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Best Execution Policy

Share Trading is a service provided by Australian Investment Exchange Ltd (the Participant, we, us, our) ABN 71 076 515 930 AFSL 241400, a participant of the ASX Group and Chi-X Australia.

As a market participant, Australian Investment Exchange Limited has an obligation to obtain the best outcome for its clients when handling and executing client orders, the Best Execution Obligation. This disclosure sets out how the Participant meets its Best Execution Obligation.

The Participant will take all reasonable steps to obtain the best possible outcome for its clients. Best outcome means different things for different clients. For retail clients best outcome will mean best total consideration – in other words, the purchase or sale price after brokerage and GST. If you are a retail client, this will mean that the Participant will always attempt to obtain the best total consideration for your order unless you instruct us otherwise.

For wholesale clients, best execution will include price, costs, speed and likelihood of execution and any other relevant order consideration. The Participant will generally give price a higher relative importance when obtaining the best outcome but may also take into consideration and give priority to a range of different factors, including the requirement for timely execution, the liquidity of the market, potential price impact and the size of the order.

For both retail and wholesale client orders, we will choose a venue or venues that satisfy our Best Execution Obligation.

Execution venues considered by the Participant when executing orders are ASX TradeMatch, ASX CentrePoint and Chi-X Australia. At present due to limited liquidity, the Participant will not send orders to the ASX PureMatch order book. Where part or all of an order does not trade immediately, the remainder of that order will be sent to one of the available execution venues. During the opening and closing phases of the trading day, the Participant will send orders to participate in the ASX TradeMatch opening and closing auctions. The closing price of a security will be determined by the ASX TradeMatch closing price. When an execution venue is unavailable (for example, due to a market outage, differing trading hours for trading venues or outside of trading hours), the Participant may execute existing and new orders on any remaining open execution venues provided we believe that our Best Execution Obligation can be achieved in taking this action.

Your orders can be executed via different methods including by an automated order processing system or by human intervention. Your orders will be treated in accordance with the relevant Market Operating Rules and ASIC Market Integrity Rules.

Where we receive specific instructions from you, we will take reasonable steps to execute those instructions, even though they may not achieve the best outcome for you, provided they do not conflict with other obligations under the Corporations Act, ASIC Market Integrity Rules or other relevant laws. Wholesale clients may provide standing instructions or execution requirements which can include instructions to opt-out of our Best Execution procedures.

On receipt of a reasonable request by a client we will provide the client with evidence that the order has been executed in accordance with our policies and procedures. On receipt of a request we will advise the client of the estimated time to provide the necessary information.

The Participant will periodically review and monitor its Best Execution procedures, practices and connections to alternate trading venues. We will annually review any opt-out or standard instructions received from a wholesale client.



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Important Information

IMPORTANT INFORMATION

- 1. Australian Investment Exchange Ltd ABN 71 076 515 930 AFSL 241400 (the Participant, we, us, our) is a participant of the ASX Group and Chi-X Australia.
- The Participant is not authorised to carry on business in any other jurisdiction other than Australia. Accordingly, the information contained in this Internet site is directed to and available for Australian residents only.
- Investment in securities and derivatives involves risk. Share prices rise and fall. The payment of dividends and the return of capital are not guaranteed. Past performance is not indicative of future performance.
- 4. The information on this site has been prepared without taking account of the objectives, financial situation or needs of any particular individual. For this reason, any individual should, before acting on the information on this website, consider the appropriateness of the information, having regard to the individual's objectives, financial situation and needs and, if necessary, seek appropriate professional advice.

You should also read our Financial Services Guide (FSG), which provides you with information about us and services we can provide. In addition, you should read all relevant Product Disclosure Statements or disclosure documents. You can access the FSG from this website.

- 5. The Participant tries to ensure that the information provided is complete and correct but readers are advised to check any important item(s) with us before making any decisions.
- The Participant is a wholly owned but not guaranteed subsidiary of the Commonwealth Bank of Australia ABN 48 123 123 124 AFSL 234945. Commonwealth Bank of Australia and its subsidiaries do not guarantee the obligations or performance of the Participant or the products or services it offers.
- 7. The Accelerator Cash Account and Term Deposit are products of the Commonwealth Bank of Australia administered by the Participant. The Commonwealth Bank is a signatory to the revised Code of Banking Practice. Information about the Code of Banking Practice is available from www.commbank.com.au



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Privacy Policy

This privacy policy is provided by Australian Investment Exchange Limited ABN 71 076 515 930 AFSL 241400 of Ground Floor, Tower 1, 201 Sussex Street, Sydney, NSW, 2000 (Ausiex).

1. YOUR PRIVACY IS IMPORTANT TO US

We know that how we collect, use, exchange and protect your information is important to you and we value your trust. That's why protecting your information and being clear about what we do with it is a vital part of our relationship with you.

Please note that during the course of our relationship with you, we may tell you more about how we handle your information. This could be when you complete an application or receive terms and conditions or a Product Disclosure Statement. When you receive this further information, please consider it carefully and visit our website regularly as we update this policy from time to time.

2. INFORMATION WE COLLECT

Information we collect from you

We collect information about you and your interactions with us, for example when you request or use our products or services, transfer money, phone us or visit any of our websites. When you use our website or mobile applications we may collect information about your location or activity including IP address, telephone number and whether you've accessed third party sites. Some of this website information we collect using 'cookies'.

The information we collect from you may include your identity and contact details, other personal details such as gender and marital status and financial information.

Information we collect from others

We collect information about you from others, such as service providers, agents, advisers or brokers. We may collect information about you that is publicly available, for example from public registers or social media, or made available by third parties.

Sensitive information

The Privacy Act also protects your sensitive information, if we need to obtain this type of information, we will ask for your consent (except where otherwise permitted by law).

3. HOW DO WE USE YOUR INFORMATION?

We collect, use and exchange your information so that we can:

- establish your identity and assess applications for products and services
- price and design our products and services
- · administer our products and services
- manage our relationship with you
- manage our risks and help identify and investigate illegal activity, such as fraud
- contact you, for example if we suspect fraud on your account or need to tell you something important
- conduct and improve our businesses and improve the customer experience
- comply with our legal obligations and assist government and law enforcement agencies or regulators
- identify and tell you about other products or services that we think may be of interest to you.

We may also collect, use and exchange your information in other ways where permitted by law.

Direct marketing

If you don't want to receive direct marketing, you can tell us by contacting us using the details provided in the header of this policy.

Gathering and combining data to get insights

Improvements in technology enable organisations, like us, to collect and use information to get a more integrated view of customers and provide better products and services.

We may combine customer information we have with information available from a wide variety of external sources (for example census or Australian Bureau of Statistics data). This allows us to analyse the data in order to gain useful insights which can be used for any of the purposes mentioned earlier in this section.

In addition, we may provide data insights or related reports to others, for example to help them understand their customers better. These are based on aggregated information and do not contain any information that identifies you.

4. WHO DO WE EXCHANGE YOUR INFORMATION WITH?

We exchange your information with our related entities and certain third parties so that we may adopt an integrated approach to our customers. We may use this information for any of the purposes mentioned in section 3

Third parties

We may exchange your information with third parties where this is permitted by law or for any of the purposes mentioned in section 3.

Third parties include:

- service providers and those who refer business to us
- co-branding or branding partners (organisations with whom we have agreements to provide products and services under a different brand name)
- those to whom we outsource certain functions, for example, direct marketing, statement production, debt recovery and information technology support
- brokers, agents and advisers, and their service providers, and persons acting on your behalf, for example guardians and persons holding power of attorney
- market operators, operators of clearing and settlements facilities, share and other registries
- issuers of financial products and platform providers
- other financial institutions, for example so that we can process a claim for mistaken payment
- auditors, insurers and re-insurers
- employers or former employers
- government and law enforcement agencies or regulators
- entities established to help identify illegal activities and prevent fraud.

Under 16s and special needs

If you are under 16 or have special needs, we may share your information with your parent or legal guardian or any person appointed to manage your affairs.

Sending information overseas

From time to time we may send your information overseas, including to our related entities, service providers or other third parties who operate or hold data outside Australia. Where we do this, we make sure that appropriate data handling and security arrangements are in place. Please note that Australian law may not apply to some of these entities.

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We may also send information overseas to complete a particular transaction, such as an International Money Transfer, or where this is required by laws and regulations of Australia or another country.

We currently don't send your information overseas, if this changes we will update this policy to include details of countries to which information may be sent.

5. KEEPING YOUR INFORMATION SECURE

We keep your hard-copy or electronic records on our premises and systems or offsite using trusted third parties. Our security safeguards include:

Security Safeguard	Details
Staff education	We train and remind our staff of their obligations with regard to your information.
Taking precautions with overseas transfers and third parties	When we send information overseas or use third parties that handle or store data, we ensure that appropriate data handling and security arrangements are in place.
System security	When you transact with us on the internet via our website or mobile apps we encrypt data sent from your computer to our systems.
	We have firewalls, intrusion detection systems and virus scanning tools to protect against unauthorised persons and viruses accessing our systems.
	When we send electronic data we use dedicated secure networks or encryption.
	We limit access by requiring use of passwords and/or smartcards.
Building security	We have protection in our buildings against unauthorised access such as alarms, cameras and guards (as required).
Destroying data when no longer required	Where practical, we keep information only for as long as required (for example, to meet legal requirements or our internal needs).

6. ACCESSING, UPDATING AND CORRECTING YOUR INFORMATION

Can I get access to my information?

You can ask for access your basic information (for example what transactions you've made) by going online or phoning us using the details provided in the header of this policy.

For more substantial information you will need to contact Customer Relations using the details in section 8.

Is there a fee?

There is no fee for making the initial request, but in some cases there may be an access charge to cover the time we spend locating, compiling and explaining the information you ask for. If there is an access charge, we'll give you an estimate upfront and confirm that you'd like us to proceed. Generally, the access charge is based on an hourly rate plus any photocopying costs or other out-of-pocket expenses. You'll need to make the payment before we start, unless you've authorised us to debit your account.

How long does it take to gain access to my information?

We try to make your information available within 30 days of your request. Before we give you the information, we'll need to confirm your identity.

Can you deny or limit my request for access?

In certain circumstances we're allowed to deny your request, or limit the access we provide. For example we might not provide you access to commercially sensitive information. Whatever the outcome, we'll write to you explaining our decision.

Updating your basic information

It's important that we have your correct details such as your current address and telephone number. You can check or update your information by going online or phoning us using the details provided in the header of this policy.

Can I correct my information?

You can ask us to correct any inaccurate information we hold or have provided to others by contacting us using the details in section 8. If the information that is corrected is information we have provided to others, you can ask us to notify them of the correction. We don't charge a fee for these requests.

If we're able to correct your information, we'll inform you when the process is complete.

What if we disagree that the information should be corrected?

If we disagree with you that information should be corrected, we'll let you know in writing our reasons. You can ask us to include a statement with the relevant information, indicating your view that the information is inaccurate, misleading, incomplete, irrelevant or out-of-date. We will take reasonable steps to comply with such a request.

7. MAKING A PRIVACY COMPLAINT

We're here to help

We accept that sometimes we can get things wrong. If you have a concern about your privacy you have a right to make a complaint and we'll do everything we can to put matters right.

How do I make a complaint?

To lodge a complaint, please get in touch with us using the details set out in section 8. We'll review your situation and try to resolve it straight away. If you have raised the matter through your point of contact and it has not been resolved to your satisfaction, please contact our Customer Relations team using the details in in section 8.

How do we handle a complaint?

We acknowledge every complaint we receive and provide our name, a reference number and contact details of the investigating officer. We keep you updated on the progress we're making towards fixing the problem.

Usually, it takes only a few days to resolve a complaint. However, if we're unable to provide a final response within 45 days we'll contact you to explain why and discuss a timeframe to resolve the complaint.

External Review

If you're not satisfied with our handling of your matter, you can refer your complaint to external dispute resolution. We suggest you do this only once you've first followed our internal complaint processes set out above.

The Financial Ombudsmen Service (FOS) offers a free and independent dispute resolution service for the Australian banking, insurance and investment industries. You can contact FOS on 1300 780 808, online at <u>www.fos.org.au</u> or write to Financial Ombudsman Service, GPO Box 3, Melbourne, VIC 3001.

If your complaint is about the way we handle your personal information, you may also contact the Office of the Australian Information Commissioner on 1300 363 992, online at <u>www.oaic.gov.au</u> or write to the Office of the Australian Information Commissioner, GPO Box 5218, Sydney NSW 2001.

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8. HOW TO CONTACT US OR FIND OUT MORE

For privacy related queries, access or correction requests, or complaints, or to request not to receive direct marketing, or to request a printed version of this policy please contact us on the details provided in the header of this policy as we aim to resolve your query or complaint at your first point of contact with us.

If you have tried to resolve your query through your usual point of contact or customer service team and are not satisfied with the outcome, you can also contact our Customer Relations team directly by calling 1800 805 605 between 8.30 am - 6.00 pm (Sydney/Melbourne time) Monday - Friday, or fax on 1800 028 542, or write to Customer Relations, Reply Paid 41, Sydney NSW 2001.