

Privacy Policy | GLAS Australia

Your privacy is important to us. We are committed to managing personal information you may provide to us in responsible way and in accordance with the Privacy Act 1988, the Australian Privacy Principles and any other legal obligations.

Privacy Notice

This privacy notice sets out how Global Loan Agency Services Australia Pty Ltd, Global Loan Agency Services Australia Nominees Pty Ltd and Global Loan Agency Services Australia Specialist Activities Pty Ltd (GLAS Australia and members of the GLAS Group), also referred to in this privacy notice as “we”, “our” or “us”, collect and use your personal information.

We are committed to being open, transparent and protecting your information; therefore, this notice includes information about how we store and protect your information, who we share your information with and how long we hold your information for. This notice also outlines your rights and the actions you should take if you are concerned with the way GLAS Australia is handling your personal information. Should we ask you to provide certain information by which you can be identified, you can be assured that it will only be used in accordance with this privacy notice.

All members of GLAS Australia are APP entities under the Privacy Act 1988 and are committed to comply with the Australian Privacy Principles. Our Privacy Officer is responsible for ensuring GLAS Australia and its employees comply with the Australian Privacy Principles and is the first point of contact for individuals whose information is held can be contacted at dpo@glas.agency.

References in this notice to “your information” are to personal information that you provide or that is provided to us.

Information held by GLAS Group entities in our international locations is held strictly in accordance with the applicable legislation and legal obligations in each of those jurisdictions.

Why we collect your personal information

GLAS Australia may collect, hold, use or disclose your personal information in order to:

- Verify your identity (as we are required to do under Anti-Money Laundering and Counter Terrorism Financing legislation).
- Provide you with our services.
- Respond to queries, complaints or to provide customer service.

The type of product or service we are providing to you may determine what information we will collect about you.

How we collect your personal information:

- From you directly.

- From external sources, such as:
 - A legal representative
 - A financial adviser/broker
 - An authorised representative, or others who are part of providing your services
 - Information verification service providers.

What type of personal information may be collected by GLAS Australia?

Under Anti-Money Laundering and Counter Terrorism Financing legislation, GLAS Australia is required to 'know its customers' (KYC). This requires GLAS Australia to collect personal information from which your identity is apparent or from which your identity can be reasonably ascertained. This may include:

- Full name (may include marital status)
- Photographic Identification
- Personal business email address
- Telephone Number
- Nationality
- Date of birth
- Gender
- Passport number
- Address and Proof of address
- Bank account details such as sort code/BSB and account number
- Name/s of the executor
- Name/s of the beneficiary
- Details about authorised signatories in connection with facilities managed by us
- Copies of any relevant trust deeds, partnership agreements or constitutions, which may be relevant to comply with Anti-Money Laundering and Counter-Terrorism Financing legislation.

We may also collect personal information about individuals who are business contacts of GLAS Australia.

As part of our recruitment process for employees/contractors we may collect and store personal information about you, including your name, contact details, date of birth, citizenship, employment references, criminal records, bankruptcy records, education and employment history. If you are employed by GLAS Australia we may also hold your tax file number, financial information and bank account details.

How we use your personal information

Generally, we will use and disclose information provided by you for the purpose for which it was collected (or for related purposes which could reasonably be expected) or as otherwise required under an Australian law or a court/tribunal order.

We may use and disclose information provided by you in the following ways:

- To contact you in relation to a transaction/agreement.
- To verify the identity of a customer or potential customers in line with our KYC procedures and the legal requirement to fulfil our obligations under Anti-Money Laundering and Counter Terrorism legislation.
- To prevent fraud or illegal activity.
- To make payments as agent or trustee.
- To deal with any enquiries or complaints.
- For communication purposes including to contact you to offer our services for business purposes, for surveys or questionnaires, or to provide information about our products and services. We respect your rights to ask us not to do this.
- For any additional purpose, where you have provided your consent.

Who we share your personal information with

If the personal information you provide to our transaction managers is for KYC purposes, then your personal information will be securely emailed to our Compliance Team in the UK to process and securely store.

When your name and personal business email address are shared with us in order to send you marketing communications, your name and personal business email address will be shared with our third-party marketing platform, MailChimp. The same information will also be shared with our third-party Customer Relationship Management system (CRM).

Your personal information may be disclosed when we believe in good faith that the disclosure is:

- required by law;
- to protect the safety of our employees, the public or GLAS Group property;
- required to comply with a judicial proceeding, court order or legal process; or
- for the prevention or detection of crime (including fraud, money laundering or terrorism financing); and/or
- with your consent

Storage, Security and Transfer of Personal Information

GLAS Australia takes the security and protection of your personal information very seriously. We have technical and organisational security measures to ensure that your personal information is secure against both external and internal threats and access to personal information is restricted to those who need to process it. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online. GLAS Australia has also established backup and recovery procedures in the unlikely event that your personal information is lost or accidentally destroyed.

Once your personal information has been processed, it will be securely stored in a private portal on Microsoft Office 365 which has restricted access.

Your name and personal business email address will be stored on our third-party CRM system which has access restricted to only those who have a business need to see this information. Our CRM is SOC 2 compliant and maintains reasonable security measures to

protect your information from loss, destruction, misuse, unauthorized access or disclosure. Our CRM complies with the Australian Privacy Principles.

MailChimp's servers are located in the United States so information may be transferred to, stored, or processed in the United States. However, MailChimp participates in and has certified its compliance with standards which comply with the Australian Privacy Principles.

GLAS Australia may transfer your personal information outside Australia. If this happens, we will make sure that suitable safeguards are in place and that your personal information is protected at the same level that it is in Australia.

Email Marketing

We rely on the following legal basis to send email marketing:

- Where it is in our pursuit of legitimate interest to do so
- With your consent

By 'legitimate interests' we mean that we have a business reason to use this information, and it does not conflict unfairly with your interests.

If you have provided us with your business card or email address we will add you to our marketing list. We would like to keep you updated with information about the GLAS Group with regards to products or services that you may be interested in, updates and briefings and invitations to our events. You can unsubscribe at any time.

If you have given consent to receive our marketing emails via our website, we may use your personal corporate email address to email you with the information above.

You can unsubscribe at any time by clicking on the 'unsubscribe' link at the bottom of any email from us or by clicking [here](#)

How long GLAS Australia keeps your personal information for

The above personal information will stay on file for as long as we have reasonable business needs and will retain the personal information in line with legal and regulatory requirements or guidance. Our Anti-Money Laundering and Counter Terrorism Financing (AML/CTF) Program Manual confirms that to ensure compliance with Australian law records of identification are to be retained for 7 years after the account is terminated or a transaction matures. During these 7 years your personal information will be archived securely in Microsoft Office 365 SharePoint.

After this date we will securely delete your personal information and will take steps to ensure that the personal information is erased and cannot be recovered.

Many records may legitimately need to be stored for more than 7 years after receipt. If GLAS Australia still has a relationship with an individual directly, or indirectly through a corporate structure, then we need to maintain the personal information and refresh it where necessary.

We destroy unsolicited personal information not reasonably necessary for one or more of our functions or activities or required by law.

How we use cookies

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity. For further information visit www.aboutcookies.org or www.allaboutcookies.org

When you visit our website we collect certain information via cookies and server logs.

You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browsers. However, in a few cases some of our website features may not function as a result.

Links to other websites

Our website may contain links to other websites of interest. This privacy notice only applies to this website so when you link to other websites you should read their own privacy policies.

Controlling your personal information

You can choose to restrict the use of your personal information. After completing our form on the website, you can tick or leave blank the box that asks if you are happy to receive future marketing communications from the GLAS Group.

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so.

Access to your personal information and correction

Under the Privacy Act you have certain rights to access copies of your own personal information that we hold. Any requests must be made in writing to our Privacy Officer. A response to any such request will be made within a reasonable period after the request is made and access to the information will be given if reasonable and practicable and at a reasonable cost (if any).

If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible. We will promptly correct any information found to be incorrect or engage you in correspondence about why we disagree with you.

Further information or complaints

If you would like any further information about the way we manage your personal information please contact us as follows:

Email: dpo@glas.agency

Mail: GLAS Australia
Level 26, 1 Bligh Street
Sydney, NSW, 2000

If you have a complaint about a breach of this Privacy Policy or the Australia Privacy Principles, please lodge a written complaint addressed to the Privacy Officer (via the contact details above). You will need to provide sufficient details regarding the complaint and any supporting evidence.

We will respond to your complaint within 30 days of its receipt. If you are not satisfied with our determination, or do not receive a response within 30 days, you can contact us to further discuss your concerns, or you may apply to the Office of the Australian Information Commissioner (OAIC) to have your complaint heard and determined. The Commissioner may be contacted on the privacy hotline 1300 363 992 or at oaic.gov.au.

GLAS Australia may revise this Privacy Policy from time to time. A copy of our current Privacy Policy is available:

- To be downloaded from our website: www.glas.agency
- Upon request by contacting us via email: dpo@glas.agency
- Upon request by contacting us via mail:

GLAS Australia
Level 26, 1 Bligh Street
Sydney, NSW, 2000