

# EDGEHAVEN

## Edgehaven Privacy Policy

**This Privacy Policy is valid for Edgehaven Pty Ltd and Edgehaven Ltd**

### Introduction

We take your data privacy seriously. This Privacy Policy is to tell you what information we collect about you now and in the future and how we collect it, what we use it for, whom we share it with and how we protect that information. It also tells you how you can contact us and how we make changes to our Policy, as well as your rights concerning information we hold about you.

### What information we may collect about you

We collect information that you would expect to find on a business card, such as your name, job title, telephone and email address, the name of your employer and their physical and electronic addresses. This is usually information you provide us yourself, but it may come to us from elsewhere, such as publicly-available third-party sources or through introductions by mutual acquaintances or associates.

We also collect summary information about communications and interactions we have with you in the course of our business, for example at professional conferences, by telephone or email and face-to-face meetings, or if you elect to receive marketing or research material from us.

### What we use your information for

We use the information you choose to provide to us to communicate with you, for example to provide you with research, news and information about updates and changes to our services and products, as well as to provide services to you and manage and to improve those services.

We also use it to comply with applicable laws and regulations, such as anti-money laundering and anti-terrorism.

## **Who we share your information with**

Anyone you authorise us to disclose your information to;

Other companies in the Edgehaven group, employees, agents and professional advisors that perform specific activities on our behalf;

Government and regulatory authorities to which we are legally obliged to provide information, and fraud-avoidance schemes that we participate in.

## **How we protect your information**

While no data transmission over the internet or on a website can be guaranteed to be secure from intrusion, we use both technical and organisational precautions to maintain the highest possible standards of physical, electronic and procedural safeguards. Information we hold about you is stored on secure servers, with access strictly limited to a small number of senior executives.

We will retain your personal information only for as long as is necessary to provide services to you, as we describe above, or to comply with legal or regulatory requirements. But note that even if we delete your data, we may need to retain it in backups and archives for legal, tax or regulatory reasons.

## **Outside the European Economic Area (EEA)**

We may need to send your information to countries outside the EEA, for example for storage on servers in a non-EEA country, or for processing by our employees, agents or professional advisers and other companies in the Edgehaven group, some of whom are in non-EEA countries.

We will transfer your information only using secure technology and to countries where your information has adequate legal protection.

Consistent with our internal data protection, we maintain safeguards and procedures with the third parties we share your data with.

## **Changes to this Policy**

We constantly review how we process and protect information we hold, so this Policy may change from time to time. If these changes are material, we will take reasonable steps to notify you of them. This policy was last updated as of 31<sup>st</sup> March 2018.

## Cookies

With your consent, we may use cookies to keep track of your activities on our website. These are small files placed on your computer when you visit a web site and are used to store non-personal information such as your type of web browser and website preferences.

Our cookies do not collect any personal identifying or confidential information.

## How to contact us

Our data controller can be reached by email at [brucedurston@edgehaven.com](mailto:brucedurston@edgehaven.com) or by letter at:

Edgehaven Pty Ltd  
PO Box 5100  
Chittaway Bay  
NSW  
2261  
Australia

## Your rights

If you contact us you can:

Request details about what information we hold about you, what it is, or will be, used for, and what sort of third party it might be shared with. You can also obtain a readable copy of it;

Instruct us to restrict processing of your information, or to change, correct or delete it. Please note that we may retain archived information about you in order to comply with relevant laws;

Withdraw your consent to use your information or to be contacted by us;

If you believe that we have not complied with your data protection rights, we encourage you to contact us first so that we can investigate and resolve the matter directly with you. In any case you can complain to the relevant data protection supervisory authority.

In the UK this is ICO (more information can be found on <https://ico.org.uk/concerns/>).

In Australia this is the OAIC (more information can be found on <https://www.oaic.gov.au/>).

**Updated as of March 31<sup>st</sup> 2018**