93 088 503 208**

## **Your Privacy**

Central to Alto Capital's 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. This Privacy policy outlines our open and transparent management of personal information and is based on the Australian Privacy Principles issued by the Office of the Australian Information Commissioner.

### **Notification of the collection of personal information**

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

Whenever it is reasonable and practicable to do so, we only collect information about you, directly from you.

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;
- Provide margin lending services;
- Perform securities transactions; and
- Identify clients.

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.

If we do not collect this information from you we will not be able to provide you with our products and services.

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,
- investment experience and objectives, risk profile
- your financial interests and sometimes your financial position.
- your contact details.

### **How We Collect That Information**

Alto 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.
- Our web sites use "Session" cookies which are short-lived, used only during a

browsing session and expire when the individual quits their browser. Cookies are pieces of information used for tracking site usage and user navigation.

Alto 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.

### **How that Information is used**

Alto Capital will use the personal information we collect to provide you with the required product or service and to enhance the financial service relationship we have with you. To enable us to do this we may share your personal information with a company with whom Alto Capital has a commercial arrangement which provides services to Alto Capital's customers.

Customer information may also be used for providing a service requested by you, planning, product development and research purposes.

We only use and disclose personal information about you for the purpose for which it was disclosed to us or related purposes which would reasonably be expected, without your permission.

For example, we may from time to time use your personal information to inform you of other products and services which we expect may be of interest to you. However, we do respect your right to ask us not to do this.

We may need to disclose your personal information to a third party for a number of reasons, they may include:

- Mail service providers for the mailing of information.
- Organisations with whom Alto Capital has a contractual arrangement to provide stockbroking and related services. Customer information will be collected by Alto Capital on behalf of the company and disclosed to the company as authorised by the customer.
- Credit reporting agencies when seeking credit reports in connection with the establishment of certain financial services and the collection of any overdue payments.
- Share registries and other organisations for trading and investment purposes.
- We may from time to time be required to provide information to a regulatory authority eg. Australian Securities & Investments Commission or some other Commonwealth Government agency eg. the Australian Taxation Office or to a court in response to a subpoena.

### **Quality of personal information**

We will take reasonable steps to ensure the personal information we collect is accurate, up to date and complete. We will also take reasonable steps to ensure the personal information we use or disclose is accurate, up to date, complete and relevant, having regard to the purpose of the use or disclosure.

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.

### **Anonymity and Pseudonymity.**

The Privacy Principals include an obligation to provide you an option of dealing with us using a pseudonym. However this obligation is subject to certain limited exceptions including where it is impracticable for us to deal with you if you have not identified yourself. Because of the services we provide we are required to identify you in order to comply with other legal obligations under the AML/CTF Act.

### **Direct Marketing**

We will only disclose personal information for direct marketing purposes where you have consented for us to do so, or you have a reasonable expectation that your personal information will be used for this purpose, where we do use your information for direct marketing purposes you will have the option to opt- out at any time.

### **Cross-border disclosures**

Alto Capital will not knowingly provide your personal information to any overseas jurisdictions.

### **Adoption, use or disclosure of government related identifiers**

Alto Capital does not adopt government related identifiers of an individual as its own identifier. Alto Capital may disclose your tax file number to share registries and our execution and settlement providers for taxation purposes. These records are destroyed or de-identified after they have been provided to these external parties and are not retained as a record by Alto Capital.

### **Security of Personal information**

We store your personal information in different ways, these include both paper and Electronic. We use security procedures and the latest technology to protect the information we hold. Access to and use of personal information within Alto Capital is limited to prevent misuse or unlawful disclosure of the information.

If other organisations provide support services, we require them to appropriately safeguard the privacy of the information provided to them. We have procedures to meet our obligations to destroy or de-identify personal information in certain circumstances.

## **Notifiable Data Breaches Scheme**

When the Australian Parliament passed the Privacy Amendment (Notifiable Data Breaches) Act 2017 (NDB scheme) on 13 Feb 2017, it started a process that means from 22 February 2018 Alto will be obliged to report eligible data breaches.

Alto will be required to take all reasonable steps to ensure an assessment is completed within 30 days. If an eligible data breach is confirmed, as soon as practicable they must provide a statement to each of the individuals whose data was breached or who are at risk, including details of the breach and recommendations of the steps individuals should take. A copy of the statement must also be provided to the Office of the Australian Information Commissioner (OAIC).

## **Cookies**

A cookie is a small data file that contains information about your visit to a web site. "Session" cookies exist only for the duration you are connected to our website. These cookies are necessary to verify your identity during your visit. Once you exit the web site, the session cookie is removed.

We also use "persistent cookies" to track your visits within our site for the purpose of convenience when browsing our web site. Alto Capital uses persistent cookies to store information of which you are aware and have agreed to (such as which postings you have read on the forum.)

Most browsers are initially set up to accept cookies. If you are concerned about receiving cookies you can reset your web browser program to refuse all cookies or to warn you before accepting cookies. If you have set your browser to warn you before accepting cookies, you will receive the warning message with each cookie. Alto Capital cannot guarantee or accept responsibility for the privacy practices or the content of web sites to which we provide links.

## **Traffic Monitoring**

As well as collecting information such as contact and address details, our servers will also record traffic statistics such as the number of visitors to our site, the date and the time of the visits, the numbers pages viewed, etc. These details are primarily used for optimising our site and its performance. Any details recorded are anonymous and we cannot link your identity to these statistics.

We may also record telephone conversations for the purposes of staff training, compliance monitoring and ensuring orders that have been taken from customers are passed correctly to the issuer of that product.

## **Links**

From time to time Alto 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.

## **Access and correction**

If you would like to access the personal information that we hold about you simply contact our Privacy Officer on (08) 9223 9888. We will respond to your requests for access within a reasonable period, in the manner requested, if it is reasonable for us to do so.

If we decide not to provide you with access we will provide the reasons in writing for the refusal and the mechanisms available to complain about the refusal.

If we are required to charge you to an organisation charges an individual for giving access to the individual's personal information, the charge must not be excessive, and must not apply to the making of the request.