Privacy Policy

4Front Pty Ltd (ACN 652 366 099)
As adopted by the 4Front Board

1 Privacy Policy

1.1 4Front Pty Ltd (Company) respects your privacy and is committed to protecting your privacy. The Company understands the importance you attach to information that identifies you (your 'personal information') and we want to help you protect it.

1.2 We are bound by and committed to supporting, the *Privacy Act 1988* (Cth) and the Australian Privacy Principles (APPs). This Privacy Policy explains how we handle information that we learn about you when you submit any personal information to us or our associated entities in person, by mail or email or by visiting our website.

2 How do we collect personal information from you?

2.1 We will only collect personal information which you have voluntarily provided to us or consented to us collecting the information. We may collect personal information about you in a variety of ways, for example:

- When you visit or use our website;
- When you retain our services;
- When you register for secure access to our website and login to your account on our website (if applicable);
- When you contact us or our associated entities, for example by mail, email or telephone;
- When you apply for employment with us; and
- From third party entities, such as law enforcement agencies and other government or regulatory bodies.

2.2 From time to time, you may be able to visit our website or deal with us anonymously or by pseudonym. However, we require certain personal information to be able to provide you with the services and information you request. If you do not provide us with certain personal information, we may not be able to provide you with access to those services or respond to your request.

3 What type of personal information do we collect?

3.1 The type of personal information we may collect from you includes (but is not limited to):

- names, address, email, phone numbers and job titles;
- information in documents such as passport or driver's licence;
- tax file numbers (TFNs) and other identification numbers such as Medicare number;
- date of birth and gender;
- information about ownership, control and beneficial ownership structures, and source of funds or source of wealth information where relevant to the services we provide or required by law;
- financial information;
- details of superannuation and insurance arrangements;
- sensitive information (with your consent), such as health information or membership details of professional or trade associations or political parties;
- bank account details, shareholdings and details of investments;
- educational qualifications, employment history and salary;
- visa or work permit status; and
- personal information about your spouse and dependants.

4 How do we use your personal information?

4.1 The Company will use the information you supply for the purpose of providing you with the service(s) agreed under our engagement, such as accounting or business advisory services.

4.2 The Company will use the information you supply for the purpose of complying with our obligations under the Anti Money Laundering and Counter-Terrorism Financing Act 20026 and rules (AML/CTF Laws).

4.3 We may also use the information we collect for our internal business and management processes (for example, accounting or auditing purposes), monitoring and improving our website, keeping you informed about our services and company news, and for any other purposes that would be reasonably expected by you and to allow us to comply with our obligations under the law.

4.4 The Company may also use your personal information for the purpose of marketing our services. If you do not want to receive marketing material from us, you can unsubscribe by contacting us as detailed below:

- For electronic communications, you can click on the unsubscribe function in the communication;
- For hard copy communications, you can email the Company via privacy@4front.net.auinforming us that you wish to unsubscribe.

5 How do we disclose your personal information?

5.1 Your personal information will only be disclosed to those employees or consultants of the Company related to the agreed provision of services. Depending on the nature of the engagement, we may need to disclose your personal information to third parties which may include service and content providers (for example accounting or auditing service providers or our website hosting service providers), dealers and agents, or our contractors and advisors.

5.2 Important Notice: in the event that the processing or use of your personal information involves the disclosure of any information outside Australia, you acknowledge that by providing us with your personal information, you consent to such overseas disclosure. By consenting to such disclosure, you acknowledge and accept that:

- The Company will not be accountable under the *Privacy Act 1988* (Cth) for any breach of your privacy by the overseas recipient; and
- You will not be able to seek redress under the *Privacy Act 1988* (Cth) for any breach of your privacy by the overseas recipient.

5.3 We may disclose information to:

- Electronic verification providers
- Regulatory authorities, including AUSTRAC
- Courts, tribunals or law enforcement agencies where authorised or required by law

5.4 The Company shall not knowingly provide personal information to any third party for any other purpose without your prior consent unless ordered to do so by a law enforcement body, court of law or other governmental or regulatory body or agency.

5.5 The Company may store, process or back-up your personal information on servers that are located overseas (including through third party service providers). The privacy laws in other countries might not be the same as in Australia. However, where the Company provides your personal information to third parties overseas, the Company will take such steps as are reasonable to ensure that your information is handled and stored in accordance with Australian privacy laws and this Policy.

6 Collection, use and disclosure of personal information under the Anti Money Laundering and Counter Terrorism Financing Act 2006

6.1 Where we provide designated services to you (as defined in the Anti Money Laundering and Counter- Terrorism Financing Act 2006) we may collect, hold, use and disclose your personal information to comply with those requirements

This may include collecting, using and disclosing personal information to identify and verify you and your associated entities, beneficial owners, controllers and other relevant parties. It may also include undertaking initial and ongoing due diligence and complying with reporting requirements.

The kinds of personal information we collect for these purposes will depend on the designated service being provided and will be limited to the information reasonably necessary to comply with AML/CTF laws.

Identity verification may be undertaken electronically using third-party verification providers and government data sources were permitted by law.

We will only use information for the purpose for which it was collected, unless you consent to another use or the use is otherwise permitted under the law.

If sufficient information is not provided, we may be unable to commence or continue providing services.

6.2 If you apply for employment with us, or are employed or engaged by us, we may collect, hold, use and disclose personal information about you to undertake reasonable identity, background, qualifications, compliance and regulatory checks (including criminal history, sanctions and politically exposed person (PEP) screening, and any fit-and-proper or suitability checks required under Anti-Money Laundering and Counter-Terrorism Financing Act 2006 and rules (AML/CTF laws) that we consider necessary to meet our legal, regulatory and professional obligations.

7 Access to your personal information

7.1 You can request us to provide you with access to personal information we hold about you by sending us an email: privacy@4front.net.au or writing to us at PO Box 965, Capalaba QLD 4157.

7.2 We may allow an inspection of your personal information in person, or provide copies or a summary of relevant documents, depending on what is the most appropriate in the circumstances. Any charge we make for providing access will be reasonable and will not apply to lodging a request for access. Your request to access your personal information will be dealt with in a reasonable time.

7.3 Note that we need not provide access to personal information if a request is frivolous, or where to provide access would pose a threat to health or public safety, unreasonable interference with another person's privacy, or be a breach of the law. If we refuse access, we will provide you with reasons for doing so.

8 Accuracy and correction

8.1 To enable us to keep our records properly, please notify us if you believe that any information we hold about you is inaccurate, incomplete or out of date and we will take reasonable steps, in the circumstances, to ensure that it is corrected. You can notify us by sending us an email: privacy@4front.net.auor writing to us at PO Box 965, Capalaba QLD 4157.

9 Our security procedures

9.1 The Company takes your privacy very seriously. We will take reasonable steps in the circumstances to protect any personal information you provide to us from misuse, interference or loss and unauthorised access, modification and disclosure.

9.2 We will also deidentify and destroy the personal information we hold about you once our legal obligations cease. Our security procedures are reviewed from time to time and we update them when relevant.

9.3 Please be aware that the transmission of data over the internet is never guaranteed to be completely secure. It is possible that third parties not under the control of the Company may be able to access or intercept transmissions or private communications without the Company's permission or knowledge. The Company takes all reasonable steps, in the circumstances, to protect your personal information. However, we cannot ensure or warrant the security of any information you transmit to us. Such transmissions are done at your own risk.

10 Data breach notification

10.1 Under the *Privacy Amendment (Notifiable Data Breaches) Act 2017* (Cth), the Company is required to give notice to the Office of the Australian Information Commissioner (OAIC) and affected individuals of an "eligible data breach". This means that if we hold personal information about you, and there is unauthorised access to or disclosure of your personal information, and if you, as the "affected individual" would be likely to suffer serious harm from this access or disclosure, we must notify both you and the OAIC.

10.2 "Serious harm" could include identity theft, threats to physical safety, economic and financial harm, harm to reputation, embarrassment, discrimination or harassment. The test is whether a "reasonable person" would expect you to suffer serious harm.

10.3 If you are likely to suffer serious harm from a data breach, we will notify you of:

- the nature of the eligible data breach (i.e. how the information was accessed or disclosed);
- the type of information that was accessed or disclosed;
- the steps that we have taken to control or reduce the harm, and those that we plan to take;
- any assistance we can offer you, such as arranging for credit monitoring;
- anything that we can suggest you can do to assist yourself or mitigate the harm;
- whether the breach has also been notified to the OAIC;
- how you can contact us for information or to complain; and
- how to make a complaint with the OAIC.

10.4 We will notify you using the same method that we usually use to communicate with you. If it is not practicable for us to notify you personally, we will publish the notification on our website.

10.5 There are some circumstances in which we do not have to notify you of a data breach. These include:

- where we have taken remedial action before any serious harm has been caused by the breach;
- if you have been notified of the breach by another entity;
- if notification would be inconsistent with Commonwealth secrecy laws; or
- where the OAIC declares that notification does not have to be given.

10.6 Depending on the nature of the breach and the harm, we will also consider informing other third parties such as the police or other regulators or professional bodies.

11 Identifiers

11.1 We will not adopt as our own, any government identifiers you may provide to us such as TFNs etc.

12 Links to other sites

12.1 The Company's website may provide links to other sites for you to access. You should be aware that these other sites are not subject to this Privacy Policy or our privacy standards and procedures. You will need to contact them directly to ascertain their privacy standards.

13 Collecting data

13.1 The Company's website may deposit "cookies" in a visitor's computer. Cookies are pieces of information that a website transfers to an individual's hard drive for record keeping purposes. Cookies are only sent back to the website that deposited them when a visitor returns to that site.

13.2 Cookies make it easier for you by saving your preferences while you are at our site. We never save personal identifiable information in cookies. Most web browsers are initially set up to accept cookies. You can, however, reset your browser to refuse all cookies or to indicate when a cookie is being sent.

14 Changes to our Privacy Policy

14.1 This information relates to our current Privacy Policy. From time to time, we may vary this policy for any reason. We will publish any changes on this website.

14.2 By continuing to use our website and continuing to provide us with your information, you confirm your acceptance of these changes. This Privacy Policy was last amended in June 2026.

15 Complaints resolution

15.1 The Company is committed to providing a fair and responsible system for the handling of complaints from parties whose personal information we hold. If you have any concerns regarding the way we have handled your privacy, please send us an email at privacy@4front.net.auor write to us at PO Box 965, Capalaba QLD 4157. We

will address any concerns you have through our complaints handling process and we will inform you of the outcome of your complaint within a reasonable timeframe.

15.2 If after receiving our response, you still consider that your privacy complaint has not been resolved, you may refer your concerns to the Office of the Australian Information Commissioner at www.oaic.gov.au.

16 Disclaimer

16.1 By using the Company's website, you signify your understanding and agreement to comply with all terms and conditions and confirm your acceptance of the terms of this Privacy Policy and consent to the use of your personal information as set out in this Privacy Policy.

16.2 If you do not agree with the terms of this Privacy Policy, please do not use the website or otherwise provide us with your personal information.

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