



PRIVACY & SPAM POLICY

Version 4.0 – June 2026

Purpose

Maven Capital Pty Ltd ("Maven Capital", "we", "us", "our") is committed to protecting the privacy and confidentiality of personal information and complying with our obligations under:

- Privacy Act 1988 (Cth)
- Australian Privacy Principles (APPs)
- Spam Act 2003 (Cth)
- Corporations Act 2001 (Cth)
- Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)
- Other applicable privacy, financial services and cybersecurity legislation.

This Privacy & Spam Policy explains how we collect, use, disclose, store and protect personal information.

Personal Information We Collect

Depending on the services provided, we may collect information including:

Identification Information

- Full name
- Address
- Email address
- Telephone numbers
- Date of birth
- Driver licence details
- Passport details
- Tax File Number (where authorised)

Financial Information

- Assets and liabilities
- Income and expenditure
- Superannuation details

- Investment holdings
- Insurance arrangements
- Banking details

Advice Information

- Financial objectives
- Risk profile
- Retirement goals
- Estate planning information
- Dependants and family circumstances

Sensitive Information

Where reasonably necessary and with consent, we may collect:

- Health information
- Medical history
- Insurance underwriting information

How We Collect Information

We collect personal information:

Directly From You

Through:

- Fact finds
- Application forms
- Authority forms
- Email correspondence
- Telephone discussions
- Meetings
- Website enquiries

From Third Parties

With your consent, we may obtain information from:

- Superannuation funds
 - Product providers
 - Insurance companies
 - Accountants
 - Solicitors
 - Employers
 - Government agencies
 - Other financial advisers
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Why We Collect Personal Information

We collect personal information to:

- Provide financial advice
- Arrange financial products
- Manage client relationships
- Meet legal obligations
- Verify identity
- Conduct AML/CTF checks
- Process transactions
- Manage complaints
- Conduct compliance reviews
- Improve services

Failure to provide requested information may limit our ability to provide services.

Disclosure of Personal Information

We may disclose personal information where reasonably necessary to:

- Superannuation trustees
- Investment managers
- Insurance providers
- Product issuers
- Accountants
- Solicitors
- Auditors
- Compliance consultants
- Corporate Authorised Representatives
- Authorised Representatives
- Responsible Managers
- Information technology providers
- Cloud storage providers
- Document management providers
- Approved artificial intelligence service providers
- Regulators including ASIC, AUSTRAC, AFCA and the OAIC
- Courts and government agencies where required by law

All recipients are expected to maintain appropriate privacy and confidentiality standards.

Overseas Disclosure

Some service providers used by Maven Capital may store or process information outside Australia.

These providers may be located in countries including, but not limited to:

- Australia
- New Zealand
- United States
- United Kingdom
- India
- Singapore

Where overseas disclosure occurs, Maven Capital will take reasonable steps to ensure personal information receives protections substantially similar to those required under Australian privacy laws.

Artificial Intelligence and Emerging Technologies

Maven Capital may utilise approved artificial intelligence (AI) systems and automated technologies to assist with:

- Administrative functions
- Research
- Compliance monitoring
- Document preparation
- Communication drafting
- Operational efficiency

Any use of AI involving personal information is subject to:

- Human oversight
- Confidentiality controls
- Cybersecurity safeguards
- Applicable privacy laws
- Internal governance and risk management procedures

Maven Capital does not rely solely on AI systems when providing personal financial advice.

Data Security

Maven Capital takes reasonable steps to protect personal information from:

- Misuse
- Interference
- Loss
- Unauthorised access

- Modification
- Disclosure

Security measures may include:

- Multi-factor authentication
- Encryption
- Access controls
- Secure cloud infrastructure
- Staff training
- Cybersecurity monitoring
- Password management controls
- Secure document storage

Data Breaches

Maven Capital maintains procedures for identifying, assessing and responding to data breaches.

Where an eligible data breach occurs under the Privacy Act:

- Affected individuals will be notified where required.
- The Office of the Australian Information Commissioner (OAIC) will be notified where required.
- Appropriate remediation measures will be implemented.

Retention of Information

Maven Capital retains records for a minimum of seven years and longer where required by:

- Financial services laws
- Taxation laws
- AML/CTF legislation
- Professional obligations
- Business requirements

When information is no longer required, it will be securely destroyed or de-identified.

Access and Correction

You may request access to personal information we hold about you.

You may also request correction of information that is inaccurate, incomplete or out of date.

Requests should be directed to our Compliance Officer by phone (07) 5507 7721 or compliance@mavencapital.com.au.

We may refuse access where permitted by law and will provide reasons where required.

Website Privacy

Our website may collect information through:

- Contact forms
- Cookies
- Website analytics tools
- Security monitoring tools

Information collected may include:

- IP address
- Browser type
- Device information
- Website usage data

This information is used to improve website functionality, security and user experience.

Users may disable cookies through browser settings.

Marketing Communications

Maven Capital may send information regarding:

- Financial services
- Newsletters
- Regulatory updates
- Educational content
- Business communications

Individuals may opt out of marketing communications at any time.

Unsubscribe requests will be processed promptly.

Spam Compliance

Maven Capital complies with the Spam Act 2003 (Cth).

Commercial electronic messages will only be sent where:

Consent Exists

The recipient has provided express or inferred consent.

Identification Is Clear

Communications clearly identify Maven Capital and provide contact details.

Unsubscribe Facilities Exist

Recipients are provided with a functional unsubscribe mechanism.

Unsubscribe requests will be actioned within the timeframes required by law.

Complaints

All complaints should be directed to:

Compliance Officer

Maven Capital Pty Ltd
PO Box 438
Varsity Lakes QLD 4227

Email: compliance@mavencapital.com.au

Phone: (07) 5507 7721

We will acknowledge complaints promptly and seek to resolve them within 30 days.

If you are dissatisfied with our response, you may contact:

For Privacy Complaints;

Office of the Australian Information Commissioner (OAIC)

[Office of the Australian Information Commissioner](#)

For Financial Services Complaints;

If your complaint is not resolved to your satisfaction within 45 days, you can raise your concerns with the **Australian Financial Complaints Authority (AFCA)** by calling on 1800 931 678 or via their website at www.afca.org.au

Policy Review

This Policy will be reviewed at least annually or sooner where:

- Legislative changes occur;
- Regulatory guidance changes;
- Material business changes occur;
- New technology or cybersecurity risks emerge.

• **Approved By:** Responsible Managers

Owner: Compliance Manager

Review Date: June 2027

Version: 4.0

Spam Act 2003 Viewed 04-06-2026 at www.legislation.gov.au/C2004A01214/latest/text

- Privacy Act 1988 (Cth) – Viewed 04-05-2026 at www.legislation.gov.au/C2004A03712/latest/text
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- Australian Privacy Principles (APPs) Viewed 04-06-2026 at www.oaic.gov.au/privacy/australian-privacy-principles/read-the-australian-privacy-principles
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- Spam Act 2003 (Cth) - Viewed 04-06-2026 at www.legislation.gov.au/C2004A01214/latest/text
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- Corporations Act 2001 (Cth) viewed 04-06-2026 at www.legislation.gov.au/C2004A00818/latest/text
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- Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) viewed 04-06-2026 at www.legislation.gov.au/C2006A00169/latest/text