

# SHAREHOLDERS' PRIVACY POLICY

**Qpro Holdings Limited (proposed to be renamed  
PKS Holdings Limited)**  
ACN 627 071 121

## **PRIVACY POLICY - SHAREHOLDERS**

Qpro Holdings Limited (proposed to be renamed PKS Holdings Limited) ACN 627 071 121 (**Company, We or Us**) c/- Whittens & McKeough, Level 5, 126 Phillip Street, Sydney NSW 2000 is currently undertaking an initial public offering and is in the process of being admitted to the Official List of the ASX.

We take the privacy of shareholders seriously and take reasonable measures to ensure that personal information we collect is not mismanaged or abused.

The following Privacy Policy guides the usage of all personal information which we collect from shareholders, and contains the rights with respect to their personal information. This policy may be updated from time to time, at our discretion.

### **1 WHY AND HOW WE COLLECT INFORMATION FROM SHAREHOLDERS**

1.1 The Company collects and holds personal information from shareholders primarily for the following purposes:

- (a) to assess your application;
- (b) to ensure compliance with laws on the maintenance of registers including members register and other reporting legal requirements;
- (c) in order to provide communications to shareholders which Qpro is required by law to provide and which the company feels it is desirable to provide;
- (d) in order to facilitate shareholders' participation in the company and enjoyment of rights attached to shares, such as payment of dividends and voting of shares; and
- (e) in order to offer existing shareholders further shares or other Company securities.

1.2 The personal information we collect from shareholders includes the following:

- (a) name;
- (b) contact details;
- (c) tax file number;
- (d) CHESS HIN or SRN;
- (e) whether shares are held beneficially; and
- (f) information in relation to voting such as information indicated on proxy forms.

1.3 The Company collects personal information directly from shareholders or from their professional advisers and agents such as stock brokers.

### **2 DISCLOSURE OF PERSONAL INFORMATION**

2.1 The Company only discloses the personal information of shareholders to other persons for the purposes listed in this document and for purposes which are associated with these.

2.2 In order to achieve the listed purposes, we disclose the personal information of shareholders to service providers such as:

- (a) share register service providers;
- (b) lawyers;
- (c) accountants;
- (d) brokers engaged in capital raising; and
- (e) printing and mailing companies.

- 2.3 We also disclose personal information of shareholders which forms part of the register when providing access to inspect the registers to any member of the public which we are required to do by law.
- 2.4 As none of our service providers are currently located offshore, we are unlikely to disclose shareholders' personal information (other than information which appears in the registers) to overseas recipients.

### **3 HOLDING OF PERSONAL INFORMATION**

Any personal information collected by the Company may be stored both electronically and in hard copy in our office or at the offices of our service providers such as share registry services providers, lawyers, accountants or auditors.

### **4 ACCESS TO YOUR PERSONAL INFORMATION**

4.1 You may request to access your personal information. If you believe that the personal information we hold is inaccurate or not up to date, you may also request that a correction is made to that information, in which case we will keep a note of the new information you provide against the relevant record and will make any required corrections to the registers.

4.2 To request access to or to make a correction to your personal information please send a request to:

Address: Whittens & McKeough, Level 5, 126 Phillip Street, Sydney NSW 2000 (or the Company's registered address, as amended from time to time).

4.3 We will endeavour to provide you access to your personal information within 7 days of your request. We are entitled to charge a fee for providing such information depending on the nature of the information requested and the time it will take us to collate this information.

4.4 As a shareholder you also have a right to inspect and get a copy of any of the registers kept by us free of charge pursuant to the *Corporations Act 2001* (Cth).

4.5 You can inspect the registers in person at:

Whittens & McKeough, Level 5, 126 Phillip Street, Sydney NSW 2000 (or the Company's registered address, as amended from time to time).

4.6 You can also request a copy of the register by writing to us at:

Whittens & McKeough, Level 5, 126 Phillip Street, Sydney NSW 2000 (or the Company's registered address, as amended from time to time).

4.7 We will provide a copy of the registers within 7 days of your request.

4.8 Please include your name, address and purpose of the inspection in the request. Please note that there are some reasons set out in regulation which are improper reasons for requesting an inspection of or copy of a register, and we will not allow access to the register for an improper purpose. Improper purposes include to solicit a donation or to solicit an investment by a stockbroker, to gather information about the personal wealth of members and to make certain offers or invitations to purchase certain financial products.

### **5 COMPLAINTS**

If you have a complaint with respect to our handling of your personal information in relation to this Privacy Policy or any privacy laws, please advise us of your complaint in writing. Where we receive a genuine complaint, which is not vexatious or frivolous, we will endeavour to investigate the complaint and advise you of any outcome within 45 days of receiving the complaint.

## 6 CONTACT DETAILS

Any communications for the purposes of this policy (including any complaints) may be made by the following means:

Address: Whittens & McKeough, Level 5, 126 Phillip Street, Sydney NSW 2000 (or the Company's registered address, as amended from time to time).

Telephone: (02) 8072 1400 (or the Company's telephone number at its registered address, as amended from time to time).