

Our Privacy Policy

Our Commitment to Protect your Privacy

Avangard Capital Pty Ltd understands how important it is to protect your personal information. This document sets out our Privacy Policy commitment in respect of personal information that you may provide to us.

We commit that any personal information we collect about you will only be used for the purposes indicated in our policy. It is important to us that you are confident that any personal information we collect from you or is received by us will be treated with appropriate respect ensuring protection of your personal information.

Our commitment in respect of personal information is to abide by the Australian Privacy Principles for the protection of personal information, as set out in the Privacy Act 1988 and any other relevant law.

Personal information collected

We only collect and hold personal information about you that is reasonably necessary for one or more of our business functions or activities, which may include direct marketing. Whenever it is reasonable and practicable to do so, we only collect personal information about you directly from you.

The personal information we collect and hold includes name, contact details, personal details, business details, personal preferences, information about the products and services we have provided and financial information. The personal information we collect and hold may be provided in forms filled out by individuals, face to face meetings, email messages, telephone conversations, or by third parties.

We do not generally collect sensitive information about you. We will only collect sensitive information about you with your consent, unless an exception applies under the APPs. Sensitive information includes information about race, political or religious beliefs, sexual preferences, criminal record and health.

Because of the nature of our business it is impracticable for us to deal with individuals on an anonymous basis or through the use of a pseudonym.

If we receive personal information that we did not solicit, where we determine that we could not have collected that information in accordance with the APPs, we will, where lawful to do so, destroy the information or ensure the information is de-identified.

Use or disclosure of personal information

The personal information we hold is only used or disclosed for the particular purposes for which it is collected. We will not use or disclose any personal information about you for any other purpose without your consent, unless an exception applies under the APPs.

We do not routinely disclose personal information unless:

- disclosure is to service providers or business associates who provide services and financing in connection with our products and services and business functions and activities, which may include:
- your financial adviser or adviser dealer group, their service providers and any joint holder of an investment
- organisations involved in providing, administering or managing our funds, the administrator, custodian or auditors
- organisations providing mailing or printing services
- disclosure is permitted by this privacy policy or the Privacy Act
- you give your consent
- disclosure is otherwise required or permitted by law
- disclosure is to the ATO, AUSTRAC and other government or regulatory bodies
- disclosure is to a related entity or people authorised to act on your behalf.

We may use or disclose personal information about an individual for direct marketing of our products or services, including by email. We will only use personal information for direct marketing where we have collected the information directly from you, and have made you aware that the information may be used for such purpose, or you have consented to use of the information for such purpose. However, individuals may request not to receive direct marketing communications by contacting us.

Quality of personal information

We will take such steps as are reasonable to ensure that personal information we collect is accurate, up to date and complete and that personal information we use or disclose is accurate, up to date, complete and relevant. To assist us with this, you should contact us if any of your personal information changes or if you believe that the personal information we have is not accurate, up to date, complete or relevant.

Security of personal information

We will take reasonable steps to protect personal information we hold from misuse, interference and loss as well as unauthorised access, modification or disclosure. We use current techniques and processes to protect personal information. Where we no longer need personal information for any purpose for which the information may be used or disclosed we will take reasonable steps to destroy the information or ensure the information is de-identified in accordance with the Privacy Act.

Access and correction of personal information

You can access personal information that we hold about you by contacting us. We will give full access to personal information, within a reasonable period after a request is made, unless an exception to access applies under the APPs. We will advise you of any exception that applies. We may charge a reasonable fee for providing access. Where we hold information that you are entitled to access, we will endeavour to provide you with suitable choices as to how to access it (e.g. by mail or email).

If we are satisfied that personal information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading ("faulty information") or you request us to correct the information, we will, within a reasonable period after we identify the faulty information or the request is made, take such steps as are reasonable to correct the information.

Contact us about privacy

You can contact us through the contact details below if you:

- wish to access, update or correct your personal information
- wish to request not to receive direct marketing communications
- require further information about how we handle personal information; or
- have a complaint or concern in relation to privacy.

We will take any issue or concern relating to your privacy matter or complaint seriously and will take all reasonable steps to address your matter or complaint. If you are not satisfied with our handling of your privacy related matter or complaint, you may make a complaint to the Australian Information Commissioner.

Further Information

You may request further information about the way we manage your personal information by writing or emailing.

Company Name:	Avangard Capital Pty Ltd c/o Banxly Investment Group Pty Ltd
Our Address:	Level 21 – 567 Collins Street MELBOURNE VIC 3000
Email Address:	privacy@banxly.com.au
Telephone Number:	1300 991 121

Change in Privacy

We are constantly reviewing our policies and attempt to keep up to date with market expectations. Technology is constantly changing, as is the law and marketplace practices. Therefore, we may change our Privacy Policy as the need arises.

For more information about privacy in general, you can visit the Office of the Privacy Commissioner's web site at www.privacy.gov.au