

# Shareholder Privacy Policy

26 May 2026 | Version 4

## 1. Purpose

- 1.1 NobleOak Life Limited ACN 087 648 708 (**Company**) recognises the importance of privacy and is committed to protecting your privacy when handling your personal information. This policy explains how the Company will collect, hold, use, disclose, protect and otherwise handle its shareholder's (**you or your**) personal information in accordance with the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth) (**Privacy Act**).

## 2. Scope and definitions

- 2.1 This policy applies to personal information handled by the Company in connection with your shareholding (including communications with you, administration of share registry records, distributions and corporate actions). It does not apply to personal information handled by the Company in connection with insurance products or other services (which is covered by the Company's broader privacy policy, which can be found at [www.nobleoak.com.au/privacy-policy](http://www.nobleoak.com.au/privacy-policy)).
- 2.2 In this policy, **personal information** means information or an opinion about an identified individual, or an individual who is reasonably identifiable.
- 2.3 The Company is bound by the Privacy Act, including the Australian Privacy Principles.
- 2.4 Where lawful and practicable, you may have the option to deal with the Company without identifying yourself or using a pseudonym. However, for shareholder administration (including maintaining registers and complying with legal obligations), it is generally not practicable to do so.

## 3. What personal information does the Company collect?

- 3.1 The Company collects personal information so that it can administer your investment in the Company, provide facilities and services that you request and comply with its legal obligations. If the Company does not collect your personal information, it may not be able to provide you with these services.
- 3.2 In the course of providing you with products and services the Company may collect and hold the following personal information about you:
- (a) your name;
  - (b) address, email address or other contact details;
  - (c) date of birth;
  - (d) tax file number (**TFN**); and
  - (e) banking details.
- 3.3 Generally, the Company will not collect sensitive information about you (such as your race or ethnic origin, political beliefs or religion). If the Company needs sensitive information, it will ask your consent when it collects this information (unless an exemption applies).

## 4. How does the Company collect and hold your personal information?

### *Collecting information*

- 4.1 How the Company collects your personal information will largely depend on whose information it is collecting. If it is reasonable and practicable to do so, the Company will collect personal information directly from you.
- 4.2 Depending on how you choose to interact with the Company, the Company may collect your personal information when you contact the Company or its service providers by telephone, by email, through the Company's website or when you complete a form or document and provide it to the Company.
- 4.3 The Company may also collect information about you from other people (e.g. a third party administrator) or independent sources. For example, the Company may collect personal information about you from its services providers, including the Company's share registry, Automic Pty Ltd (**Automic**). However, the Company will only do so where it is not reasonable and practicable to collect the information from you directly. Where the Company has collected your information from a third party, such personal information will be held, used and disclosed by the Company in accordance with this policy.
- 4.4 When you provide the Company with personal information you consent to the use, disclosure and handling of your personal information in accordance with this policy and any subsequent amendments.

### *Collecting information from visits to the Company's website*

- 4.5 The Company may collect information based on how you use its website. The Company uses 'cookies', web beacons and other similar technologies to collect non-identified/anonymous information about the users of its website such as the number of visitors, the number of pages viewed and the internet advertisements which bring visitors to the Company's website. This information is collected to analyse and improve the Company's website, its marketing campaigns and to record statistics on web traffic. No attempt is made by the Company to use this information to personally identify you.

### *Storage and security of your personal information*

- 4.6 The security of your personal information is of paramount importance to the Company and it takes reasonable steps to protect the personal information it holds about you from misuse, loss, unauthorised access, modification or disclosure.
- 4.7 The Company's website may contain links to other websites. The Company does not share your personal information with those websites and it is not responsible for their privacy practices.

## 5. How does the Company use and disclose your personal information?

- 5.1 The Company may collect, hold, use or disclose your personal information so that it can administer your investment in the Company and provide facilities and services that you request.
- 5.2 The Company may also collect, hold, use or disclose your personal information to:
  - (a) consider any concern or complaint that you raise against the Company or to manage any legal action between you and the Company;

- (b) prevent or investigate any actual or suspected fraud, unlawful activity or misconduct;
  - (c) identify you or establish your tax status under any Australian or foreign legislation; or
  - (d) comply with any relevant laws, regulations, codes or practice and court orders.
- 5.3 The Company may also use your personal information to identify a product or service that may be of interest to you. If at any time you no longer wish to be notified about other services or promotions, please contact the Company. Privacy specific contact details are included at the end of this policy.

## 6. How is personal information disclosed to others?

- 6.1 The Company does not sell, rent or trade personal information to, or with, third parties.
- 6.2 In some circumstances your personal information may be disclosed to service providers that perform a range of services on behalf of the Company including:
- (a) mailing houses and printing companies;
  - (b) auditors and solicitors;
  - (c) registry providers (including the Company's share registry);
  - (d) information technology vendors; and
  - (e) other consultants.
- 6.3 Some of the Company's service providers (including information technology vendors) may be located in Australia and/or overseas, or may store information in Australia and/or overseas.
- 6.4 Where the Company discloses your personal information to its service providers, it will take steps to ensure that they are authorised to only use personal information in order to perform the functions required by the Company.
- 6.5 The Company may also disclose your personal information to law enforcement agencies, courts or government agencies where required to comply with specific legal requirements. In particular, the *Corporations Act 2001* (Cth) requires certain information about you to be included in the Company's registers which are able to be accessed by the public.

## 7. How you may access or correct your personal information

- 7.1 If you need to correct or update personal information recorded in the Company's share register (including your contact details), you should contact the Company's share registry, Automic, to update your records. Shareholders will need to email Automic or use Automic's shareholder portal to update their details.

Automic's contact details are as follows:

**Tel:** 1300 288 664 (within Australia), or +61 (0)2 9698 5414 (outside Australia) within business hours 8.30am to 5.00pm AEST

**Email:** [hello@automicgroup.com.au](mailto:hello@automicgroup.com.au)

**Mail:** Level 5, 126 Phillip Street, Sydney NSW 2000

- 7.2 You may contact the Company to request access to the personal information that it holds about you at any time.

## 8. How you may complain if you have concerns about how the Company has managed your personal information

- 8.1 The Company aims to manage any privacy related complaints promptly and fairly. The Company has an internal dispute resolution process in place, and the Company is a member of an external dispute resolution body. The Company's Complaints Handling Policy & Procedure is intended to ensure that complaints are dealt with fairly, professionally, consistently, and promptly.
- 8.2 Upon receipt of a privacy complaint, the complaint will be escalated to the Company's staff with the appropriate knowledge of the Privacy Act. The Company will then issue you with a timely response that, if appropriate, will outline the measures that the Company will take to resolve the complaint. The Company's objective in all cases will be to resolve your complaint promptly.
- 8.3 You may make a privacy complaint directly to the Company via:
- Tel:** 1300 551 044 during 8:30am – 5:00pm (Sydney time), Monday to Friday
- Email:** [clientcare@nobleoak.com.au](mailto:clientcare@nobleoak.com.au)
- Mail:** GPO Box 4793, Sydney NSW 2001
- 8.4 If you feel the Company has not satisfactorily addressed your complaint, you may also make a complaint to the Australian Government's Office of the Australian Information Commissioner (**OAIC**) via the following channels:
- Tel:** 1300 363 992
- Email:** [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)
- Online:** [www.oaic.gov.au/privacy/privacy-complaints](http://www.oaic.gov.au/privacy/privacy-complaints)
- Mail:** GPO Box 5288, Sydney NSW 2001

## 9. How to contact us

- 9.1 If you have any questions about this policy, please contact the Compliance Manager on:
- Tel:** 1300 396 455
- Email:** [clientcare@nobleoak.com.au](mailto:clientcare@nobleoak.com.au)
- Mail:** NobleOak Life Limited, GPO Box 4793, Sydney NSW 2001

## 10. Changes to the Company's privacy policy and information handling practices

- 10.1 This policy may be updated from time to time. The current version will be made available on the Company's website. The date and version number at the start of this document indicates when it was last updated.
- 10.2 By continuing to use the Company's services you will be deemed to have accepted any changes to its policy.

## 11. Approved and adopted

This policy was approved and readopted by the Board on 26 May 2026.