LOYALTY ASSET MANAGEMENT

Privacy Policy

Loyalty Asset Management Pty Ltd (ACN 663 236 646)
Corporate Authorised Representative of OTG Capital Pty Ltd
Australian Financial Services Licence 551695

Level 24, Three International Towers
300 Barangaroo Avenue
Sydney NSW 2000

Version 1.0 | August 2026

Version History

Version	Date	Reviewer	Change
1.0	August 2026	A Whelan	New document for Loyalty Asset Management Pty Ltd, adapted from the LFG Financial Services Ltd Privacy Policy v1.1

Review frequency: annual, or earlier if our business or the law changes.

Contents

Our Commitment

Loyalty Asset Management Pty Ltd (LAM) is committed to respecting your privacy and protecting your personal information. We are bound by the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs), together with any other applicable privacy laws and codes, when we collect, use, disclose, hold, handle and transfer personal information. Where it is practical and lawful to do so, you have the option of dealing with us anonymously or by using a pseudonym.

LAM is an asset management business. We construct and manage model portfolios that are made available to investors through financial advisers and investment platform operators. In most cases the investor relationship, and most of the personal information that goes with it, is held by your financial adviser and by the platform operator through which you access our portfolios. The personal information we hold is therefore usually limited. This policy explains what we do hold and how we handle it.

We maintain practices, procedures and systems to ensure that we manage personal information in an open and transparent way. Those practices are described in the policy set out below.

1. In this privacy policy

"We", "our" and "us" means Loyalty Asset Management Pty Ltd (ACN 663 236 646), a Corporate Authorised Representative of OTG Capital Pty Ltd (AFSL 551695). LAM is part of the Loyalty Financial Group.

"Personal information" has the meaning given to it in the Privacy Act: information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information is true or not, and whether it is recorded in a material form or not.

2. The personal information we handle

The information we collect depends on how you deal with us.

Financial advisers, licensees and platform operators. If you are a financial adviser, a representative of an advice licensee, or an employee of a platform operator, research house or other service provider, we typically collect your name, business contact details, employer, role, adviser or representative number, and records of our dealings with you, including meeting notes, correspondence and the material we send you.

Investors in our portfolios. Where you access our portfolios through a platform, the platform operator is the entity that opens and administers your account and collects your identity, tax and financial information. We may receive from the platform operator or from your adviser a limited set of information, which may include your name, account or portfolio number, the holdings and transactions in your portfolio, and the value of your investment. In many cases that information reaches us in aggregated or de-identified form. Where we deal with an investor directly, for example in relation to an enquiry, a complaint, or evidence of wholesale or sophisticated investor status, we may also collect contact details and the information necessary to respond to you.

Website visitors and enquirers. If you contact us through our website, by email or by telephone, we collect your name, contact details and the content of your enquiry. We also collect technical information about your visit, as described in section 16.

Job applicants, employees and contractors. We collect the information necessary to assess an application and to manage an engagement. Acts done in relation to the employee records of our current and former employees are exempt from the Australian Privacy Principles where they relate directly to the employment relationship.

Identification information. Where we provide a designated service under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth), we are required to collect and verify identification information and to keep records of that verification.

3. How we collect personal information

Where it is reasonable and practicable to do so, we collect personal information directly from you. We may also collect it from:

- your financial adviser or advice licensee, where you have authorised them to deal with us on your behalf;
- platform operators, custodians and administrators, through whom you hold your investment;
- publicly available sources, including ASIC registers, the ASIC Financial Advisers Register, company websites and professional networking sites, where we are confirming professional details;
- our website, and the analytics and security tools that support it.

You have the right to refuse us authorisation to collect information about you from a third party, although in some cases this may mean that we cannot deal with you, or with your adviser on your behalf.

We use email and other electronic means to communicate with you. We will never ask you to send us your account passwords or security credentials in this way. If you receive a message that appears to come from us and you are unsure about it, please contact us using the details in section 19.

4. Why we use your personal information

We use personal information for the purpose for which it was collected, for related purposes that you would reasonably expect, and for purposes required or authorised by law. In practice this means:

- constructing, managing and reviewing the model portfolios we make available, including monitoring portfolio performance and risk;
- providing information, reporting and support to financial advisers, licensees and platform operators;
- responding to your enquiries, requests and complaints;
- administering our relationships with platform operators, investment managers and other service providers;
- meeting our obligations under the Corporations Act 2001 (Cth), the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth), our authorisation from OTG Capital Pty Ltd, and the requirements of ASIC, AUSTRAC and other regulators;
- maintaining our records, managing risk, and conducting internal audit, compliance and business improvement activities;
- direct marketing, as described in section 5.

Our investment decisions are made about portfolios, not about individuals. We do not use your personal information to make decisions about your personal circumstances, and we do not provide personal financial product advice. Advice about whether a portfolio suits your circumstances is the responsibility of your financial adviser.

5. Direct marketing

From time to time we may send you information about our portfolios, market and investment commentary, and invitations to briefings and events. This material is directed principally at financial advisers, licensees and platform operators.

If at any time you do not wish to receive this material, you can opt out by using the unsubscribe facility in any message we send, or by contacting us using the details in section 19. We will action your request promptly, and in any event within 5 business days for electronic messages. We maintain a register of individuals who have asked not to receive direct marketing material.

We do not sell personal information, and we do not disclose personal information to other organisations so that they can market to you.

6. When we may disclose your personal information

In line with business practices common to asset managers, and in order to make our portfolios available to you, we may disclose personal information to:

- platform operators, custodians, unit registries, fund administrators and responsible entities, in order to make our portfolios available and to administer them;
- your financial adviser and advice licensee, where you have authorised this;
- OTG Capital Pty Ltd as our licensee, in connection with its supervision of our activities;
- other entities within the Loyalty Financial Group, where necessary for the purposes described in this policy;
- our information technology, cloud hosting, data storage, email and cyber security providers;
- research houses, asset consultants, index and data providers, and investment managers, in connection with portfolio construction and review;
- compliance consultants, external auditors and our professional advisers, including our lawyers and accountants;
- mailing houses, event organisers and marketing service providers;
- a potential purchaser or an organisation involved in a proposed sale of our business, for the purpose of due diligence, corporate reorganisation, or the transfer of all or part of the assets of our business. Any such disclosure will be made in confidence, and it will be a condition of that disclosure that no personal information will be used or disclosed by the recipient for any other purpose;
- a new owner of our business, where the transfer of personal information is required;
- government and regulatory authorities, including ASIC, AUSTRAC, the Australian Taxation Office and the OAIC, as required or authorised by law.

Our employees, contractors and service providers are obliged to respect the confidentiality of any personal information held by LAM.

The Corporations Act gives the Australian Securities and Investments Commission the authority to inspect certain personal information kept on our files. Where we provide a designated service, we are also required to report certain matters to AUSTRAC under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006.

7. Sending information overseas

Some of our service providers, particularly technology, cloud hosting and market data providers, store or process information outside Australia. The countries in which those recipients are likely to be located include the United States, the United Kingdom, member states of the European Union, Singapore and New Zealand.

Before we disclose personal information to an overseas recipient, we take reasonable steps to ensure that the recipient does not breach the Australian Privacy Principles in relation to that information, generally by putting contractual protections in place. If we are required to provide specific personal information to an overseas intermediary in connection with your investment, we will notify you before we do so, unless the disclosure is required or authorised by law.

8. How we store and secure your personal information

We hold personal information electronically in our business systems and, where relevant, in physical files. Access is restricted to authorised personnel who need the information to perform their role. Our systems are protected by measures including access controls, multi-factor authentication, encryption, firewalls and monitoring. Our people are subject to confidentiality obligations and receive privacy and security training.

Personal information is treated as confidential information, and sensitive information is treated as highly confidential.

We are required by law to keep certain records, including records made under the Corporations Act and the Anti-Money Laundering and Counter-Terrorism Financing Act 2006, for a period of 7 years. If you cease to have any dealing with us, we will keep your personal information securely, on site or off site, for the period we are required to retain it. After that, where we no longer need the information for any purpose for which it may be used or disclosed, and we are not required by law or by a court or tribunal order to retain it, we will destroy the information or de-identify it.

9. Data breaches

We maintain a data breach response plan. If we become aware of a data breach that is likely to result in serious harm to any individual whose personal information is involved, we will notify the affected individuals and the Office of the Australian Information Commissioner (OAIC) as required by the Notifiable Data Breaches scheme in Part IIIC of the Privacy Act. Where a breach involves information also held by a platform operator, an adviser or another party, we will work with that party so that the notification obligation is met.

10. Ensuring your personal information is correct

We take all reasonable steps to ensure that the personal information we collect, use and disclose is accurate, complete and up to date. To help us maintain that accuracy, we ask that you:

- inform us of any errors in your personal information; and
- update us with any changes to your personal information as soon as possible.

If you hold your investment through a platform or through a financial adviser, the quickest way to correct your details is usually to update them with your adviser or with the platform operator, who will pass the change on to us.

If you ask us to correct information we hold and we do not agree that it needs correcting, we will tell you why in writing, and you may ask us to associate with the information a statement that you consider it to be inaccurate, out of date, incomplete, irrelevant or misleading.

If you provide inaccurate or incomplete information, we may not be able to deal with you or to provide the services you are seeking.

11. Access to your personal information

You have a right to access the personal information we hold about you, subject to certain exceptions allowed by law. We ask that you make your request in writing, for security reasons, and we will respond within 30 days of receiving it. Before we give you the information, we will need to confirm your identity. Access may be given by:

- providing you with copies;
- providing you with the opportunity for inspection; or
- providing you with a summary.

We do not charge you for making a request for access. If a charge applies to providing access, we will tell you what that charge is before we provide the information.

Some exceptions exist, and we will not provide you with access to your personal information if:

- providing access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety;
- providing access would have an unreasonable impact on the privacy of others;
- the request for access is frivolous or vexatious;
- the information relates to existing or anticipated legal proceedings between us and would not be accessible by the process of discovery in those proceedings;
- providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations;
- providing access would be unlawful;
- denying access is required or authorised by or under an Australian law or a court or tribunal order;
- we have reason to suspect unlawful activity or misconduct of a serious nature, and giving access would prejudice our investigation of the matter;
- providing access would be likely to prejudice an enforcement related activity conducted by or on behalf of an enforcement body.

Should we refuse you access to your personal information, we will provide you with a written explanation for that refusal and tell you how you may complain about it.

12. Using government identifiers

We do not adopt a government identifier, such as a tax file number, Medicare number or driver licence number, as our own identifier for you. Where we are required to collect a government identifier, we do not use or disclose it other than as required or authorised by law, or where you have voluntarily consented to that disclosure. In most cases, identity and tax information for investors in our portfolios is collected by the platform operator rather than by us.

13. Dealing with us anonymously

Where it is lawful and practicable to do so, you can deal with us anonymously or by using a pseudonym, for example if you telephone us requesting our postal address or general information about our portfolios. In most other cases we will need to know who you are before we can respond to you.

14. Your sensitive information

Without your consent, we will not collect information about you that reveals your racial or ethnic origin, political opinions or affiliations, religious or philosophical beliefs, membership of a professional or trade association or a trade union, details of health, disability, sexual orientation or practices, or criminal record.

This is subject to some exceptions, including where:

- collection is required or authorised by law; or
- the information is necessary for the establishment, exercise or defence of a legal claim.

In the ordinary course of our business we have no need to collect sensitive information about investors or advisers.

15. Automated decision making

We do not use computer programs to make decisions about individuals that could reasonably be expected to significantly affect their rights or interests. Our quantitative and systematic investment processes operate on securities, portfolios and market data, not on the personal circumstances of individual investors. A decision about whether one of our portfolios is suitable for you is made by your financial adviser, not by us and not by a computer program.

From 10 December 2026, Australian Privacy Principles 1.7 and 1.8 will require an entity that does use computer programs in this way to set out in its privacy policy the kinds of personal information used, and the kinds of decisions made or substantially informed by those programs. We review our systems against that requirement, and if our processes change we will update this policy before that date.

16. www.loyaltyasset.com.au

Cookies and analytics. Our website uses cookies to provide you with a better user experience and to help us understand how the site is used. Cookies allow us to identify your browser while you are using our site. They do not identify you personally. We may also use analytics services that collect information such as your IP address, browser and device type, the pages you visit and the time you spend on them. If you do not wish to receive cookies, you can instruct your web browser to refuse them, although some parts of the site may then not work as intended.

Enquiries and subscriptions. You may contact us, or register to receive our commentary and other information, through our website. If you do, your name, email address and any other details you provide will be collected and stored on our systems. We take care to ensure that the personal information you give us on our website is protected, including through encryption in transit and appropriate access controls.

Links to other websites. Our website may provide links to third party websites. The use of your information by those sites is not within our control, and we cannot accept responsibility for the conduct of those organisations. Other websites are not subject to our privacy standards, and you will need to review those websites directly to understand their privacy policies.

If you do not wish to receive any further information from us, or you wish to update your registration details, please contact us using the details in section 19. We will action your request promptly.

17. Marketing and electronic messages

Spam is a general term used to describe electronic junk mail, being unwanted messages sent to a person's email account or mobile phone. In Australia, spam is defined in the Spam Act 2003 (Cth) as an unsolicited commercial electronic message. The Australian Communications and Media Authority (ACMA) is responsible for enforcing the Spam Act. Electronic messaging covers email, instant messaging, SMS and other mobile phone messaging. It does not cover ordinary voice to voice communication by telephone.

LAM complies with the Spam Act when sending commercial electronic messages, and applies three requirements:

Consent. Commercial electronic messages are sent only with the recipient's consent, whether express or inferred.

Identification. Our messages include clear and accurate information identifying LAM and the person responsible for sending the message, together with our contact details.

Unsubscribe. Every commercial electronic message we send includes a functional unsubscribe facility, and we deal with unsubscribe requests promptly. The Spam Act provides that consent is withdrawn within 5 working days from the date an unsubscribe request is sent, in the case of an electronic unsubscribe message, or delivered, in the case of a request sent by post or other means.

Where a commercial communication we send includes a facility to forward it to another person, we include a clear recommendation that the recipient should forward it only to people with whom they have a relationship such that those people could be said to have consented to receiving it.

Where the content of a commercial communication promotes or invites interaction with a product, service or event that is age sensitive, we take reasonable steps to ensure that the content is sent only to recipients who are legally entitled to use or participate in that product, service or event.

We also comply with the Do Not Call Register Act 2006 (Cth) in relation to telemarketing calls.

18. Complaints resolution

Please contact our Privacy Officer if you wish to complain about any breach or potential breach of your privacy rights. We will acknowledge your complaint within 7 days, and we will investigate it and respond to you within 30 days. If we need more time, we will tell you why and agree a revised timeframe with you.

If you are not satisfied with the outcome of your complaint, you are entitled to contact the Office of the Australian Information Commissioner:

Write: Office of the Australian Information Commissioner, GPO Box 5218, Sydney NSW 2001

Call: 1300 363 992

Email: enquiries@oaic.gov.au

Online: www.oaic.gov.au

Complaints about spam or telemarketing may also be made to the Australian Communications and Media Authority at www.acma.gov.au.

19. How can I contact Loyalty Asset Management?

Call: 1300 160 136

Email: info@loyaltyasset.com.au

Write: The Privacy Officer, Loyalty Asset Management Pty Ltd, PO Box 1766, Sydney NSW 2001

Office: Level 24, Three International Towers, 300 Barangaroo Avenue, Sydney NSW 2000

20. Changes to this policy

We review this policy at least annually, and we may update it from time to time to reflect changes in our business, our systems or the law. The current version is always available at www.loyaltyasset.com.au. Where a change is significant, we will take reasonable steps to bring it to the attention of the advisers, licensees and platform operators who deal with us.