

Privacy Policy

Australian Impact Investments Pty Ltd

Effective 1 February 2026

1. About us

Australian Impact Investments Pty Ltd (Aii, we, us, our) is based in NSW and provides investment research, recommendations and portfolio advice to wholesale clients. We are a Corporate Authorised Representative (number 464365) of Ethinvest Pty Ltd (ABN 53 003 843 874, AFSL 223718, the Licensee) for certain financial services. This Privacy Policy explains how we manage personal information under the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs), and applies to all interactions with Aii, including website visitors, prospective clients, and business contacts.

2. What is personal information?

Personal information is information about an identified individual, or an individual who is reasonably identifiable.

3. What personal information we collect and hold

We aim to collect only the information we need to deliver our services and meet our legal obligations. Depending on the engagement, we may collect and hold:

- **Identity and contact details**
 - Name, business email, phone, address, role/title, organisation
 - Where required, verification details such as date of birth and identity document details
- **Advice / investment-related information**
 - Investment objectives, risk preferences, portfolio holdings and strategy notes
 - Meeting notes, correspondence, records of recommendations/advice, research usage notes
- **Billing and administration**
 - Invoicing and payment administration information (generally business billing information)
 - Records needed for accounting and audit purposes
- **Online / technical information**
 - Website usage data (cookies/analytics where enabled), IP address and device information
 - Visitors to our website may adjust browser settings to manage cookies

4. How we collect personal information

We collect personal information:

- Directly from you (emails, calls, meetings, forms, engagement letters)
- From your organisation (e.g., trustees, investment office staff) where relevant
- From third parties you authorise (e.g., custodians/brokers) where applicable
- From public sources where relevant (e.g., company websites / registers)

If we receive unsolicited personal information, we handle it in accordance with the Privacy Act, including assessing whether it should be destroyed or de-identified where permitted.

5. Why we collect, use and disclose personal information

We collect, use and disclose personal information to:

- Provide our services (research, recommendations, portfolio advice)
- Manage onboarding, client administration and communications
- Manage invoicing, accounting, audit and business operations
- Manage risk, quality control, and compliance monitoring
- Protect our systems and prevent/respond to cyber incidents
- Respond to complaints, disputes, or legal/regulatory requests

6. Who we disclose personal information to

We may disclose personal information to:

- Service providers that help run our business (IT, cloud hosting, document management, accounting, professional advisers)
- Professional counterparties you authorise us to engage with (e.g., custodians/brokers, accountants) where relevant
- Regulators, courts, or law enforcement where required or authorised by law

6A. Relationship with our Licensee / majority shareholder

Although Ethinvest Pty Ltd is our AFS licensee and majority shareholder, we do not routinely disclose our client records to the Licensee for the Licensee's own business purposes. However, authorised individuals within the Licensee's compliance/risk function may access our records where reasonably necessary for:

- Oversight and monitoring of authorised representative activities
- Audits, incident response, or complaint investigations
- Responding to regulatory requests or other legal obligations

Access is restricted to limited personnel and subject to confidentiality and access controls.

7. Systems we use (and what they may contain)

We use third-party platforms that may store or process personal information, for example:

- Microsoft 365 / Outlook / OneDrive / SharePoint (communications, document storage, collaboration). Data residency is dependent on Microsoft's own work provisioning and service workload, but will likely include overseas data centres.
- Xplan (IRESS) (client/advice records and related documentation). IRESS operates internationally and may involve cross-border access for group operations and support arrangements.
- Xero (accounting, invoicing and financial administration). Xero indicates personal data may be transferred to and processed in other countries due to team locations and data hosting locations.
- DocSend (Dropbox) (secure document sharing and link analytics). We typically use DocSend with limited personal information (often just an email address and access/activity metadata).

8. Overseas disclosures

Some of our providers may store, process, or allow access to personal information outside Australia, depending on configuration and support arrangements.

For example:

- Xero notes transfers/processing may occur in countries such as Australia, New Zealand and the United States.
- DocSend/Dropbox may involve data storage/processing in the United States unless you have a specific data residency configuration.
- IRESS operates across multiple countries and may involve cross-border access within its group and support operations.

Where we disclose personal information overseas, we take reasonable steps to ensure overseas recipients handle personal information in a manner consistent with the APPs (unless an exception applies).

9. Sensitive information

We do not generally seek to collect sensitive information unless necessary for a permitted purpose (e.g., regulatory requirements). If we do, we will handle it in accordance with the Privacy Act.

10. Tax File Numbers (TFNs) and banking information

We do not generally collect TFNs or banking details as part of our current wholesale service.

If we expand services and begin collecting TFNs, we will only do so where authorised and necessary, and we will handle TFN information in accordance with the Privacy (Tax File Number) Rule 2015 (including strict limits on collection, secure storage, restricted access, and proper disposal).

11. Direct marketing

We may send business contacts market updates, research insights or event invitations. You can opt out at any time by contacting us at admin@australianimpactinvestments.com.au or using an unsubscribe option.

12. Security and retention

We take reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, modification or disclosure. Controls may include MFA, role-based access, logging, encryption (where available), staff confidentiality obligations, and vendor due diligence. We provide privacy training and may also restrict access to certain client information depending on the role of an employee or contractor.

We retain personal information only as long as needed for our functions or as required by law, and then securely destroy or de-identify it where appropriate.

13. Data breaches

We maintain procedures to assess and respond to suspected data breaches. Where required, we will notify affected individuals and the OAIC under the Notifiable Data Breaches (NDB) scheme.

14. Access and correction

You may request access to, or correction of, personal information we hold about you. We may need to verify your identity. We will respond within a reasonable time.

15. Complaints

If you have a privacy complaint, contact:

The Privacy Officer
admin@australianimpactinvestments.com.au
The Commons, 121 Castlereagh Street, Sydney NSW 2000

We will acknowledge and aim to respond within 28 days. If you are not satisfied, you can complain to the Office of the Australian Information Commissioner ([OAIC website](#) or 1300 363 992).

16. Updates to this policy

The latest version of this Policy will be published at www.australianimpactinvestments.com.au