



Gibbins Advisors Privacy Policy

Gibbins Advisors, LLC and Gibbins Advisors Pty Ltd ('Gibbins Advisors, 'we' or 'our') understands the importance of keeping any personal information we may receive about you secure and confidential.

This privacy policy sets out how Gibbins Advisors collects, uses, manages and discloses personal information and how Gibbins Advisors aims to protect the privacy of your personal information.

Gibbins Advisors may update this policy from time to time.

Personal information

Personal information is information or an opinion, whether true or not and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

Reasons for collecting personal information

Gibbins Advisors collects personal information primarily for the purpose of providing our services and conducting our businesses. This may involve collecting personal information from you to:

- to comply with our obligations under law
- provide advice to you, an associated entity or a third party
- consider an employment application from you
- consider procurement of services from you
- provide you with access to our website and other online services
- provide our publications to you
- respond to queries you submit to us
- provide you with information about our services that may be of interest to you
- administer accounting, billing and other internal administrative services
- comply with our legal requirements under any applicable laws, including anti-money laundering legislation and any other legal requirements which we must comply with which we must comply.

You are not required to provide your personal information to us. However if you choose not to provide personal information to us where requested (or provide inaccurate or incomplete information), we may not be able to provide services to you or in the case of an external administration, deal with your claim.



Gibbins Advisors will use the personal information for the primary purpose and potentially for a permissible secondary purpose where:

- you have consented to that secondary purpose
- it would be reasonably expected to be used for the secondary purpose
- the secondary purpose is related to the primary purpose, or
- otherwise allowed by legislation.

Personal information Gibbins Advisors collects

Gibbins Advisors collects personal information such as a person's name, date of birth, address, telephone number, email address, driver's license details, passport details, tax file number, business number, bank account details, investment information and employment information.

In circumstances limited to prospective employees or employees of corporations subject to external administrations, Gibbins Advisors will collect sensitive information such as membership of a professional or trade association, membership of a trade union or a criminal record. In the case of prospective employees, your photo may be taken.

How Gibbins Advisors collects personal information

Gibbins Advisors collects personal information by lawful and fair means and not in an unreasonably intrusive way. Generally, Gibbins Advisors will collect this personal information directly from you, for example by requesting that you provide the information when you:

- fill out an application form
- submit an online form to us
- enter into an agreement with us
- engage in social media with us
- correspond with us
- subscribe to a distribution list.

In the case of client companies, this information may come into our possession during the normal course of us providing services to our clients.

There may be other occasions when we collect personal information about you or from other sources, such as from a publicly maintained record or from an information services provider, for example where we are required to verify your identity under anti money laundering legislation.

Disclosure of your personal information by Gibbins Advisors

From time to time we may need to disclose your personal information to a third party.

The types of third parties to which we may disclose personal information include:



- your financial, legal or other professional advisers or other persons you have authorized to act on your behalf
- service providers we engage to provide custody, administration, technology, auditing, mailing, printing or other services
- regulatory or government authorities (where required by law)
- our professional advisers (including legal and accounting firms, auditors, consultants and other advisers)
- our related companies.

Some of the recipients to whom Gibbins Advisors may disclose your personal information may be based overseas. Your personal information may be shared for business related purposes with our related entities that are located in the United States of America or Australia.

Except for the above disclosures, Gibbins Advisors will not sell, rent, trade or otherwise supply to third parties any personal information obtained from you unless you consent.

Security of your personal information

Gibbins Advisors takes all reasonable steps to protect the personal information we hold about you from misuse and loss and from unauthorized access, modification or disclosure.

Accessing or changing personal information

You have a right to access or change your personal information that is collected and held by Gibbins Advisors.

If you would like to access or change the personal information Gibbins Advisors holds about you, you can contact Gibbins Advisors and request the relevant change or access. In the first instance, you should contact your Gibbins Advisors contact if you have one. Otherwise, please contact us as outlined below.

To action any change or access request, we will need to verify your identity and comply with our other procedures which are in place to prevent unauthorized access to personal information.

We will take all reasonable steps to provide access or make the changes to your personal information within 30 days from your request.

Gibbins Advisors will not normally charge you any fees or costs for access to your personal information. Fees or costs may apply if providing you with access would require us to incur retrieval or other out of pocket costs. We will notify you if any such fees or costs would be payable.

Privacy complaints

If you have a privacy complaint regarding Gibbins Advisors, you can make a complaint by contacting a Principal of Gibbins Advisors.



Gibbins Advisors will seek to resolve any privacy complaints and will deal with privacy complaints as quickly as possible and in a respectful and confidential manner.

Gibbins Advisors will investigate any privacy complaint you make and will inform you of the outcome of your complaint following the completion of the investigation.

[How to contact us](#)

For further information or inquiries regarding your personal information, please [contact us](#).