

# Privacy Policy

As at October 2025



For the purposes of the Privacy Policy (“Policy”), the **Group** (“we”, “us”, “our”) includes the following entities as updated from time to time:

- Zenith Investment Partners Pty Ltd (“Zenith”)
- Zenith CW Pty Ltd (“Chant West”)
- FE fundinfo (Australia) Pty Ltd (“FE fundinfo”)

## Privacy Act 1988 (“the Act”)

The Group is subject to the Australian Privacy Principles (APPs) contained in Schedule 1 of the Act which regulates the manner in which Personal Information is handled by private sector organisations.

## What this Policy is about?

This Policy has been created to provide a clear understanding of how the Group collects, uses, stores, discloses and protects Personal Information in all of its activities and capacities.

Under the Act, “Personal information” is defined as “information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not”.

## When does this Policy apply?

This Policy will apply to you if you access any of the products and services offered by the Group.

By using the Group products and services you agree to the terms of this Policy and consent to the collection, use and holding of your Personal Information in accordance with this Policy.

You may withdraw your consent for collection, use and holding of your Personal Information at any time by discontinuing use of the products and services offered by the Group and/ or contacting the Privacy Officer. The Privacy Officer’s contact details are located at the end of this Policy.

## The Group’s commitment to privacy

The Group aims to take all reasonable steps to protect the privacy of the Personal Information it collects. Maintaining the privacy of our clients is very important to us and we recognise clients will want to know how we deal with the Personal Information we collect about them. This Policy sets out our approach to protecting the privacy of all our clients and contacts in accordance with the Act. We are happy to answer questions at any time.



## What type of Personal Information do we collect and hold?

We will only collect Personal Information or otherwise, for business related purposes that we believe to be relevant and required to provide financial services to our clients (where appropriate) and to the conduct of our business.

The type of Personal Information that we collect, and hold may include the following:

- If you access our products and services, we may collect your name, address, contact details, and if you are required to make payment, credit card information as well as information about your use of our products. We may also collect information such as your age, gender or information in relation to your financial products, if this information is provided by you, to assist with tailoring your use of our tools and products.
- In some cases, our products/ tools (e.g. AppleCheck) may collect additional Personal Information such as smoking status, superannuation fund balance, profession, and salary details. Use of the product/ tools may require this information to optimise the comparison of applicable superannuation and pension funds based on the information provided.
- If the organisation you work for uses any products offered by the Group, we may collect your name, email address and that you are employed by the organisation accessing the products. We may also collect information regarding use of the products and provide that information to your organisation.
- In cases where our products are being provided through a third party, that third party may provide us with Personal Information about you. If you contact us by phone or email or by completing a survey or providing feedback, we may collect your name, email address and other contact information provided by you. Where possible we will generally avoid collecting and holding personal information unless it is necessary to provide you with financial services.
- Where you apply for a position within the Group, or are employed by the Group, we may collect Personal Information about you including your name, contact details and any other information required for the purposes of your recruitment, hiring, employment or contract management.
- We do not manage any surveillance within our premises, with the exception of our data cupboards which may be under video surveillance for the purpose of security. As such, your Personal Information may be collected when accessing these cupboards.

We will not collect or hold Sensitive Information (as defined in the Act) about you (i.e. details about race, religion or political beliefs).

Due to the nature of our business and the services we provide we are unable to offer our services to clients on an anonymous basis or under a pseudonym.



## How do we collect Personal Information?

In the general conduct of our business we may be required to collect, hold and use Personal Information. We will generally collect such Personal Information from you directly in person, through telephone conversations, written correspondence, through our Websites when you log in, or through an authorised third party. Where required we may also obtain Personal Information from third parties including public registers, regulatory authorities and/ or credit reporting providers.

For specific products/ tools, information may be collected from referring superannuation funds and is also collected through the information provided by you using the product/ tool.

## Why do we need Personal Information?

We primarily collect various types of personal contact information in order to register users to use the Group websites ("Websites"). We use this information to administer client accounts in accordance with their instructions, and to provide them with a particular product or service.

We need a certain amount of Personal Information regarding our business or corporate contacts in order to conduct our business effectively and efficiently. We will use client information to provide customisations, product improvement and better customer services and products. Where applicable, we may also use the information collected to contact you about new or existing products or to respond to your questions and comments if you contact us.

Where a superannuation fund has our product/ tool accessible on their website, we gather information necessary to provide the service of the product/ tool which is to compare superannuation or pension funds.

If you do not want to be contacted by the Group, you may withdraw your consent to be contacted by notifying the Privacy Officer.

## Do we give Personal Information to any other person or organisation?

Other than as set out in this Policy, the Group generally does not provide Personal Information to any other person or organisation locally or internationally and we do not sell, rent or trade Personal Information to third parties. All Group companies and our staff with permitted access to client information are specifically required to observe our confidentiality obligations and the obligations under this Policy.

Personal Information is also disclosed to FE Fundinfo Limited ("Parent Entity") who are primarily based in the United Kingdom for the purposes of integrating and centralising business data. Any Personal Information disclosed to our Parent Entity will not be used in any other way than for the purposes it was originally collected. Personal Information collected by the Group is stored in the United Kingdom.



Personal Information collected by us may also be disclosed to external service providers who are contracted to carry out specialised services (including but not limited to IT service providers who may be located outside of Australia, i.e. the Philippines). If Personal Information is disclosed to external service providers, they are required to comply with their obligations under applicable privacy laws and are only authorised to use the Personal Information in order to provide the services required by the Group.

Personal Information may also be provided to relevant superannuation funds who use our products/ tools (e.g. AppleCheck). Personal Information provided is limited to information provided by you in using our products/ tools and may only be shared with superannuation funds if you accept the Group Terms and Conditions ("T&C's") prior to the products/ tools being accessed. Where Personal Information is disclosed to relevant superannuation funds they are required to comply with their obligations under applicable privacy laws and in line with the T&C's.

We may be required to disclose your Personal Information to the organisation you work for if they have purchased financial products or services from the Group.

We may be required, from time to time, to disclose client information to Governmental or judicial bodies or agencies or our regulators, but we will only do so under proper authority. We will not disclose client information to any external organisation unless we have client consent or are required by law or have previously informed the client.

## Security of Personal Information

We have various policies and procedures that are designed to ensure that the Personal Information we collect remains confidential and secure, both in paper and electronic environments. We maintain strict security systems designed to prevent unauthorised access to client information by anyone, including unauthorised staff. However, whilst we are committed to protecting the Personal Information and privacy of users on our Websites, we cannot guarantee the security of any information disclosed online. If at any time you are concerned about sending information over the internet, you may contact us by telephone or post. We further note that any links to third party websites that are not operated or controlled by us have been inserted for your convenience only. Use of such websites or any other third-party websites, in general, are not covered by this Policy and we recommend you review their relevant privacy policy before supplying any Personal Information.

## Internet Site Privacy

The Group Websites may use technology to monitor traffic through the site, but this is done without collecting Personal Information.

When you access the Group Websites we may record your server address, along with when you accessed the Website. We are also able to access general information regarding the pages and documents you reviewed and/ or downloaded.

The Group uses cookies and similar technologies, such as tags and pixels ("Cookies"), to personalise and improve your customer experience as you use the Websites. This section provides more



information about Cookies, including how we use them and how you can exercise your choices about our use of Cookies.

## How we use Cookies

Cookies are small text files containing a unique identifier, which are stored on your computer or mobile device so that your device can be recognised when you are using a particular website or mobile app. They can be used only for the duration of your visit or they can be used to measure how you interact with services and content over time. Cookies help to provide important features and functionality on our Website and are used to improve your customer experience.

You may set up your internet browsers to reject Cookies and/ or notify you when they are being used but note that this may affect the usage of the services we provide.

When you access our Websites to use our services, you are consenting to the use of Cookies which may be used to do the following:

### Improve the way our Websites are used

Cookies allow us to improve the way our Websites and web app works so that we can personalise your experience and allow you to utilise many of its useful features.

### Improve the performance of our Websites

Cookies can help us to understand how our Websites are being used, for example, by telling us if you get an error message as you browse.

This information is used where relevant in servicing our clients and in the conduct of our business in general and is not disclosed.

## Accessing your Personal Information?

Privacy laws such as the Act give a right of access to the Personal Information we hold, subject to exceptions allowed by law. The Group will provide access to Personal Information to the individual who is the subject of the information. Clients and contacts can request to inspect and copy this information, and ask us to update or correct it by contacting the Privacy Officer.

## Retention

Under relevant laws such as the Act, the Group is required to hold certain Personal Information for appropriate periods of time. Where we are no longer required to retain the Personal Information and it is no longer reasonably necessary for a business related purpose that we believe to be relevant and required to provide financial services to our clients (where appropriate), or to the conduct of our business, the Group will take reasonable steps to destroy or de-identify it in accordance with the Act.



## Complaints

Any complaints about the information we have collected and/ or how we have handled, used or disclosed such information should be directed to our Privacy Officer, who will contact you within 5 business days after receiving your complaint to discuss the complaint and work with you towards a resolution.

If a resolution is not achieved in the first instance, we will take steps to conduct a thorough investigation of the matter. Investigation of complaints may take up to 30 days (longer for complex matters), requiring you to provide us with as much detailed information and supporting documentation as possible, in relation to the matter. Once we have finalised our investigation, we will organise to meet with you to discuss findings and the proposed resolution.

If you are not satisfied with the outcome of our investigation and/ or resolution, you may refer your complaint to the [Office of Australian Information Commissioner](#).

## Policy Updates

The Group may update this Policy from time to time to ensure that it remains current and reflects regulatory and statutory obligations. A current and updated version of this Policy will be posted on our Websites and a copy may be obtained by request from our Privacy Officer.

## Privacy Officer Contact Details

**Telephone:** +61 3 9642 3320

**Email:** [legal@zenithpartners.com.au](mailto:legal@zenithpartners.com.au)

**Or write to:**

*The Privacy Officer  
Level 22, South at Queen & Collins Tower  
376-390 Collins Street  
Melbourne VIC 3000*

| Version | Date of review | Review completed by                |
|---------|----------------|------------------------------------|
| V1      | August 2022    | Head of Legal & Compliance         |
| V2      | March 2023     | Legal Counsel & Compliance Officer |
| V3      | February 2024  | Legal Counsel & Compliance Officer |
| V4      | August 2024    | Legal Counsel & Compliance Officer |
| V5      | October 2025   | Legal Counsel & Compliance Officer |

Issued by Zenith Investment Partners Pty Ltd (ABN 27 103 132 672) Australian Financial Services Licence (AFSL) Number 226872 on behalf of the Group, October 2025.