

Trusted experts,  
committed to  
your success

**River IM Privacy Policy**

Last Updated: 16 March 2023



# Privacy Policy

River Investment Management Pty Ltd ABN 44 601 472 753 is a corporate authorized representative (CAR) 001301361 of Rivkin Securities ABN 87 123 290 602. The purpose of this document is to outline how River IM collects and maintains your personal information. It also states how this information is used, updated, and made available to those parties eligible to access it. Any reference to "River", "we", "us" or "our" refers to River Investment Management Pty Ltd.

This Privacy Policy may be updated from time to time, as changes to our operational and corporate structure are made. This Privacy Policy is written and enforced in accordance with the Australian Privacy Principles contained in the Commonwealth Privacy Act 1988.

## Overview

River IM will be provided with personal information when a user accesses any River website or attempts to contact River electronically, in person, by phone or by post. If you are providing information about someone other than yourself, you are guaranteeing River that the person in question has been informed of the information being provided and has access to this Privacy Policy.

River IM will maintain, update, and add to your personal information whenever contact is made electronically, in person, by phone or by post, by you or by River IM.

## What personal information do we collect?

At River IM, we use your information to provide our services to you, establish and manage your account, and comply with the law. We may also use your personal information to monitor and improve the services we offer you. When you visit a River IM website, our web applications may record your IP address, the date, time and duration of your visit, the web site from which you visit us, the type of computer software used to access our site as well as the web pages you visit or documents you download.

Additionally River IM may place a pixel on pages on our site, or those of other companies that are presenting advertisements. This enables us to record in our server logs that a specific user id has visited a particular page. This data allows us to analyse and determine our audience's behavioural characteristics, which helps us to optimise our site, advertisement placement, and communication focus. Only anonymous, non-personally identifiable information is collected, and it cannot be tracked to a specific individual.

We also collect any personal information that you submit to us via electronic or non-electronic means, as required for legal and operational use.

If further information is required, River IM may use third-party sources, such as the ASIC Company Names database to verify ACN or ABN details, for instance.

## **How do we collect and store your personal information?**

We track website visitors using cookies, which are electronic tokens containing small amounts of information that are passed between a web browser and a web server. They are used to maintain session state between pages or to retain information between visits if you return to the website later.

We use cookies to correlate passive activity tracking data as well as to authenticate supply of information such as enquiries, comments, and votes to minimise malicious or spam traffic.

In some cases, we serve advertisements that lead to a River IM website. Our web advertising partners, who include Google, may place or recognise a unique cookie on your browser. For more information about Google and display advertising features, and how to opt-out of its tracking methods, please

[click here](#). All information submitted by you using electronic or non-electronic means may be recorded using our telephone system, network server, customer relationship management database or web server. Where external parties are used to maintain data (such as website hosting companies or financial auditing firms), your information may be stored by a company other than River IM.

## **Who can access my personal information?**

River IM may disclose your information to its employees, agents and affiliates inside or outside your country of residence for the purpose of providing services to River IM. Our employees, agents, affiliates and third party providers who have access to personal data obtained through River IM websites are obliged to respect privacy. We may also disclose your information to governmental agencies or entities, regulatory authorities, or other persons in line with applicable rules, orders, subpoenas, official requests, or similar processes as either required or permitted by applicable law.

## **Accessing your personal information**

You have the right (excluding exceptions outlined in the Privacy Act) to seek access to and update or correct the personal information we hold about you. If you make an access request, we will ask you to

verify your identity. We may charge a fee to cover the costs of meeting your request.

## Call recording

River IM may record incoming and outgoing telephone conversations for training or quality purposes. If you do not want your call recorded, please advise a River IM employee at the beginning of your conversation.

## Data Breach

In the event of an eligible data breach (unauthorised access or unauthorised disclosure) of client records and/or information, River IM endeavours to contact the affected parties as soon as practicable to alert them to the circumstances of the event and the likely impact of the occasion.

## Consent

By accessing our website, contacting River IM or by submitting an application to become a River IM client, you consent to River IM collecting, maintaining, using and disclosing personal information about you and provided by you or by another person as described above.

## How to contact us

If you have any questions or complaints about how we collect, use, disclose, manage or store your personal information, or would like to request access or changes to the information we hold, please contact us by telephone on +61 2 9360 3650, email [concerns@rivkin.com.au](mailto:concerns@rivkin.com.au), or in writing at:

CLIENT ENQUIRES

PO Box 1524

Double Bay NSW 1360

Rivkin Securities Pty Ltd

ACN 123 290 602, AFSL 332802

8/1 Kings Cross Road, Rushcutters Bay NSW 2011

T: +61 2 8302 3650, F: +61 2 8302 3601 [www.rivkin.com.au](http://www.rivkin.com.au)

**Any deviation from this policy may result in disciplinary action, up to and including to termination of employment/contract.**

River Investment Management (ABN 44 601 472 753) is a Corporate Authorised Representative 001301361 of Rivkin Securities Pty Ltd (ABN 87 123 290 602; AFSL No. 332802) and provides financial advice under the Rivkin Securities AFSL.

Rivkin Securities Pty Ltd

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Rushcutters Bay, New South Wales 2011

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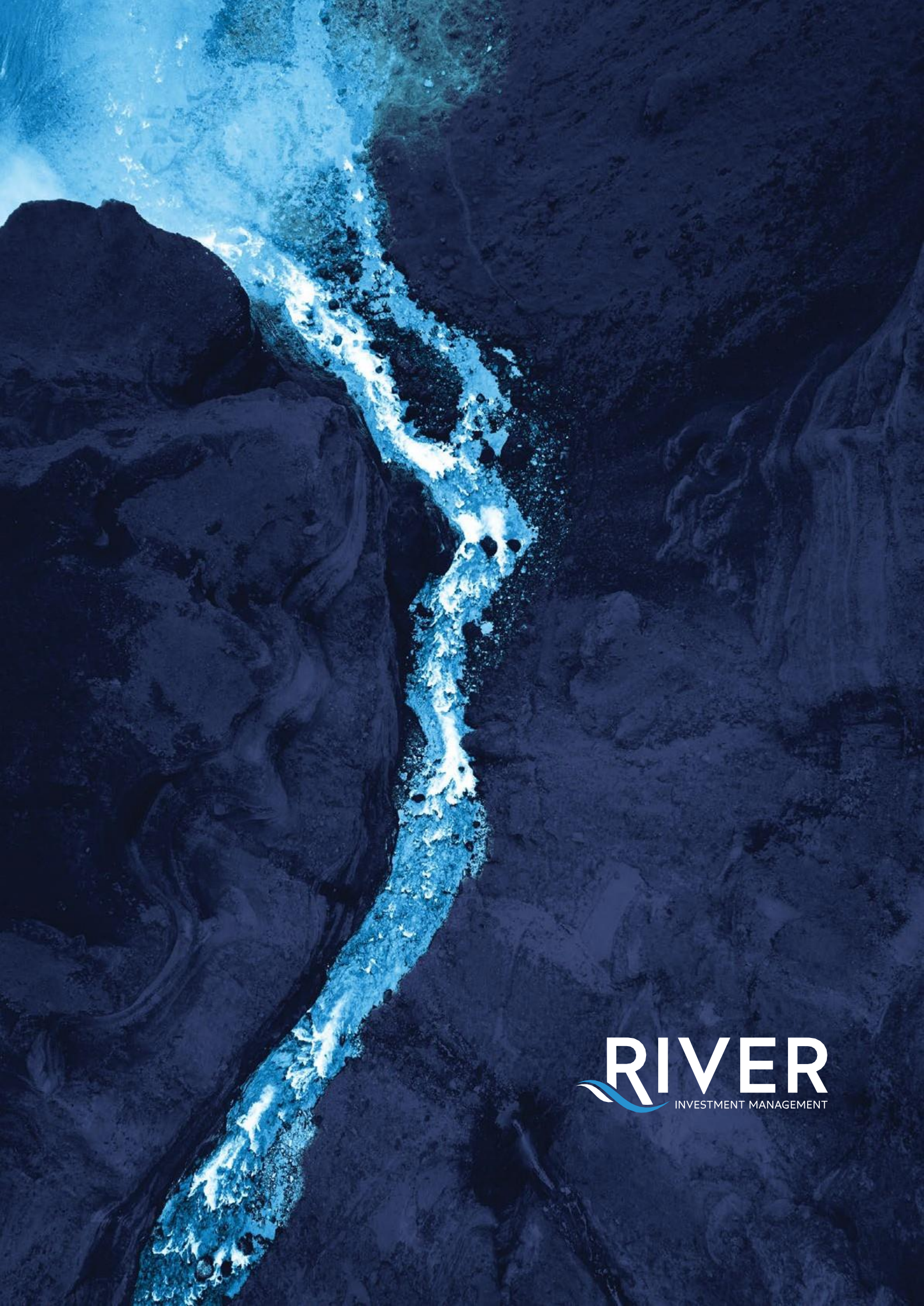
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## Version Control

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<b>V1</b>		<b>Document Created</b>	<b>16/03/2023</b>



**RIVER**  
INVESTMENT MANAGEMENT