

SHAREHOLDER PRIVACY POLICY

**EDU Holdings Limited
ACN 108 962 152**

Adopted on 25 February 2022

SHAREHOLDER PRIVACY POLICY

1 INTRODUCTION AND PURPOSE

EDU Holdings Limited ACN 108 962 152 (**Company**) and its subsidiaries (**Group**) takes 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 sets out how the Company collects, uses and discloses personal information obtained from shareholders and their rights attached to their personal information.

2 WHY AND HOW WE COLLECT INFORMATION FROM SHAREHOLDERS

2.1 Why the Company collects personal information

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 the Company 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.

2.2 What personal information does the Company collect?

The personal information the Company collects from shareholders includes the following:

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

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

3 DISCLOSURE OF PERSONAL INFORMATION

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.

In order to achieve the listed purposes, the Company discloses the personal information of shareholders to service providers such as:

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

The Company also discloses personal information of shareholders which forms part of the register when providing access to inspect the registers to any member of the public which the Company is required to do by law.

4 DISCLOSURE OF PERSONAL INFORMATION TO OVERSEAS RECIPIENTS

The Company does not disclose personal information it collects from shareholders to overseas recipients.

5 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.

6 ACCESS TO YOUR PERSONAL INFORMATION

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 personal information that we hold.

This privacy policy extends to the share registry services which are carried out by Automic Pty Ltd (**Automic**). We have appointed Automic under the provisions of the Corporations Act 2001 to manage our register of shareholders. Automic's role as registrar includes but is not limited to keeping an up-to-date record of shares held by shareholders, issuing holding statements and managing corporate actions such as dividend payments, rights issue and share purchase plans. In carrying out registry services, Automic processes personal information about you as a shareholder on our behalf.

To request access to or to make a correction to your personal information held by Automic please send a request to:

Email: hello@automic.com.au; or
lyndon@eduholdings.com.au, the Company Secretary.

Phone: 1300 288 664

If you use any of the apps and engagement tools that we make available to our shareholders (for example the Automic Registries Investor Portal and the Share Trading Site) (**Online Services**), you should be aware of the additional privacy notices which we make available for the relevant Online Service. This privacy policy supplements, but does not override, those notices.

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).

You can inspect the registers in person at:

Level 1, 333 Kent St, Sydney (or the Company's registered address, as amended from time to time).

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

Level 1, 333 Kent St, Sydney (or the Company's registered address, as amended from time to time).

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

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.

7 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, we will endeavour to investigate the complaint and advise you of any outcome within 45 days of receiving the complaint.

8 CONTACT DETAILS

Any communications for the purposes of this policy (including any complaints) may be made by contacting the Company Secretary via email at lyndon@eduholdings.com.au.

9 REVIEW OF POLICY

This policy will be reviewed periodically and updated as required to ensure it remains consistent with current law and practice. The latest version of this policy can be found on the Company's website or obtained from the Company Secretary.

10 MATERIAL REVISIONS

VERSION	APPROVAL DATE	EFFECTIVE DATE	DETAILS
1.0	23 February 2022	25 February 2022	Policy approved by the Board.