# PRIVACY POLICY

CENTRA WEALTH GROUP
THE CENTRE OF YOUR FINANCIAL WELLBEING

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## 1. Overview

The purpose of the Privacy Policy is to outline how the Centra Wealth Group of business entities and its officers, advisers, agents and employees collect, use and retain personal and sensitive information. Centra obtains and retains that personal and sensitive information in accordance with the Australian Privacy Principles (APPs). The APPs were introduced by the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth) (Privacy Amendment Act). The Privacy Amendment Act introduced significant changes to the Privacy Act 1988 (Cth) (Privacy Act). The Privacy Amendment Act includes new, harmonised, privacy principles that regulate the handling of personal information by businesses. This Policy provides guidance on how to meet the privacy obligations imposed by the APPs, the Privacy Amendment Act and the Privacy Act.

**Purpose**

The Policy explains our policies and practices with respect to the collection and management of personal information we collect from you.

The Privacy Act requires us to handle your personal information in accordance with a set of principles, known as the Australian Privacy Principles (APPs). Those Principles and our approach to those Principles are set out below.

**Scope**

The Policy applies to all officers, advisers, agents, employees, clients and shareholders of the Centra Wealth Group. The Centra Wealth Group includes the following entities: Centra Wealth Pty Ltd, Centra Financial Pty Ltd and Centra Money Pty Ltd and all of its wholly-owned subsidiaries and trading names including Centra Securities, Centra Asset Management and Centra Wealth Academy together referred to in this Policy as “The CENTRA WEALTH Group”, “CENTRA”, “us”, “our” or "we".

The APPs and the Privacy Act extend to an act done, or practice engaged in that has an Australian link. An organisation has an Australian link where it is:

(a) an Australian citizen or a person whose continued presence in Australia is not subject to a legal time limitation;
(b) a partnership formed, or a trust created in Australia or an external Territory;
(c) a body corporate incorporated in Australia or an external Territory; or
(d) an unincorporated association that has its central management and control in Australia or an external territory.

Where an organisation does not fall within one of the above categories it will still have an Australian link where:

(a) it carries on business in Australia or an external Territory; and
(b) the personal information was collected or held by the organisation or small business operator in Australia or an external Territory, either before or at the time of the act or practice.

## 2. Collection

**Definition**

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

(a) whether the information or opinion is true or not; and
(b) whether the information or opinion is recorded in a material form or not.

What constitutes personal information will vary, depending on whether an individual can be identified or is reasonably identifiable in the particular circumstances.

However, common examples of personal information may include an individual's name, signature, address, telephone number, date of birth, medical records, bank account details, employment details and commentary or opinion about a person.

## What information do we collect?

We will collect and hold your personal information for the purposes of:

- providing products and services to you
- managing and administering the products and services
- letting you know about our other products and services.

The type of information collected from you includes information that is necessary to operate your account or for us to provide advice to you. We may ask you to provide personal information such as your:

- name
- email address
- residential and/or postal address
- date of birth
- contact details
- occupation
- bank account details
- financial details
- employer
- tax file number (TFN).

Much of this information is collected through application forms, the use of our online facilities or through ongoing communications with you.

We will not collect any personal information about you except where you have knowingly provided that information to us or we believe you have authorised a third party to provide that information to us.

There are also specific circumstances in which we will ask for your sensitive information such as:

- personal health information from you when applying for insurance
- personal health information from medical practitioners when you are making a claim
- income information from employers in instances where you are applying for additional insurance protection or salary continuance insurance
- details of your dependents, as defined at section 10 of the *Superannuation Industry (Supervision) Act 1993*, for the purposes of paying benefits in the event of your death.

We will always seek your consent before collecting this kind of sensitive information.

We may also need to collect information from third parties. For example, we may need to collect information from your professional services provider (accountant or lawyer), product issuer and employer.

We are also required to ask for certain information by law. Wherever there is a legal requirement for us to ask for information about you, we will inform you of the obligation and the consequences of not giving us the requested information. For example, in addition to obtaining personal information from you, when you acquire a new product or service from us, we may need to obtain certain documentary evidence from you as to your identity. Such evidence may include items such as a certified copy of your driver's licence, passport or birth certificate.

### Identity verification and customer due diligence:

We are required under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth), as amended by the reforms that commenced on 31 March 2026, to verify your identity and to conduct customer due diligence, including ongoing customer due diligence. We may collect, verify and from time to time re-confirm or update identification information about you for this purpose, and we are required to keep records of that information.

### Recording and transcription of meetings:

To help us understand your needs and provide more accurate advice and records, we may use technology, including AI-assisted tools, to record and transcribe meetings and calls with you. We will seek your consent before recording, and you may decline or withdraw your consent at any time. Any recordings and transcripts we create are treated as personal information and handled in accordance with this Policy.

#### What if you don't give us the information we request?

You are not required to give us the information that we request. However, if you do not give us the information that we ask for, or the information you give is not complete or accurate, this may:

- prevent or delay the processing of your application or any claim
- affect your eligibility for specified insurance cover
- prevent us from contacting you
- impact on the taxation treatment of your account.

For example, we are required to ask for your TFN when you open a bank or equities trading account, including your Superannuation fund accounts, with our service providers. If you choose not to give us your TFN, you may be subject to higher tax charges on your earnings.

## 3. Use of information

#### How do we use the information that we collect from you?

We use your personal information for the purposes for which it has been obtained. We collect your personal information so that we are able to act on your request, such as:

- provide financial advice to you
- establish and manage your investments and accounts
- implement your investment instructions
- establish and maintain insurance protection
- process contributions, transfer monies or pay benefits
- report the investment performance of your account
- keep you up to date on other products and services offered by us.

Personal information will also be used where you have consented to such disclosure or where it is required or authorised under law, in circumstances relating to public health and safety or in connection with certain operations by or on behalf of an enforcement body.

## 4. Disclosure

#### Who do we give information to?

We may provide your information to other related companies within The CENTRA WEALTH Group or external parties. Where personal information is disclosed there are strict controls in place to ensure information is held, used and disclosed in accordance with the APPs.

The types of external organisations to which we may disclose your personal information include:

- any organisations involved in providing, managing or administering our products or services such as actuaries, custodians, external dispute resolution services, insurers, investment managers or mail houses
- your employer (relates only to employer sponsored superannuation arrangements)
- any fund (administrator or trustee) to which your benefit is to be transferred or rolled over
- medical practitioners and other relevant professionals, where you have applied for insurance cover or made a claim for disablement benefit
- your personal representative, or any other person who may be entitled to receive your death benefit or any person contacted to assist us to process that benefit
- any financial institution who holds an account for you
- any professional advisers appointed by us
- businesses that may have referred you to us (for example your Credit Union).

Like other financial services companies, there are situations where we may also disclose your personal information where it is:

- required by law (such as to the Australian Taxation Office)
- authorised by law (such as where we are obliged to disclose information in the public interest or to protect our interests)
- necessary in discharging obligations (such as to foreign governments for the purposes of foreign taxation)
- required to assist in law enforcement (such as to a police force).

We will also disclose your information if you give your consent.

**Will my information be disclosed overseas?**

We may from time to time send limited amounts of your personal information overseas to our service providers or other third parties who operate or hold data outside Australia. Where your information is sent overseas, it will be in the custody of our service providers, who maintain security over the data. Their servers are likely to be one of the following countries:

- United States
- United Kingdom
- Canada
- Germany
- Hong Kong
- India
- Netherlands
- New Zealand
- Philippines
- Singapore
- Canada
- Italy

Where we do this, we make sure that appropriate data handling and security arrangements are in place. Please note that Australian Law may not apply to some of these countries. Where we use AI-assisted meeting recording and transcription tools, the resulting recordings and transcripts are stored on secure servers located in Australia and the United States. This information is handled by our technology service providers under contractual confidentiality and security obligations and is not disclosed to any other entity.

## 5. Access and correction of information

**Can I access my information and what if it is incorrect?**

You may request access to the personal information we hold about you. We may charge a reasonable fee to cover our costs.

There may be circumstances where we are unable to give you access to the information that you have requested. If this is the case we will inform you and explain the reasons why.

We will take reasonable steps to ensure that the personal information we collect, hold, use or disclose is accurate, complete, up to date, relevant and not misleading. Reasonable steps that we may take include updating your personal information from public sources such as a telephone directory.

You have a right to ask us to correct any information we hold about you if you believe it is inaccurate, incomplete, out of date, irrelevant or is misleading. If we do not agree with the corrections you have supplied and refuse to correct the personal information, we are required to give you a written notice to that effect and a statement if requested. If you wish to access your personal information, you should contact us through our offices or by writing to the Privacy Officer. Details of how to contact the Privacy Officer are set out in section 9 below.

## 6. Complaints

If you believe that we have mishandled your personal information, in turn, breaching the APPs, you may lodge a complaint with us. The complaint, addressed to the Privacy Officer, must be in writing in accordance with the Privacy Act 1988. Refer to section 9 for contact details for our Privacy Officer.

From receipt of your written complaint, the Privacy Officer has 30 days to respond.

In the event that the Privacy Officer is unable to resolve your complaint, you may lodge a complaint with the Information Commissioner. You can lodge a written complaint with the Information Commissioner by:

- Submitting an online form through the Information Commissioner's website: www.oaic.gov.au
- Submitting a hard copy form which can be obtained at http://www.oaic.gov.au/images/documents/privacy/privacy-complaints/making-a-privacy-complaint/Privacy_Complaint_Form.docx
- fax to 02 9284 9666
- email at enquiries@oaic.gov.au

## 7. Protection of the personal and sensitive information that we hold

**How do we protect the security of your information?**

We have security systems, practices and procedures in place to safeguard your privacy. Your personal information is stored on third party servers and is subject to regular audit. The people who handle your personal information for us have the training, knowledge, skills and commitment to protect it from unauthorised access or misuse.

Our service providers maintain security of their own copies of the personal information they have collected from you.

If you use the secure member or employer sections of the websites of companies where you hold accounts, then our service providers will verify your identity by your username and password. Once verified, you will have access to secured content.

**Risks of using the internet**

You should note that there are inherent security risks in transmitting information through the internet. You should assess these potential risks when deciding whether to use our online services. If you do not wish to transmit information through our website, there are other ways in which you can provide this information to us. You can, for example, contact our Customer Service team. Refer to section 9 for our Customer Service contact details.

**Cookies**

A "cookie" is a small text file that may be placed on a computer by a web server. Our websites may use cookies which may enable us to identify you or your browser while you are using our site. These cookies may be permanently stored on a computer or are temporary session cookies. They are used for a variety of purposes, including security and personalisation of services. They are frequently used on websites and you can choose if and how a cookie will be accepted by configuring your preferences and options in your browser.

All browsers allow you to be notified when you receive a cookie and you may elect to either accept it or not. If you wish not to accept a cookie, this may impact the effectiveness of the website. Your internet service provider or other IT service provider should be able to assist you with setting your preferences.

## 8. General

**How long do we retain your personal information?**

We are required by law to retain certain records of information for varying lengths of time. Depending on the context surrounding the information, we may be required to retain records which include your personal information from 7 years to permanently. Where your information is not required to be retained under law, we will take reasonable steps to permanently destroy or de-identify your personal information when it is no longer required for the purpose for which it was collected.

Records that we are required to keep under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) — including identification and customer due diligence records — are retained for at least 7 years after the end of our relationship with you.

**Updates to this Privacy Policy**

Unless required earlier, this Privacy Policy is reviewed and updated annually. The most current version of the Privacy Policy can be obtained from our website at http://www.centrawealth.com.au/privacy.

## 9. How do I contact the Privacy Officer or Customer Service?

You can contact our Privacy Officer by email at privacy@centrawealth.com.au or as detailed below:

| Entity | Privacy Officer | Customer Service |
|---|---|---|
| Centra Wealth Pty Ltd<br><br>Centra Financial Pty Ltd<br><br>Centra Money Pty Ltd | The Privacy Officer<br>CENTRA WEALTH GROUP<br>Level 12<br>431 King William Street<br>ADELAIDE SA 5000 | General enquiries (08) 8231 4709 |

## Request for access to Personal Information under the Australian Privacy Principles

Please provide full details in the table below of the types of personal information you seek access to and the entity/ies within the Centra Wealth Group that hold/s that information.

There is no charge for making a request to access your personal information. However in some cases there may be a charge to cover the time we spend locating, compiling and explaining the information you ask for. If there is a charge, we'll give you an estimate up front and confirm that you wish for us to proceed.

### Section 1: Please provide us with the following information

| Personal Information Sought | Entity/product/account number details |
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### Section 2: Your contact details (so we can discuss your request and send you information)

Telephone number ( )

Facsimile number ( )

Email address

Address

State Post Code

Full name

Signature X

Date DD / MM / YYYY

You may post, email or deliver this form to us in person.

We will try to provide you with your information within 30 days. We'll need to verify your identity before completing your request.

In certain circumstances we're allowed to deny or limit the access we provide. If so, we'll let you know in writing our reasons for refusing your request.

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