

## Privacy Policy Statement

The purpose of this Privacy Policy Statement ('Policy') is to provide you with an explanation of how KeyInvest Ltd and its subsidiaries ('we/our/us') obtains and protects all personal information about individuals. The Policy covers the conditions of our subsequent use of that personal information including its disclosure to third parties.

Our policy in relation to the collection, use and disclosure of personal information is to comply with the National Privacy Principles in the Commonwealth *Privacy Act 1988* ('NPPs').

As a financial services organisation, we have a demonstrable history of securing the privacy of personal information entrusted to us. Over the years, we have implemented and upgraded industry standard systems and procedures thereby ensuring that personal information is correctly recorded, securely stored and appropriately used in accordance with customers' reasonable expectations.

### What personal information is held?

In the normal course of conducting our business, we collect personal information in relation to our:

- Retirement Villages;
- Life Investment Products;
- Lending Services; and
- Lodge Memberships.

That personal information typically includes the customer's name, date of birth, address, contact details, bank account details and payment authorities. We also act as an Agent for other entities in the area of mortgage broking and we collect and retain personal information on behalf of our principals whilst performing this role.

We will only hold personal information that we have been given individual permission to collect.

The specific types of information collected will vary, depending upon the product service or facility chosen by the customer.

### Why is personal information required?

The information requested will be limited to the minimum reasonably required, in our opinion, to enable us to:

- properly process and administer a customer's account;
- to assess an application for a loan or a Retirement Village licence; or
- generally, to conduct our business.

If we are unable to collect this information, the opening or ongoing administration of the relevant account or facility may not be possible.

We will not request information which we believe a reasonable person may regard as being inappropriate, given the type of product, application or service facility involved.

### How will personal information be collected?

We collect most information directly from the customer. This may take the form of:

- completing an application form for various KeyInvest products, services or facilities;
- detail provided by a customer over the telephone or by e-mail;
- detail provided in writing when visiting our website; or
- detail provided in writing by attending our offices.

Information may be collected each time we are contacted by the customer. It may also be collected in our capacity of acting as an Agent for other organisations.

Information may also be collected for us by third parties acting as our Agents. These may be financial planning entities, the staff of joint venture partners, funeral directors or Lodge Secretaries. The information should be obtained initially through applicants completing Application Forms attached to our Disclosure Statements. Generally, these Forms will be collected by the relevant Agent, prior to being forwarded to us for processing.

You should be aware that the Agents may record this information to assist them in servicing you. These Agents may, in some cases, themselves be bound by the NPPs in relation to their use of the information, and it is expected that they will have developed their own privacy policies which extend to covering personal information collected in an agency capacity. In any event, we require Agents (as well as other contractors and service providers that deal with us) to comply with our standard of privacy protection.

At times it may be necessary for us to seek further personal information from third parties. This could involve credit reference or mortgage insurance reports or income tax return and assessment details in relation to a loan application. Customers' separate consent will be obtained in these circumstances.

## How is the information held?

The information may be held in a number of mediums:

- hard copy;
- electronic format; or
- photographic format.

The information may be held at our premises, and at an external storage area operated by service providers contracted by us. Access will be restricted to personnel authorised by us.

## How do we secure the information?

All information is stored in a physically secure environment, regardless of its format. Data transferred over the Internet is protected by a hardware firewall which is constantly updated to ensure that it remains current and effective.

Access is limited to those KeyInvest personnel who require access in order to carry out their designated job functions or to assist us in the conduct of our business.

The ongoing confidentiality of information which our personnel may handle is a condition of their employment.

We may contract some of our administrative responsibilities to third parties unrelated to us. It is a condition of the contract between us and those third parties that the information that we provide to them is used only for the contracted purpose. In addition, we also expect these third parties to be subject to the provisions of the NPPs.

## How will we use the information?

The information collected will be applied for the sole use of KeyInvest and any related bodies corporate for approved business purposes. It will not be passed on to third parties, other than those acting in an agency capacity for us or our contractors and service providers. You should be aware that there may be occasions where KeyInvest is required by relevant industry legislation to disclose personal information to Government or law enforcement agencies, and in some cases disclosure may be required in the public interest, without the consent of the relevant individual.

We will not use personal information for any purpose which is not related to our business operations, for any purpose for which the provider of that information would not reasonably expect us to use such information, or for which we have not obtained the customer's consent (other than the exceptions stated above).

From time to time, the information may be used by us to identify and to provide marketing services and

KeyInvest product information which we believe may be of interest to each such person. We may be contacted at any time by customers to advise they no longer wish to receive this information.

## Use of personal identifiers

We will not use, for our purposes, any Commonwealth Government personal identifiers that you may provide to us, such as a Tax File Number, a Medicare number or a Pension number.

## Access to the information

Upon request, we will provide details of the personal information held about the person making a request, and the purposes for which that information is used. We undertake to use our best endeavours to correct all information which we have been reliably advised is incorrect. We will take reasonable steps to ensure all information held is correct and up to date prior to using it. You should be aware that in some circumstances We may deny a request for access, including:

- when required by law to do so;
- if the request is frivolous or vexatious; or
- when granting access would unreasonably impact upon the privacy of other individuals.

## Complaints

Should you have a complaint, you should address it in writing to our Company Secretary:

Company Secretary  
KeyInvest  
PO Box 3340  
Rundle Mall SA 5000  
Facsimile: 08 8231 4079  
Email: [info@keyinvest.com.au](mailto:info@keyinvest.com.au)

KeyInvest will send you a letter to acknowledge your complaint and let you know how long we expect it will take to resolve.

## Changes to our Privacy Policy

We may periodically update this Privacy Policy Statement in accordance with changes to the law, the industry in which we operate, or the community's changing privacy expectations. We will not advise you of any such amendments. All amendments to our Privacy Policy Statement will be accessible from our website, and copies will be available from us upon request.