

Sloan Global Advisors Pty Ltd

Privacy Policy

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1 INTRODUCTION

In accordance with the Privacy Act 1988, Sloan Global Advisors Pty Ltd has implemented policies and procedures relating to personal information collected from all clients and employees. Where applicable, foreign law may override some of the requirements set out in this Policy, which have not been considered when drafting this Policy.

The Act covers personal information that is recorded in some form, which can include an electronic record. Personal information is defined as information or an opinion that can identify a person.

The Act is applicable to businesses with a turnover of more than \$3 million or those that are subsidiaries of or related to businesses with the required turnover. Small businesses may choose to opt into the provisions.

2 SCOPE

The scope of this Policy is to detail Sloan Global Advisors Pty Ltd.'s commitment to ensuring compliance with the Australian Privacy Principles as detailed in the Privacy Act 1988 and the Privacy Amendment (Private Sector) Act 2000 and to define its Policy regarding the following principles:

- Open and transparent management of personal information - Sloan Global Advisors Pty Ltd must have on-going practices and policies in place to ensure that they manage personal information in an open and transparent way and such policies and practices must be documented in its privacy policy which must be readily available to clients.
- Anonymity and Pseudonymity – Individuals must be given the option of not identifying themselves or of using a pseudonym (however it is noted that Sloan Global Advisors Pty Ltd will not be able to deal with clients on this basis as it needs to identify all its clients under the AML CTF Act).
- Collection of solicited personal information – Sloan Global Advisors Pty Ltd must ensure that personal information about a client is only collected when it is necessary for one or more of its functions or activities and that personal information is collected by a lawful and fair means and not in an unreasonably intrusive way. Sensitive information may only be collected with an individual's consent.
- Dealing with unsolicited personal information – If Sloan Global Advisors Pty Ltd receives personal information which is not solicited it must determine whether it would be permitted to collect the information and if not must destroy it.
- Notification of the collection of personal information – Sloan Global Advisors Pty Ltd must make clients aware of the information contained in its Privacy Policy at or before the time, or as soon as practicable after, collecting the information.
- Use and Disclosure of personal Information – Sloan Global Advisors Pty Ltd must ensure personal information about a client is not used or disclosed for any other purpose than the primary purpose of collection or pursuant to this policy.
- Direct marketing – Sloan Global Advisors Pty Ltd may only use or disclose personal information for direct marketing purposes where the individual has either consented to their personal information being used for direct marketing, or has a reasonable expectation that their personal information will be used for this purpose, and conditions relating to opt-out mechanism are met.
- Cross-border disclosure of personal information – Before Sloan Global Advisors Pty Ltd discloses personal information to an overseas recipient, it must take reasonable steps to ensure that the overseas recipient does not breach the APPs in relation to that information.
- Adoption use or disclosure of government related identifiers – Sloan Global Advisors Pty Ltd must not adopt a government related identifier of an individual as its own identifier of the individual.
- Quality of personal information – Sloan Global Advisors Pty Ltd must ensure that reasonable steps have been taken to make sure the personal information collected, used or disclosed is accurate, complete and up to date, having regards to the purpose of the use and disclosure.
- Security of personal information – Sloan Global Advisors Pty Ltd must ensure that reasonable steps have been taken to protect the personal information held by Sloan Global Advisors Pty

Ltd on behalf of its clients and employees from interference, in addition to misuse and loss, and unauthorised access, modification and disclosure. Sloan Global Advisors Pty Ltd must take reasonable steps to destroy or de-identify personal information if the organisation no longer needs it for any authorised purpose.

- Access to personal information –Sloan Global Advisors Pty Ltd must define policies and procedures regarding the release of personal information to clients and employees who initially provided the information.

Correction of Personal Information –Sloan Global Advisors Pty Ltd must take reasonable steps to ensure it updates any request to correct personal information.

3 ROLES AND RESPONSIBILITIES

Sloan Global Advisors Pty Ltd must take reasonable steps to ensure that both clients and employees are aware that it is collecting personal information about them, and the reasons why it is collecting the information. If Sloan Global Advisors Pty Ltd passes this personal information to other individuals or organisations, it must disclose this to the clients or employees concerned. There may be legitimate reasons for collecting and passing on personal information. However, it would be prudent to always seek the individual's consent prior to doing so. Restrictions also exist in the collection and use of sensitive and health information of an individual.

Sloan Global Advisors Pty Ltd has appointed a Privacy Officer, who is responsible for the ongoing development and implementation of a privacy regime that complies with the Law, yet is tailored to its particular circumstances. The Privacy Officer for Sloan Global Advisors Pty Ltd is the COO.

The Privacy Officer or delegate is responsible for ensuring that the collection of personal information is consistent with the Australian Privacy Principles as defined in the Privacy Act 1988. These responsibilities include:

- conducting an annual privacy audit;
- formulating and reviewing Sloan Global Advisors Pty Ltd privacy policy;
- co-ordinating and implementing the privacy policy; and
- promoting the policy and scheme requirements to all affected parties.

The Privacy Officer will be responsible for ensuring that all privacy procedures are fully implemented and that the scheme is running effectively.

Every employee involved in the collection, use, disclosure and security of personal information must ensure that:

- all personal information is accurate and up to date at all times;
- no personal information is disclosed or used, except as permitted by this Policy; and
- all personal information is kept secured.

4 DEFINITIONS

Personal Information – information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

Sensitive Information means:

- information or an opinion that is also personal information about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record; or
- health information about an individual; or
- generic information about an individual that is not otherwise health information.

Health Information means:

- information or an opinion that is also personal information about the health or a disability (at any time) of an individual, an individual's expressed wishes about the future provision of health services to him or her, a health service provided, or to be provided, to an individual; or
- other personal information collected to provide, or in providing, a health service; or
- other personal information about an individual collected in connection with the donation, or intended donation, by the individual of his or her body parts, organs or body substances; or
- genetic information about an individual in a form that is, or could be, predictive of the health of the individual or a genetic relative of the individual.

Employee Record – in relation to an employee, Employee Record means a record of personal information relating to the employment of the employee. Examples of personal information relating to the employment of the employee are health information about the employee and personal information about all or any of the following:

- the engagement, training, disciplining or resignation of the employee;
- the termination of the employment of the employee;
- the terms and conditions of employment of the employee;
- the employee's personal and emergency contact details;
- the employee's performance or conduct;
- the employee's hours of employment;
- the employee's salary or wages;
- the employee's membership of a professional or trade association;
- the employee's trade union membership;
- the employee's recreation, long service, sick, personal, maternity, paternity or other leave; and
- the employee's taxation, banking or superannuation affairs.

5 COLLECTION OF PERSONAL INFORMATION

Australian Privacy Principle No.3 deals with the collection of personal information and allows for the collection of personal information by a business only when it is necessary for one or more of its functions or activities.

Sloan Global Advisors Pty Ltd collects personal information from:

- its investors as part of the account opening process; and
- its employees and contractors as part of its due diligence process when offering them employment.

The management of Sloan Global Advisors Pty Ltd is committed to ensuring that all personal information collected from its clients and employees is afforded an appropriate level of privacy in accordance with the Privacy Act and the Australian Privacy Principles, by which Sloan Global Advisors Pty Ltd is bound.

Personal information can only be collected under the following circumstances:

- the information collected is relevant to that purpose and is up to date and complete;
- the collection of the information does not intrude to an unreasonable extent upon the personal affairs of the individual concerned;
- for lawful purposes; and
- for purposes directly related to the functions and activities of Gleneagle.

Prior to or as soon as practicable after the information is collected, Sloan Global Advisors Pty Ltd is to take reasonable steps to ensure that the individual concerned is aware of:

- the purpose for which the information is being collected;
- if the collection of the information is authorised or required by or under law – the fact that the collection of the information is so authorised or required; and
- any person to whom, or any body or agency, to which it is the collector's usual practice to disclose personal information of the kind so collected, and (if known by the collector) any

person to whom, or any body or agency to which, it is the usual practice of that first-mentioned person, body or agency to pass on that information.

A number of methods can be utilised to collect personal information. Sloan Global Advisors Pty Ltd will only use the following methods to collect Personal Information:

- upon application for services – verbally via telephone or in writing by completing an application form;
- upon request to update records maintained by Sloan Global Advisors Pty Ltd – all such requests must be in writing, either by email (if the email address can be verified against the records maintained by Gleneagle) or by letter or facsimile. If updated details are provided verbally, then all reasonable efforts must be made to verify the identity of the caller; and
- from public records – for example details relating to Directors, Shareholders and Officeholders of a Corporation.

6 COLLECTION OF SENSITIVE INFORMATION

Australian Privacy Principle No.3.3 details the circumstances under which an organisation can collect sensitive information from clients. Sloan Global Advisors Pty Ltd can only collect sensitive information if:

- the individual has consented in writing; or
- the collection of such information is required by law; or
- the collection of such information is necessary for the establishment, exercise or defence of a legal or equitable claim.

7 COLLECTION OF TAX FILE NUMBERS

Tax file numbers shall not be collected, recorded, used or disclosed in an unauthorised manner and, in particular, shall not be used as a means of matching personal information about a person.

All employees receiving information relating to an individual's tax file number shall take all reasonable steps in the circumstances to ensure that the manner of collection takes account of the rights of persons to control the accumulation and dissemination of information relating to them.

All reasonable steps in the circumstances must be taken to ensure that:

- security safeguards and procedures are in place to prevent unauthorised access to, modification or disclosure of, and loss of, such information, whether that information is stored in physical or electronic form; and
- access to records which contain tax file number information for authorised purposes is confined to persons who have a need for access to such information for the purpose of carrying out tax-related functions for the person the tax file number belongs to.
- Reasonable steps would include that the client files containing this information are kept in lockable cabinets, and user identity or access codes for computer systems on which this information is recorded. You might also restrict access to records of files containing this information to only certain personnel within your office.

8 WEBSITE PRIVACY POLICY

Sloan Global Advisors Pty Ltd may obtain personal information:

- when an individual knowingly gives that information when requesting forms or other information on Sloan Global Advisors Pty Ltd website or contacting Sloan Global Advisors Pty Ltd via its website, including email; and
- by cookies when a person visits Sloan Global Advisors Pty Ltd website.

The personal information collected via the website is solely collected for the following reasons:

- to respond to queries or requests for information;

- to keep a record of its dealing with clients;
- to develop a data profile to enable it to tailor services to its clients and to enhance the content of its website; and
- to send notices to clients about financial products and services Sloan Global Advisors Pty Ltd offers.

When an individual gives Sloan Global Advisors Pty Ltd personal information, that person consents to these uses, although in the case of receiving marketing material, the person will have the option to opt out by emailing or otherwise contacting Sloan Global Advisors Pty Ltd Privacy Officer.

9 RECORDING OF PERSONAL INFORMATION

Sloan Global Advisors Pty Ltd will maintain records detailing personal information:

- of its previous and current clients to ensure that it is able to identify its clients and for the purpose of providing financial products and services to its clients; and
- of its previous and current employees to the extent necessary and required by governing law and for any other purpose associated with your employment at Gleneagle.

All client and employee records are kept indefinitely.

The following persons within Sloan Global Advisors Pty Ltd will have access to the records:

- only those persons directly involved in providing the product or service to an investor have access to such information relating to clients or as agreed by the client in writing; and
- only senior management and persons responsible for the Human Resources function are entitled to have access to personal information maintained on behalf of employees or as agreed by the employee in writing.

10 USE OF PERSONAL INFORMATION

Australian Privacy Principle No.6 details the circumstances under which an organisation can use the personal information it collects and the entities to which and the circumstances under which it can disclose the personal information. Sloan Global Advisors Pty Ltd will use personal information about individuals as follows:

- as the individual consents;
- for the purpose of providing the financial products and services the individual requests and for other purposes for which the information was given to Gleneagle;
- for purposes related to the reason the individual gave Sloan Global Advisors Pty Ltd the information, but only if that person would reasonably expect Sloan Global Advisors Pty Ltd to use it for that purpose;
- as required for law enforcement, public health or public safety reasons; and
- for product development and for marketing purposes from time to time.

11 USE OF PERSONAL INFORMATION FOR DIRECT MARKETING

If Sloan Global Advisors Pty Ltd sends direct marketing material to an individual, Sloan Global Advisors Pty Ltd will give that person an opportunity to refuse receipt of further information, at that time. Any concerns regarding how to and to whom Direct Marketing can be issued should be directed to Sloan Global Advisors Pty Ltd Privacy Officer.

12 DISCLOSURE OF PERSONAL INFORMATION

The disclosure of sensitive information collected by Sloan Global Advisors Pty Ltd is prohibited under all circumstances.

In providing clients with the financial products and services they have requested, Sloan Global Advisors Pty Ltd may need to disclose personal information to others. For example, disclosure of personal information to parties that are contracted by Sloan Global Advisors Pty Ltd to provide a particular service, such as auditors, compliance consultants and lawyers.

Sloan Global Advisors Pty Ltd ensures that those contractors are bound by the same privacy rules it follows and that those contracting parties are not authorised to use personal information for anything other than the purpose for which Sloan Global Advisors Pty Ltd supplies that information to them.

During the course of its operation, Sloan Global Advisors Pty Ltd may be required to disclose personal information to third parties. The circumstances under which such disclosure is acceptable are as follows:

- Sometimes, the law requires Sloan Global Advisors Pty Ltd to disclose personal information to third parties. For example, in response to a subpoena issued by a court or to a Government Agency.
- The Privacy Act permits Sloan Global Advisors Pty Ltd to share the personal information that it holds with its related companies. If Sloan Global Advisors Pty Ltd's related companies are entitled to use that personal information, they may only do so for the purposes for which Sloan Global Advisors Pty Ltd collected the personal information unless the person concerned otherwise agrees.

Sloan Global Advisors Pty Ltd will not disclose any personal information unless:

- the individual concerned is reasonably likely to have been aware, or was made aware, that information of that kind is usually passed to a third party, for example, a related body corporate or a supplier used to provide the financial product or service to the client or employee; or
- as required by law or for law enforcement, public health or public safety reasons;
- the individual concerned has consented to the disclosure.

13 SECURITY OF PERSONAL INFORMATION

Australian Privacy Principle No. 11 requires each business to ensure that it has appropriate systems and processes in place to keep personal information secured and to dispose of such information when it is no longer required.

Sloan Global Advisors Pty Ltd will take all reasonable steps in its power to protect the personal information it holds from misuse, loss, modification, disclosure and unauthorised access and to prevent unauthorised use or disclosure of information contained in records given to a person in connection with the provision of a service.

Some of the steps taken by Sloan Global Advisors Pty Ltd to protect personal information and prevent the unauthorised disclosure of information include:

- restricting the access to its computer systems and physical records to authorised persons and prevent users from accessing information they have no need to access;
- requiring employees to use unique passwords to gain access to systems. These passwords are changed regularly;
- encrypting data sent from other computers to Sloan Global Advisors Pty Ltd systems during internet transactions;
- employing firewalls, intrusion detection services and virus scanning tools to prevent unauthorised persons and viruses from entering its systems;
- providing secure storage for physical records; and
- preventing unauthorised access to Sloan Global Advisors Pty Ltd offices by providing security keys to authorised persons.

14 ACCESS TO PERSONAL INFORMATION

Australian Privacy Principle No.12 details the circumstances under which it can give to a person access to the information it holds about them.

Only employees of Sloan Global Advisors Pty Ltd and those who perform services on Sloan Global Advisors Pty Ltd behalf are authorised to handle or have access to personal information provided by a client. As all of Sloan Global Advisors Pty Ltd 's Representatives are bound both by Sloan Global Advisors Pty Ltd AFS Licensee Manual and by confidentiality clauses in their employment agreements or agency deed they are not permitted to use, disclose or access such personal information except as permitted by this policy.

Only those employees of Sloan Global Advisors Pty Ltd permitted by this policy are authorised to handle or have access to personal information provided by employees of Gleneagle. Those who perform services on Sloan Global Advisors Pty Ltd behalf and require access to such information will be authorised to have access. Such persons are also bound by privacy and confidentiality agreements.

Individuals can access most of the personal information Sloan Global Advisors Pty Ltd holds about them. If access is restricted or refused, Sloan Global Advisors Pty Ltd will provide the reason why. All requests for access to personal information should be directed to Sloan Global Advisors Pty Ltd Privacy Officer. A reasonable charge may apply to gain access to the information. The client should be advised of any charges that may apply when they make a written request.

In advising the staff member or Representative on how to proceed regarding providing client access to information, the Privacy Officer will ascertain:

- Whether there is a complaint history or a current complaint relating to the client. If a complaint is in process, the Privacy Officer will confer with the P.I. Insurer prior to processing the request.
- Whether the file contains any sensitive documents that may adversely affect the position or reputation of Sloan Global Advisors Pty Ltd or Representative. The Privacy Officer is to liaise with the staff member to assess this
- Where there are any constraints (i.e. time, physical, monetary) which will affect the issuance of such information to the client. The Privacy Officer is to determine and instruct the staff member on a suitable delivery of the information requested, to overcome these constraints.
- Without being required to follow the above procedures, the Privacy Officer is able to authorise straight forward requests for information, which may include:
 - A summary of personal information held on file
 - Copies of data collection type forms
 - Copies of all correspondence issued to the client

Details of all request will be kept on a Privacy Register and will include details of the client name, address, staff member name, date of request, nature of request, date request completed, and the authorisation provided or reason why request was denied. The request is to be responded to within 14 days.

15 KEEPING INFORMATION ACCURATE, COMPLETE AND UP-TO-DATE

Australian Privacy Principle No.10 requires a business to take reasonable steps to ensure that the information it collects is complete and up to date.

Sloan Global Advisors Pty Ltd takes all reasonable steps to ensure that the personal information it holds is accurate, complete and up to date. Any issues should be directed to the attention of Sloan Global Advisors Pty Ltd Privacy Officer.

16 PROVISION OF PRIVACY POLICY TO CLIENTS

Australian Privacy Principle No.1 requires a business to clearly describe its policies relating to the management of personal information and to ensure that such document is readily available to clients.

Sloan Global Advisors Pty Ltd provides information relating to its Privacy Policy via the following:

- Sloan Global Advisors Pty Ltd website; and
- in writing, when requested by a client.

17 COMPLAINTS

If a client or an employee has a complaint regarding the treatment of any information collected, used or disclosed by Gleneagle, all relevant details should be forwarded to Sloan Global Advisors Pty Ltd Privacy Officer. The Privacy Officer will review the complaint in accordance with Sloan Global Advisors Pty Ltd Internal Dispute Resolution Procedure.

18 PRIVACY AUDITS

Sloan Global Advisors Pty Ltd conducts a Privacy Audit as a means of establishing what sort of information is collected and held as an organisation. The Audits are also useful in ascertaining how the information is used and who it is shared with. The Privacy Audit is conducted by the Privacy Officer on an annual basis.

19 IMPLEMENTATION REVIEW AND MONITORING

Sloan Global Advisors Pty Ltd ensures the effective implementation of this Policy to ensure that all representatives are aware of their obligations regarding Information Barriers. All new starters must read the Sloan Global Advisors Pty Ltd Privacy Policy when they join.

This Policy is reviewed to monitor its effectiveness and to consider its suitability, adequacy and identify any deficiencies. Where necessary, it will be updated to ensure that the Policy is in line with all regulations, updates and notifications to keep Sloan Global Advisors Pty Ltd compliant and performing to their best ability. Review and assessment of this Policy will be carried out at least annually or whenever a material change occurs. Any changes to this Policy will be communicated down to the business.

Compliance with this Policy ensures Sloan Global Advisors Pty Ltd meets its obligations. Apart from what has already been covered off in the policy, Sloan Global Advisors Pty Ltd Compliance will monitor this Policy's use and effectiveness through ensuring that:

- all Sloan Global Advisors Pty Ltd representatives attest annually that they understand and comply with this Policy;
- employees meet their ongoing training requirements in relation to Privacy;

20 NOTIFIABLE DATA BREACH SCHEME

Sloan Global Advisors Pty Ltd is required to notify any affected individuals and the Office of the Australian Information Commission (OAIC) when a data breach is likely to result in serious harm to individuals whose person information is involved with the breach.

This notification must include recommendations on what steps the individuals should take in response to the breach. Notifications to the OAIC must be made through a Notifiable Breach form

<https://forms.business.gov.au/smartforms/landing.htm?formCode=OAIC-NDB>).

The NDB scheme only applies to data breaches that are likely to result in serious harm to the individuals. These are referred to as “eligible data breaches”.

An eligible data breach arises when the following criteria are met:

1. there is unauthorised access to or unauthorised disclosure of personal information, or a loss of personal information, that an entity holds
2. this is likely to result in serious harm to one or more individuals and;
3. the entity has not been able to prevent the likely risk of serious harm with remedial action

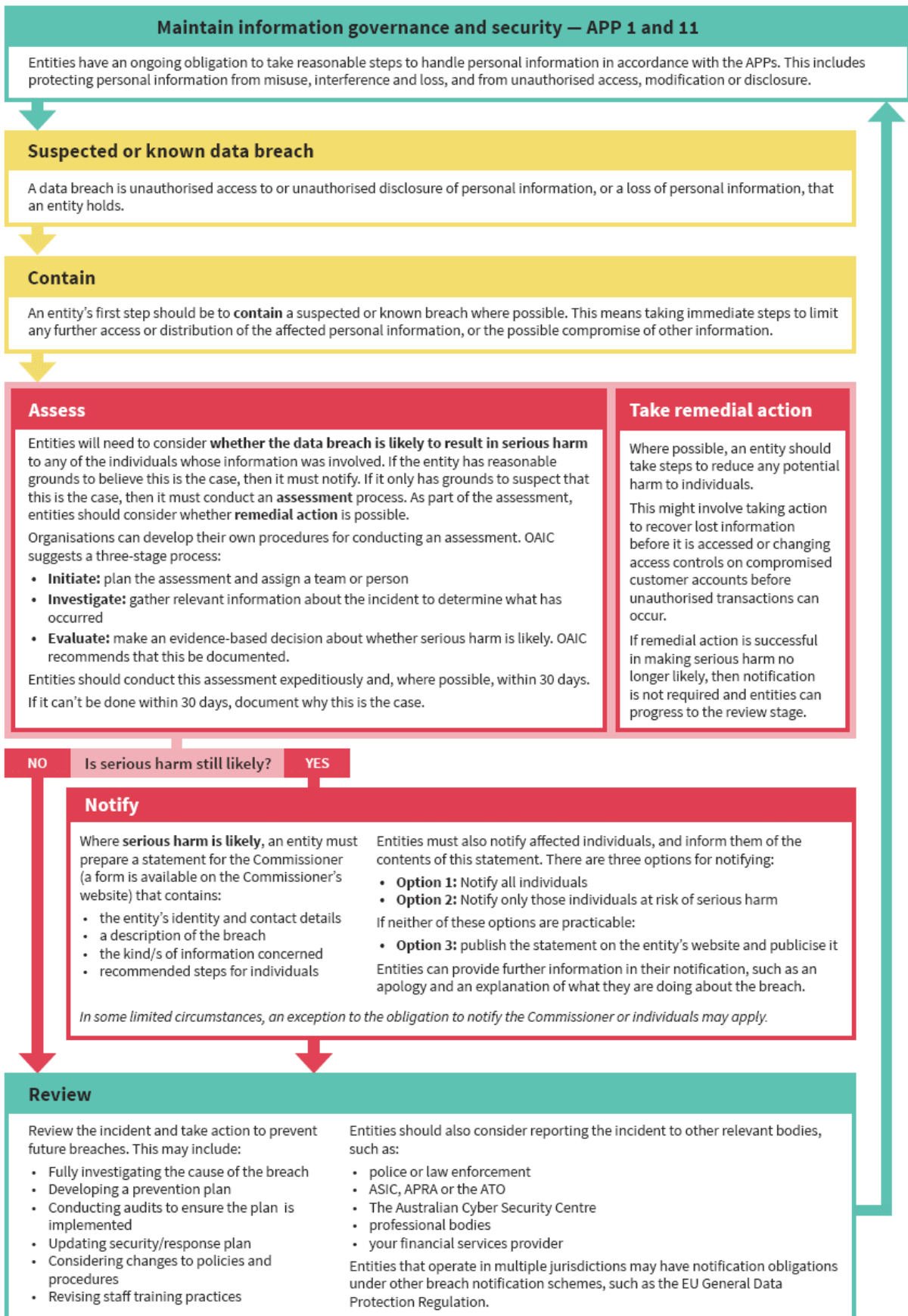
The Data breach summary flowchart is shown in Appendix 1

21 EU GENERAL DATA PROTECTION REGULATION

For those clients residing in the European Union (EU) Sloan Global Advisors Pty Ltd is required to adhere to the EU General Data Protection Regulation (GDPR). Many of the requirements of the GDPR and the Australian Privacy Act 1988 have many common requirements however there are certain requirements in the GDPR which are not reflected in the Australian legislation.

Under the GDPR individual must provide explicit consent for the use and storage of their data. Additionally, the GDPR requires mandatory data breach notification for all breaches whereas the Australian act only requires in situations of real risk of serious harm. The GDPR also provides the individual with the right to have their data erased and can object to the storage of the data with no such provisions under the Australian act. It should be noted that the GDPR imposes significant sanctions for breaches. Refer to Appendix 2 for key difference between the Australian Privacy Act 1988 and the GDPR.

Appendix 1 - Data breach summary flowchart



	EU GDPR	Australian Privacy Act
Who does this apply to?	Data processing activities of businesses, regardless of size, that are data processors or controllers	Most Australian Government agencies, all private sector and not-for-profit organisations with an annual turnover of more than \$3 million, all private health service providers and some small businesses.
What does it apply to?	Personal data – any information relating to an identified or identifiable natural person: Art 4(1)	Personal information (PI) – information or an opinion about an identified individual, or an individual who is reasonably identifiable: s 6(1)
Jurisdictional link	Applies to data processors or controllers: with an establishment in the EU, or outside the EU, that offer goods or services to individuals in the EU or monitor the behaviour of individuals in the EU: Art 3	Applies to businesses: incorporated in Australia, or that ‘carry on a business’ in Australia and collect PI from Australia or hold PI in Australia: s 5B
Accountability and governance	Controllers generally must: implement appropriate technical and organisational measures to demonstrate GDPR compliance and build in privacy by default and design: Arts 5, 24, 25 undertake compulsory data protection impact assessments: Art 35 appoint data protection officers: Art 37	APP entities must take reasonable steps to implement practices, procedures and systems to ensure compliance with the APPs and to enable complaints: APP 1.2 Businesses are expected to appoint key roles and responsibilities for privacy management and to conduct privacy impact assessments for many new and updated projects
Consent	Consent must be: freely given, specific and informed, and an unambiguous indication of the data subject's wishes which, by a statement or by a clear affirmative action, signifies agreement to processing: Art 4(11)	Key elements: the individual is adequately informed before giving consent, and has the capacity to understand and communicate consent the consent is given voluntarily the consent is current and specific: OAIC's APP GLs
Data Breach notifications	Mandatory DBNs by controllers and processors (exceptions apply): Arts 33-34	From 22 February 2018, mandatory reporting for breaches likely to result in real risk of serious harm

<p>Individual rights</p>	<p>Individual rights include: right to erasure: Art 17 right to data portability: Art 20 right to object: Art 21</p>	<p>No equivalents to these rights. However, business must take reasonable steps to destroy or de-identify PI that is no longer needed for a permitted purpose: APP 11.2. Where access is given to an individual's PI, it must generally be given in the manner requested: APP 12.5</p>
<p>Overseas transfers</p>	<p>Personal data may be transferred outside the EU in limited circumstances including: to countries that provide an 'adequate' level of data protection where 'standard data protection clauses' or 'binding corporate rules' apply approved codes of conduct or certification in place: Chp V</p>	<p>Before disclosing PI overseas, a business must take reasonable steps to ensure that the recipient does not breach the APPs in relation to the information: APP 8 (exceptions apply). The entity is accountable for a breach of the APPs by the overseas recipient in relation to the information: s 16C (exceptions apply)</p>
<p>Sanctions</p>	<p>Administrative fines of up to €20 million or 4% of annual worldwide turnover (whichever is higher): Art 83</p>	<p>Powers to work with entities to facilitate compliance and best practice, and investigative and enforcement powers: Parts IV and V</p>