

Privacy Policy

Laverne Securities Pty Ltd (t/as) INVESTOR DESK

ABN: 34 629 216 477 **AFSL:** 482937

Business Address: Suite 6/96 Wigram Street, Harris Park NSW 2150

Email: info@investordesk.com.au

Phone: 1300 528 376

Web: www.investordesk.com.au

1. Introduction

Laverne Securities Pty Ltd (t/as) Investor Desk (Investor Desk, "we", or "us") recognizes and appreciates the importance of protecting your privacy and securing your personal information. We abide by the Australian Privacy Principles (APPs), a part of the Privacy Amendment (Enhancing Privacy Protection) Act 2012, which amends the Privacy Act 1988.

Laverne Securities Pty Ltd (t/as) Investor Desk will, from time to time, review and update this Policy in accordance with product and service updates and incorporating regulatory, legislative, and technology changes. The Site's Terms of Use govern your use of our services and by using the Site you consent to the collection, transfer, processing, storage, disclosure, and other uses described herein. If you have any questions or concerns regarding this statement, you should contact us at info@investordesk.com.au

2. Collection of personal information

As a financial planning organization, we are subject to certain legislative and regulatory requirements which necessitate us obtaining and holding detailed information which personally identifies you and/or contains information or an opinion about you ("personal information"). In addition, our ability to provide you with a comprehensive financial planning and advice service is dependent on us obtaining certain personal information about you, including:

Laverne Securities Pty Ltd (t/as) Investor Desk collects Personal Information as required by law to verify your identity (in accordance with the AML/CTF Legislation), to allow us to conduct our business functions, and to market our products. Information we may collect includes (but is not limited to):

Your name, date of birth, and contact details (including personal or work email and postal addresses)

- Credit card,
- Bank account

Tax File Number (TFN) and Holder Identification Number (HIN) details

We will not collect any personal information about you except when you have knowingly provided that information to us or authorized a third party to provide that information to us. Generally, the collection of your personal information will be affected in either a face-to-face interview, over the telephone, or by way of an online client engagement form.

3. Collecting Information from third parties

We may also collect Personal Information about you via third parties, such as those that facilitate the use or communication of our products, services, program, or activities (as the case may be) Services. However, we will only collect your personal information from third parties if it is not reasonable or practical to collect this information directly from you.

Click Stream Data

When you visit and browse our website, solution, or app, our website host and other third parties engaged by us may collect personal information for statistical, reporting, and maintenance purposes.

Subject to this Privacy Policy, the personal information collected by our website host will not be used to identify you. The information may include:

- The number of users visiting our website, solution, or app and the number of pages viewed.
- The date, time, and duration of a visit;
- The IP address of your computer; or
- Location of the user;
- The path is taken through our website, solution, or app

Our website host uses this information to administer and improve the performance of our website.

4. How we use the Personal Information

Where we collect Personal information about you, we may use this information for our organization's primary functions and services which may include, but are not limited to:

Provide you with information or services you have requested.

- Promote and market our Services to you;
- Personalize and customize your experiences on our website, solution, or app;
- Communicate with you;
- Provide you with ongoing information about us in which you may be interested;
- Research to improve our existing services or create new services; and
- Allow you to receive emails and other advertising material

If we collect and use your personal information for purposes not listed above, we will make it known to you at

the time we collect and/or use your personal information.

If you choose not to provide your personal information to us for the purposes set out in this privacy policy, we may not be able to undertake certain activities for you.

5. Disclosing your Personal Information

Depending on the nature of your engagement with us, we may disclose your personal information to our related entities or Service partners.

We may also disclose your personal information to our website, solution or app host, software application providers, or infrastructure providers in certain limited circumstances, for example when our website, solution, or app experiences a technical problem or to ensure that it operates effectively and securely, cooperating with law enforcement authorities in the investigation of suspected criminal violations or if there has been a breach of this privacy policy (including in the event of a complaint involving you, gathering information from you and examining your transmissions and materials on services or any networks).

Personal Information will be stored and hosted in Australia.

6. Marketing

We may use your personal information to provide you with promotional material that may benefit you or other services offered by us. If you do not wish to receive such material, we provide you with the ability to unsubscribe from these communications. You can contact our support team at support@investordesk.com.au to request that you be removed from our marketing communication.

Unless otherwise specified in this privacy policy, we will not disclose any of your personal information to any other organization unless the disclosure is required by law or is otherwise permitted by the National Privacy Principles.

7. Access to your Personal Information?

Subject to some exceptions, you are entitled to access personal information that we hold about you. If you request access to your personal information, we must verify your identity before granting your request. Where your request for personal information would unreasonably impact the privacy of others or is not otherwise permitted under the National Privacy Principles, Investor Desk has the right to refuse this request. If we refuse your request to access your personal information, we will provide you with reasons for the refusal.

An access request can be made by contacting our privacy office as specified in section 9.

8. Updating, storage, and security of Personal Information

Additional detailed information regarding the safeguarding of personal information is generally held in your client file. However, we also take reasonable steps to ensure the personal information we collect, use, or disclose is:

- Accurate, completed, and up to date.
- protected from misuse and loss.
- Protected from unauthorized access, modification, or disclosure; and

• Deleted if it is no longer required by Law, for our business purpose or functions.

Updating your Personal Information

Investor Desk provides the facility to update some of your details via your account. However, in some

instances, we will request the update of your details in writing and may also require you to verify your

identity. This is to ensure all requests for updates to personal information is received by the account owner

and to assist in the protection of your personal information.

You may correct, update, or delete/remove your personal information by emailing our Customer Support team

at support@investordesk.com.au We may retain and use your information as necessary to comply with our legal

obligations, resolve disputes and enforce our agreements. Please also note that there might be latency in

deleting information from our servers and backed-up versions might exist after deletion.

9. Concerns regarding your personal information or this privacy policy

If you feel that your privacy has not been respected or that we have conducted ourselves inconsistently with this

privacy policy in respect of your personal information, or for any other queries, or communication about this

privacy policy, please attention your concerns to our Compliance Officer via:

Email:

support@investordesk.com.au

Write to:

Compliance Officer

Suite 6/96 Wigram Street, Harris Park NSW 2150

10. Managing your Complaint

If you make a complaint, Laverne Securities Pty Ltd (t/as) Investor Desk will confirm receipt of your

complaint within 48 hours and will resolve your complaint within 10 working days. However, where this is not

possible, we will contact you within this time frame to provide you with an update and an expected time frame

for the issue to be resolved.

If you are not satisfied with our final response, or if you have not received a response after 45 days, you may

 $complain \ with \ The \ Australian \ Financial \ Complaints \ Authority \ if \ lodged \ on \ or \ after \ 1 \ November \ 2018 \ via:$

Laverne Securities Pty Ltd Member Number: 74676

Online:

www.afca.org.au

Email:

info@afca.org.au

Phone:

1800 931 678 (free call) 1

Mail:

Australian Financial Complaints Authority GPO Box 3, Melbourne VIC 3001

 ${\it Time limits may apply to complain to AFCA and so you should act promptly or otherwise consult the AFCA websites}$

to find out if or when the time limit relevant to your circumstances expires.

11.Amendments		
We may, at any time at our discretion, vary this Privacy Poli	cy by publishing the amended Privacy Policy on our Site.	We
recommend you check our Site regularly to ensure you are	aware of our current Privacy Policy.	
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