PRIVACY POLICY

Conexus Financial Pty Ltd [ABN 51 120 292 257], (referred to as “Conexus”, “us”, “we” or “our”), are committed to protecting the privacy of the personal information that we collect and complying with the Privacy Act 1988(Cth) (“the Privacy Act”). This privacy policy sets out how we comply with our privacy obligations and how we collect and manage the personal information that you provide us. By submitting personal information to us, you agree to our use of your personal information as described herein. This privacy policy applies to all persons who interact with us, including those who are advertisers, subscribers to our goods or services and registered and unregistered users of Conexus services. Your use of all websites owned or operated on behalf of Conexus, including those available via: www.conexusfinancial.com.au, www.professionalplanner.com.au, www.investmentmagazine.com.au and www.top1000funds.com, and any current social media accounts and event websites (collectively referred to as “Sites”) is subject to this privacy policy.

This privacy policy will not directly address issues surrounding personal information and its collection and use in the course of journalism, but where applicable to its publications, Conexus complies with the Australian Press Council Privacy Standards at http://www.presscouncil.org.au/privacy-principles.

1. What is your personal information?

The term “personal information” has the meaning given to it in the Privacy Act. Personal Information includes information or an opinion about an identified individual, or an individual who is reasonably identifiable from the information or opinion. In summary, personal information is any information about you that can be linked to you.

2. What personal information do we collect and hold?

**Personal Information.** We collect information through all our services including digital services subscription, advertising services, events, websites, mobile sites, applications (“apps”), and widgets, competitions and customer surveys (collectively, the “Services”). We collect the personal information needed to provide the Services and for our business operations. The personal information collected may consist of your name, address, telephone number, email address, job information, unique site access id, contact information, job applications if you are seeking employment, details of services you have used or enquired about, or other information about you.

**Sensitive Information.** Sensitive information is a specific category of personal information. Such information includes information related to racial or ethnic origin, religion or other beliefs, membership of a trade union or a profession or trade association, health information, criminal record and the like. We do not usually collect sensitive information about you and if we do, we will get your specific consent prior to the collection and use of this information. We ask that you do not send us, and you do not disclose, any sensitive personal information on or through our Services, or otherwise, unless expressly requested.

We collect some information that is not personal information, because it is not linked to you or any other
3. **How do we collect and hold your personal information?**

We collect your personal information directly from you or via the Sites, in order for you to use our Services unless it is unreasonable or impracticable to do so. If you do not wish to provide personal information to us, then you do not have to do so, however, it may affect your use of the Sites or any products and Services offered on it.

4. **What information do we collect?**

**Registration Information** is the information you provide to us in the course of registering for or acquiring our Services, for example, to create an account, become a subscriber, become an advertiser, post comments, receive a newsletter, attend an event or enter a competition. Where possible, as required by law, you may have the option of interacting with us anonymously (for example when browsing our digital products as a casual user) or using a pseudonym. We will usually make it clear whenever this is an option. This information is hosted by a third party supplier. **We have taken all steps to ensure that 3rd parties deal with personal information according to the same standards we subscribe to.**

**Public Information and Posts** consist of comments or content that you post to the Services and the information about you that accompanies those posts or content, which may include a name, user name, comments, likes, tweets, status, profile information and picture(s). Public Information and Posts are always public, which means they are available to everyone and may be displayed in search results on external search engines.

**Information from Third Party Social Media.** If you access or log-in to our Services through a third party social media service, or connect our Services to a third party social media service, the information we collect may also include your user ID and/or user name associated with that social media service, any information or content you have permitted the third party social media service to share with us, such as your profile picture, email address, followers or friends lists, and any information you have disclosed in connection with that social media service.

**Activity Information – Cookies and Other Technologies.** When you access and interact with our Services, we may collect certain information about those visits. For example, in order to permit your connection to our Services, our servers receive and record information about your computer, device, and browser, including potentially your IP address, browser type, and other software or hardware information. If you access our Services from a mobile or other device, we may collect a unique device identifier assigned to that device, geolocation data, or other transactional information from that device.

Cookies and other tracking technologies (such as browser cookies and local storage, pixel beacons, and Adobe Flash technology including cookies) are comprised of small bits of data or code that often include a de-identified or anonymous unique identifier. Websites, apps and other services send this data to your browser when you first request a web page and then store the data on your computer so that such websites, apps and other services can access information when you make subsequent requests for pages from that service. These technologies may also be used to collect and store information, such as pages you have visited, content you have viewed, search queries you have run and advertisements you have
viewed in relation to your usage of the Services and other websites you have visited. Most browsers are initially set to accept cookies, but you can change your settings to notify you when a cookie is being set or updated, or to block cookies altogether. Users can manage the use of Flash technologies, with the Flash management tools available at Adobe’s website. Please note that by blocking any or all cookies you may not have access to certain features, content or personalisation available through the Services.

Third parties that support the Services by serving advertisements or providing services, such as allowing you to share content or track aggregate Services usage statistics, may also use these technologies to collect similar information. We do not control these third-party technologies and their use is governed by the privacy policies of those third parties.

Information from Other Sources. We may supplement the information we collect with solicited personal information from other sources, such as commercially available sources, websites and data providers, as well as information from our business partners or affiliated companies in Australia or internationally.

Information in relation to employment/engagement with us. When you apply for a job or contract with us we may collect certain information from you or from any recruitment consultant, your previous employers and others who may be able to provide information to assist us in deciding whether or not to make you an offer of employment or engage you under a contract. We also collect personal information about individuals who are, or are employed by, our suppliers (including service and content providers), contractors, dealers, agents and corporate customers.

Collection of Personal Financial Information by a Payment Service. In some cases, we use an unaffiliated payment service to allow you to purchase a product or make payments (“Payment Service”). If you wish to purchase a product or make a payment using a Payment Service, you will be directed to a Payment Service webpage. Any information that you provide to a Payment Service will be subject to the applicable Payment Service's privacy policy, rather than this privacy policy. We have no control over, and are not responsible for, any Payment Service’s use of information collected through any Payment Service.

Linked Services. The Services may also be linked to sites operated by unaffiliated companies, and may carry advertisements or offer content, functionality, newsletters, competitions or applications developed and maintained by unaffiliated companies. Conexus is not responsible for the privacy practices of unaffiliated companies, and once you leave the Conexus Services or click an advertisement you should check the applicable privacy policy of the other service.

5. How do we use your personal information?

We use the information we collect from and about you for the primary purpose of providing our Services and features to you, including: to measure and improve those Services and features; to improve your experience with both online and off-line services, by delivering content we believe you are likely to find relevant and interesting, including advertising and marketing messages; to allow you to comment on content, and participate in surveys or competitions; to provide you with customer support and to respond to inquiries.

We use the information we collect from and about you for these additional purposes:
To provide Services to you. We will use your personal information to provide Services to you, to fulfil administrative functions associated with these Services (for example billing, credit and account management), to enter into contracts with you or third parties and for marketing and client relationship purposes. Where your information is contained within an advertisement which we publish for you. We may also use your information for publication of that same advertisement in other media, in accordance with the terms and conditions applicable to the initial publication of the advertisement. We may also use your information to improve Services, including through research and data analysis by us and our service providers. Where your personal information is contained in a user generated post or in a communication to an editor or journalist, we may publish your name and suburb, to identify you as the author of the comment/correspondence, if we choose to publish comment/correspondence in any media. We may use and disclose your personal information in other ways expressly disclosed at the point of collection. If you are a competition winner, we may disclose your information to relevant regulatory authorities and publish your details in accordance with the competition terms.

To allow service and content providers to assist us in providing and managing the Services. We may make your information available to certain third party service and content providers, such as providers of data cloud services, website hosting service providers, debt collection services and direct marketing services, who help us manage or provide the Services. We require these service and content providers to comply with relevant privacy laws and not to use personal information which we provide for any purpose other than the specific service they are providing to you and/or us.

To allow social sharing functionality. If you log in with or connect a social media service account with the Services, we may share your user name, picture, tweets and likes, as well as your activities and comments with other Services users and with your friends associated with your social media service. We may also share the same information with the social media service provider. By logging in with or connecting your Services account with a social media service, you are authorising us to share information we collect from and about you, with the social media service provider, other users and your friends; the use of that shared information will be governed by the social media service’s privacy policy. If you do not want your personal information shared in this way, please do not connect your social media service account with your Services account and do not participate in social sharing on the Services. If you have linked any of your social media accounts to your account for any Company Services, you can cancel that link by changing your account settings.

To provide co-branded services and features. We may offer co-branded services or features, such as competitions or other promotions together with a third party (“Co-Branded Services”). These Co-Branded Services may be hosted on the Services or on the third party’s service. By virtue of these relationships, we may share the information you submit in connection with the Co-Branded Service with the third party. The third party’s use of your information will be governed by the third party’s privacy policy. We will advise you when this is occurring, or obtain your express consent to share your personal information in these circumstances.

To deliver relevant advertisements. We and our advertisers may use the information we collect from and about you to deliver relevant ads to you when you use the Services or another service. Most advertising is delivered using Google DoubleClick and any of the following services may be enabled: Remarketing, Google Display Network Impression Reporting, the DoubleClick Campaign Manager integration, or Google Analytics Demographics and Interest Reporting. By using these services, third-party vendors, including Google, may show our ads on sites across the Internet. We and third-party vendors, including Google, use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick cookie) together to inform, optimise, and serve ads based on your past visits to our Sites. Data stored by us (such as anonymous unique identifiers and interests) and/or 3rd-party audience data (such as age, gender, and interests) may be used in connection with Google's Interest-based advertising or may be
shared with Google Analytics. You can block or delete cookies through your browser settings but be aware that if you do this you may not be able to continue to receive some Company Services. In addition, this may not be sufficient to block or opt-out of all activities which track the usage of a device or which deliver targeted content. If you wish to obtain more information about how your previous usage of the Internet may be used to determine the ads that you see when you use the Company Services, go to https://www.google.com/settings/ads and to opt out of receiving this type of advertising go to https://tools.google.com/dlpage/gaoptout/.

To contact you. We may periodically send promotional materials or notifications which we believe might be of interest to you. Promotional materials may include invitations to participate in various activities (such as surveys), events or special offers.

To share with business partners. Where you have expressly consented to this, we may share your information with business partners to permit them to send you marketing communications consistent with your choices. Where we share your information with our related companies, they may use your information, in the same way as we can, under this Privacy Policy.

We will not share your information with anyone else. Exceptions may occur where:

- Conexus believes in good faith that you have consented
- A law enforcement agency, or other government agency, is exercising its legal authority and has asked us to provide access to that information
- The information is required to help identify any abuse or attempt to abuse or compromise the integrity or security of the Sites or any web sites connected to them; or
- Conexus discloses anonymous, aggregated, statistical information to non-Conexus third parties such as advertisers, promoters and business partners
- To complete a merger or sale of assets. If Conexus sells all or part of its business, or makes a sale or transfer of its assets, or is otherwise involved in a merger or transfer of all or a material part of its business, Conexus may transfer or disclose your information to the party or parties involved in the transaction, as part of that transaction and as part of any due diligence processes which take place in contemplation of a potential transaction.

6. How do we protect your information?

Conexus uses commercially reasonable administrative, technical, personnel and physical measures to safeguard information in its possession against loss, theft and unauthorised use, disclosure or modification. However, no one can guarantee the complete safety of your information. As the Sites are linked to the internet and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any information which you transmit to us online is transmitted at your own risk.

7. Do we disclose your personal information to anyone outside Australia?

We may disclose information to our business partners, customers, service providers and other third party suppliers located overseas for some of the purposes listed above. These overseas entities may be located in United States of America, United Kingdom and Japan. Some of the Services are hosted in and managed
outside of Australia and in dealing with us, you consent to having any personal information accessible from or transmitted outside of Australia. Our customers may access our Services from outside Australia. Cross-border disclosure of personal information by Conexus or our business partners or third party suppliers is addressed by our contractual arrangements and by the privacy policies and procedures of those persons.

8. Direct Marketing

We may send you direct marketing communications and information about our products and services that we consider might be of interest to you. These communications may be sent in various forms, including email, mail and SMS in accordance with applicable marketing laws, such as the Spam Act 2003 (Cth). You consent to receiving direct marketing communications and information from us. However, at any time you may opt out of receiving marketing communications from us by contacting us (see details below) or by using opt out facilities provided in the marketing communications and then we will ensure that your name is removed from our mailing list.

9. How can you access and correct your information?

You may request access to any personal information we hold about you that is in our control at any time by contacting us. Where we hold information you are entitled to access, we will try and provide you with a suitable means of accessing it (for example by mailing or emailing it to you). We will not charge for making a request, but reserve the right to make a reasonable charge for the cost of providing the information. To do so please contact the Privacy Officer as outlined in section 10 of this policy. Requests must be made in writing with sufficient identification, to ensure that we do not give your details to someone else. We will also take such steps as are reasonable in the circumstances to correct personal information in our control which is identified to be inaccurate, out of date, incomplete, irrelevant or misleading. You may also have your personal information deleted. You should be aware that we will retain your information for the period necessary to fulfil the purposes outlined in this Privacy Policy unless a longer retention period is required or allowed by law. Such information will not be deleted. We may also retain backup information related to your account on our servers for some time after cancelation for fraud detection or to comply with applicable law or our internal security or other policies. We will let you know if we cannot delete your personal information or give you access to it for legal or other reasons. Remember that even after you cancel your account, copies of some information from your account may remain viewable in some circumstances where, for example, you have shared information with social media or other services. Because of the nature of caching technology, your account may not be instantly inaccessible to others.

10. How You Can Contact Us

If you have questions about this Privacy Policy, please contact our Privacy Officer at:

Email: info@conexusfinancial.com.au
Our Privacy Officer will contact you within a reasonable time after receipt of your request or complaint, to discuss your concerns and outline options regarding how they might be resolved.

**Complaints.** If you think we have breached the Privacy Act or other applicable privacy laws, you may complain to us by contacting us as outlined in this section above. When you contact us, please include your email address, name, address, and telephone number and clearly describe your complaint. We will need to share your information with others who can assist in responding to your complaint. We will respond to your complaint as soon as reasonably practicable and in any event within 5 business days, by making contact with you to inform you whether we have accepted your complaint, need further information or do not think we are in breach. We will also inform you of the next steps in resolving your complaint. If you are not satisfied with our response to your complaint, or at any other time, you may refer your complaint to the Office of the Australian Information Commissioner at [https://www.oaic.gov.au](https://www.oaic.gov.au)

General information about privacy may be found via:


We may change this privacy policy from time to time and all personal information held by us will be governed by the most recent version of our privacy policy. Any updated versions of this policy will be posted on the Site.

June 27, 2016.