



## OCEANIA CAPITAL PARTNERS LIMITED

ABN 52 111 554 360

### Privacy Policy

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Approved – 15 June 2005  
Updated October 2009

#### Privacy Act 1988 (the Act)

Oceania Capital Partners Limited (OCP) is subject to the provisions of the Act affecting private sector organisations effective 21 December 2001.

#### What this policy is about?

This policy applies to the management of personal information by OCP in all of its activities and capacities. Under the Act, personal information means information or an opinion about an individual whose identity is apparent or can reasonably be ascertained from the information or opinion.

#### OCP's commitment to privacy

OCP aims to take all reasonable steps to protect the privacy of the personal information it collects.

#### Types of personal information held by OCP

OCP holds personal information relating to shareholders, contractors, job applicants, employees and individuals who deal with OCP in the course of OCP's business activities.

#### Main purposes for which personal information is used by OCP

OCP uses personal information necessary to perform its roles as issuer of shares, employer and investor.

Information about shareholders is used to assess applications for shares, keep proper company records and administer the company. Information about contractors, job applicants and employees is collected to facilitate normal employment functions. Information about individuals involved with OCP's business activities is collected by OCP in order to facilitate the relevant activities.

#### Collection of personal information

Where possible, OCP collects personal information about individuals directly from the relevant individuals. If practicable, OCP provides disclosures as required under the Privacy Act prior to, or at the time of collection. Where this is not practicable, the disclosures are provided as soon as practicable after the time of collection.

Where OCP collects personal information about individuals from sources other than the individual themselves (eg. via OCP's outsourced service providers), OCP takes reasonable steps to ensure that the individual has been made aware of matters covered by disclosures required under the Privacy Act.

## **Disclosure**

OCP informs individuals of the types of parties to whom personal information is disclosed. These include providers of outsourced services, law enforcement bodies, professional advisers and financial institutions involved in processing transactions.

OCP ensures that providers of outsourced services are subject to contractual provisions for the protection of personal information disclosed to them by OCP.

## **Data Security**

Where necessary and appropriate, OCP periodically reviews the personal information that it collects to ensure that it is accurate, complete and up-to-date.

## **Security of personal information**

OCP takes precautions to protect the security of personal information that it holds. In particular, OCP has taken steps to promote physical security, computer security, communications security and personnel security.

## **Access**

Subject to any legal constraints, OCP will provide access to personal information to the individual who is the subject of the information. Persons who wish to obtain such access should direct their requests to the company's Privacy Compliance Officer.

## **Destruction of personal information no longer required**

OCP retains personal information to the extent required to conduct its business and for retention periods required under law. Once the information is no longer required, OCP's policy is that the information should be destroyed.

## **Complaints**

Any person who has a complaint regarding OCP's management of personal information should direct their complaint to the company's Privacy Compliance Officer.

## **Appointment of the Privacy Officer**

The CFO is to be OCP's Privacy Compliance Officer. The responsibilities of this role are:

- management of privacy complaints;
- management of requests for access to personal information;
- review of contracts to ensure privacy is covered in an appropriate manner;
- ensuring that privacy disclosures are given whenever personal information is collected;
- periodic review of the accuracy/appropriateness of databases of personal information; and
- privacy policy review and development as required.

## **Variation of this policy**

OCP may vary this policy at any time.