# Privacy Policy

Matrix Asset Management (“us”, “we” or “our”) understands that privacy and confidentiality of personal information is very important to our clients (“you”). Matrix Asset Management treats the trust you have in us seriously and is committed to safeguarding the personal and financial details that you provide us.

Matrix Asset Management will collect, hold, use or disclose your personal information that you disclose to us in in a manner consistent with the Privacy Act 1988. Further information on privacy in Australia may be obtained by visiting [www.privacy.gov.au](http://www.privacy.gov.au/).

Matrix Asset Management may also collect information about you for any necessary compliance with the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 or any other legislation and financial service industry regulatory codes and schemes.

**How we collect personal information**

As a client with Matrix Asset Management, we will need to obtain sufficient relevant information about your financial situation to understand your needs and objectives so we can provide you with products and services, provide you with information and marketing material and satisfy certain legislative and regulatory requirements.

Personal information is information that can identify you. Only personal information which is relevant to Matrix Asset Management’s business relationship with you will be collected.

Matrix Asset Management mainly collects personal information directly from you in a number of ways such as:

* during face-to-face meetings;
* when you complete and submit an information or application form;
* through conversations via telephone;
* when you subscribe to one of our publications;
* an email you send us; and
* when you visit our website

Matrix Asset Management may need to collect further personal information about you from third parties, subject to your consent, such as:

* your advisers such as your personal representative, accountant or lawyer; and/or
* other third parties such as fund managers, superannuation funds, life insurance companies and other product providers.

You have the right to refuse to authorise Matrix Asset Management to collect information from a third party.

Cookies

Matrix Asset Management may also collect information through our website using ‘cookies’ which we will use to evaluate the quality of our content and help us to better understand the users of the website and their needs. The information collected in this regard will not be personally identifiable. Examples of this information may include the number of users who visit the site, date and time of visits, number of pages viewed and other user patterns.

Third party information

With respect to any information that you provide to us on behalf of or in relation to another person (such as your spouse, your children, your family member or the name of a referee), it is your responsibility to notify them of your disclosure to us and that they may access their information which is collected by Matrix Asset Management should they require.

Sensitive Information

Except where required by law or where the information is necessary for the establishment, exercise or defence of a legal claim, we will not without your consent, collect information about you that reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs or affiliations, membership of a professional or trade association, membership of a trade union, details of health, disability, sexual orientation, or criminal record.

We will always explain the purpose for collecting sensitive information.

**How we use and disclose your information**

Matrix Asset Management will only use and/or disclose your personal information for the purposes for which it was provided including related purposes in circumstances where one would reasonably expect such use or disclosure.

We may also use your personal information:

* to provide you with relevant financial products, service or information to you in accordance with your requests or reasonable expectations;
* to assess your application and verify your identity in accordance with Anti Money Laundering laws;
* managing and administering the financial product or service;
* for purposes that we reasonably believe to be necessary to give you a product or service that you have requested;
* internally by Matrix Asset Management to perform administrative and operational tasks (such as credit and risk management, developing marketing strategies and assessing customer satisfaction);
* where you have consented to use; or
* where required or authorised by law and to meet our obligations under law.

Further, in the course of conducting our business and/or carrying out our services to you, we may disclose your personal information to the following parties:

* to our contractors and/or service providers under strict confidentiality arrangements;
* your nominated legal and financial advisers;
* counterparties who issue, provide or facilitate products and/or services that you instruct us to acquire or invest in;
* other parties involved in providing, managing or administering your products and/or services including third party suppliers and service providers, our related bodies corporate and our advisers;
* where you have consented to disclosure; or
* where required or authorised by law and to meet our obligations under law.

Where your personal information is disclosed to third parties, we will reasonably seek to ensure that the information is held, used or disclosed consistently with the Privacy Act 1988.

In the event that Matrix Asset Management considers to dispose or sell its business, we may disclose your personal information to bona fide purchasers in order for them to conducting necessary due diligence investigations. Disclosure will be made under strict confidentiality arrangements and on condition that no personal information will be used or disclosed by them without your express consent.

**How to Access and Update Your Personal Information**

We aim to ensure that the personal information we collect, use or disclose is accurate, complete and up-to-date you to ensure that we are able to provide you with the best and most relevant products and services. We will take reasonable steps to make sure this is the case. This way we can provide you with better service. If you are aware that we hold personal information about you that is not or no longer accurate, complete or current, please contact us as soon as possible so that we may promptly update the relevant information that we hold.

You are entitled to access the personal information that we hold about you subject to some exceptions such as where:

* the request for access is an unreasonable or frivolous request;
* access would be unlawful or contravene any laws or regulation;
* the information relates to any existing or anticipated legal proceedings whether or not between you and Matrix Asset Management;
* denying access is required or authorised by law;
* access would prejudice enforcement activities relating to criminal activities and other breaches of law, public revenue, a security function or negotiations with you;
* access would reveal commercially sensitive information or decision-making process; or
* would threaten or have an unreasonable impact on the privacy of others.

If Matrix Asset Management refuses you access to your personal information, we will provide you with a written explanation for that refusal.

We may charge you a reasonable fee for providing access or copies of your personal information. We will disclose any applicable charges to you prior to providing you with the information.

**Links to Other Sites**

You may be able to access third party websites by clicking on links provided on this website. Those third party websites are not subject to our privacy standards, policies and procedures. You will need to contact or review those websites directly to ascertain their privacy standards, policies and procedures.

Matrix Asset Management, its directors, officers, employees or agents  is in no way or form liable for any personal information which you provide within a third party website.

**Marketing Activities**

As part of our service to you, Matrix Asset Management may use your personal information to identify any products or services which you may be interested in. We may contact you periodically to provide you with any new offerings that we may have.

If at any time you no longer want to receive marketing information from Matrix Asset Management, please let us know and we will remove you from the distribution list within 10 business days.

**How we protect your personal information**

To protect your personal information from misuse, loss and unauthorised access, modification or disclosure, Matrix Asset Management will take reasonable steps such as:

* confidentiality requirements for our employees, contractors and service providers;
* document storage security policies;
* security measures for systems access;
* restricting access to personal information to personnel whose identities have been verified; and
* controlled access to our offices and records.

However, none of Matrix Asset Management, its directors, officers, employees, representatives or agents warrants or guarantees the security of your personal information.

We are required by law to keep all personal information and records for a period of 7 years. Should you cease to be our client, we will maintain your personal information on or off site in a secure manner for 7 years after which, the information will be destroyed.

**Changes to Privacy Policy**

We may amend this Privacy Policy from time to time and without notice. If we do so, we will post the amended Privacy Policy on our website ([http://www.matrixam.com.au](http://www.silcgroup.com.au/)).

**Contacting Matrix Asset Management**

If you would like more information, or would like to access, update or amend the personal information that Matrix Asset Management holds about you, [please click here contact us](http://www.silcgroup.com.au/?page_id=13) or at:

Compliance Officer

Matrix Asset Management

2 Queens St, Melbourne VIC 3000 Australia

Matrix Asset Management takes your privacy very seriously. If you believe that we have compromised your privacy, please contact us immediately and we will try to resolve your concerns as soon as possible.

Our aim is to resolve complaints in a timely manner and we will generally resolve a matter within 30 days. However, complex complaints may take longer to resolve. We will use our best endeavours to resolve any complaint to your satisfaction. For further information on how we will handle your complaint, please feel free to request a copy of our Complaints Handling Procedures