

## Privacy policy

Lugarno Partners Pty Ltd

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### General

Lugarno Partners Pty Ltd (**we, us or our**) recognises that your privacy is important and we are committed to protecting the personal information we collect from you. The *Privacy Act 1988* (Cth) (**Privacy Act**), Australian Privacy Principles and registered privacy codes govern the way in which we must manage your personal information. This policy sets out how we collect, use, disclose and otherwise manage your personal information.

### Collection

#### Types of information collected

We may collect and hold personal information about you, that is, information that can identify you and is relevant to providing you with the services and products you are seeking. The kinds of information we typically collect include name, gender, address, phone number, email address, facsimile number, bank account details, tax file numbers or other information relevant to providing you with the services and products you are, or someone else you know, is seeking.

#### Method of collection

Personal information will generally be collected directly from you through the use of any of our standard forms, over the internet, via email, or through a telephone conversation with you. We may also collect personal information about you from third parties acting on your behalf.

There may, however, be some instances where personal information about you will be collected indirectly because it is unreasonable or impracticable to collect personal information directly from you. We will usually notify you about these instances in advance, or where that is not possible, as soon as reasonably practicable after the information has been collected.

#### Purpose of collection

The personal information that we collect and hold about you, depends on your interaction with us. Generally, we collect, use and hold your personal information for the purposes of:

- providing services and products to you or someone else you know;
- providing you with marketing information, including newsletters and emails about other services and products that we offer that may be of interest to you, including future investment opportunities;
- responding to your enquiries;
- facilitating our internal business operations, including the fulfilment of any legal requirements; and
- analysing our services and products with a view to improving those services and products.

## **Failure to provide information**

If the personal information you provide to us is incomplete or inaccurate, we may be unable to provide you, or someone else you know with the services and products you, or they, are seeking.

## **Internet users**

If you access our website, we may collect additional personal information about you in the form of your IP address or domain name. Our website may contain links to other websites. We are not responsible for the privacy practices of linked websites and any linked websites are not subject to our privacy policies and procedures.

Our website uses cookies. The main purpose of cookies is to identify users and to prepare customised web pages for them. Cookies do not identify you personally, but they may link back to a database record about you. We use cookies to monitor usage of our website and to create a personal record of when you visit our website and what page you view so that we may serve you more effectively.

## **Use and disclosure**

Generally, we only use or disclose personal information about you for the purposes for which it was collected (as set out above). We may disclose personal information about you to:

- (a) our related entities to facilitate our and their internal business processes;
- (b) third party service providers who assist us in operating our business (including information technology and marketing service providers) and these service providers may not be required to comply with our privacy policy;
- (c) our related entities and other organisations with whom we have affiliations, so that those organisations may provide you with information about services, products, future investment offers, upcoming projects and various promotions.

We are likely to disclose personal information overseas. For instance, our infrastructure and that of our service providers or other recipients may be based outside Australia, including China and the USA.

In some circumstances, the law may permit or require us to use or disclose personal information for other purposes (for instance where you would reasonably expect us to and the purpose is related to the purpose of collection).

## **Security**

We store your personal information in different ways, including in paper and in electronic form. The security of your personal information is important to us. We take reasonable measures to ensure that your personal information is stored safely to protect it from misuse, loss, unauthorised access, interference, modification or disclosure, including electronic and physical security measures.



## **Access and correction**

You may request access to personal information we hold about you, by making a written request. We will respond to your request within a reasonable period. We may charge you a reasonable fee for processing your request (but not for making a request for access).

We may decline a request for access to personal information in circumstances prescribed by the Privacy Act and if we do, we will provide you with a written notice that sets out the reasons for the refusal (unless it would be unreasonable to provide those reasons).

If, upon receiving access to your personal information, or at any other time, you believe the personal information we hold about you is inaccurate, incomplete or out of date, please notify us immediately. We take reasonable steps to correct the information so that it is accurate, complete and up to date.

If we refuse to correct your personal information, we will provide you with a written notice that sets out the reasons for our refusal (unless it would be unreasonable to provide those reasons) and provide you with a statement regarding the mechanisms available to you to make a complaint.

## **Complaints and feedback**

If you wish to make a complaint about a breach of the Privacy Act, Australian Privacy Principles or a privacy code that applies to us, please contact us as set out below and we will take reasonable steps to investigate the complaint and respond to you. If you are not happy with our response, you may complain directly to the Australian Privacy Commissioner.

If you have any questions or concerns about this privacy policy or the way we handle your personal information, please contact us at:

Street address: Unit 30, Level 2, 11-13 Pearl Street, Kingscliff NSW 2487

Email: [info@lugarnopartners.com.au](mailto:info@lugarnopartners.com.au)

Telephone: 0414 922 742

## **More information**

For more information about privacy in general, you can visit the Australian Privacy Commissioner's website at [www.oaic.gov.au](http://www.oaic.gov.au).

