

## KeyInvest Privacy Policy – November 2023

KeyInvest Ltd (referred to as 'we/our/us') values and respects the privacy of the individual's we deal with. We are committed to protecting your privacy and complying with the Privacy Act 1988 (Cth) and other applicable privacy laws and regulations.

This Privacy Policy describes how we handle personal information in our possession. Updates to this Privacy Policy may occur, and you can find the latest version on our website or request a copy from us.

### What personal information do we collect and hold?

Personal information is any information that could identify you or be used to establish your identity in the normal course of conducting our business to:

- provide you with our financial services and financial products; or
- recruitment.

The information we collect includes (but is not limited to):

- your identity (such as your name, date of birth, address, email address, telephone number);
- demographic information (such as your gender and marital status);
- financial (such as your account details);
- government identifiers (such as your driver's licence, passport number);
- your professional or association memberships;
- audio-visual information (where applicable and legally permissible, surveillance videos at our premises or recordings of phone or video calls with our staff);
- interactions with us on our website and social media (such as Meta – Facebook); and
- employment details (where applying for a job with us).

### Why is Personal Information Required?

The personal information collected is to enable us to provide you with our products and services, including to:

- issue and administer your product;
- manage your membership with us;
- comply with our regulatory requirements including integrity checks and identity verification;
- improve our products and services we provide; and
- manage your employment application.

If you choose not to provide your personal information we will most likely be unable to provide you with the product or service selected.

### How will personal information be collected?

We will collect personal information directly from you where this is reasonable and practical.

We collect information either when you interact with us online, through our website, subscribe to our mailing list, in person, by telephone or when you apply for a position with us as an employee or contractor. We may also collect your personal information from people authorised by you (including Financial Advisers, Funeral Directors, Power of Attorneys and Lawyers) and parents or guardians in respect of children.

### Unsolicited Information

Sometimes, you may provide information to us that we have not requested. We will determine which information is necessary for us to provide our products or services to you and handle this information in accordance with this Privacy Policy. If the information is not required we will destroy or de-identify it.



## **Sensitive Information**

Sensitive information includes information relating to your racial or ethnic origin, political persuasion, memberships in trade or professional associations or trade unions, sexual preferences and criminal record. It also includes information about your health or medical history.

We will only collect sensitive information with your consent. Unless we are required or permitted by law, we will only use or disclose sensitive information for the purposes for which it is provided.

## **How will we use your personal information?**

From time to time we may share your personal information with other organisations.

The organisations that we might share your personal information with vary according to the product or service involved, but could include:

- Service providers for administrative tasks (such as identity verification, printing and mailing, emailing), information technology and internet based tools applications and marketing activities;
- Individuals explicitly or implicitly authorised by you (such as your Financial Adviser, Funeral Director, Power of Attorney or Lawyer);
- Other financial institutions to process payments and withdrawals from your transaction account;
- Our professional advisers, including our accounting and legal advisers and auditors;
- Third parties to whom we, or our service providers, are legally obliged or authorised to share information, including the issuer or official record holder of identity documents (such as the Australian Prudential Regulation Authority, Australian Securities and Investment Commission, Australian Financial Complaints Authority);
- For employment applicants: referees, recruiters, and employment screening service providers.

## **Sharing Information Outside of Australia**

Some of the third party service providers we disclose personal information to may be based in or have services located outside of Australia – including the United States of America.

Where your personal information is shared to third parties overseas, we will take reasonable steps to ensure that data security and appropriate privacy practices are in place. We will only share personal information to third parties for the purposes set out in this Privacy Policy.

## **Using Government Identifiers**

If we collect government identifiers, such as your Medicare number, we do not use or disclose this information other than required by law. We will not adopt a government identifier in order to identify you for administrative purposes.

## **Direct Marketing**

We may use and disclose your personal information to keep you informed about the range of products and services offered by us. You can opt out of receiving direct marketing information from us at any time by contacting us by telephone, email or in writing.

**How Long is Personal Information Retained?**  
We may be legally required to maintain some of your records for a significant period of time. However, once we believe information is no longer needed we will remove any identifying details or destroy the records entirely.

## **Security of your personal information**

We store most of your information in electronic form and some in paper form.

## **How long is personal information retained?**

We may be legally required to maintain some of your records for a significant period of time. However, once we believe information is no longer needed we will remove any identifying details or destroy the records entirely.



## **Security of your personal information**

We store most of your information in electronic form and some in paper form.

We take a number of steps to protect personal information from misuse, loss, unauthorised access, modification or improper disclosure, including:

- establishing a privacy management plan to outline steps we take to meet our ongoing privacy obligations;
- information security measures for our website and systems;
- physical security measures for access to our premises;
- access security measures by only giving access to personal information to people/ organisations who are authorised to receive that information.

## **Updating your personal information**

We realise that your personal information changes frequently and it is important to us that your information is accurate and up to date. You can update your details by contacting us by telephone, email or in writing.

If we believe your information is incomplete or out of date, we may also seek to correct or complete our records by gathering data from other sources such as public records.

## **Access and correction to your personal information**

You have the right to request access to your personal information in our possession. However, there are situations where we may refuse access, including:

- when granting access could unreasonably impact the privacy of others;
- when providing access would be unlawful, or if denial is mandated by Australian law or a court order;
- when access is likely to interfere with law enforcement activities.

A fee may be charged for the costs of retrieving and supplying the information. If access is denied, we will offer an explanation. If any of your personal information is incorrect, inaccurate, or outdated, you can request correction. We will correct the information if appropriate, and if we refuse, we will provide reasons for not making the correction.

## **Business without identifying you**

If you wish to remain anonymous or use a pseudonym when dealing with us, we may be able to provide you with limited information or services, such as general details about our products.

However, in most cases it will be impracticable for us to assist you if you wish to remain anonymous or use a pseudonym (eg we are not permitted to issue a financial product to a person without collecting and verifying their identity).

## **Resolving your complaints**

If you have any concerns regarding your privacy, confidentiality, or access to personal information, contact us via one of the listed under the "Contact Us" section.

If your privacy complaint relates to a financial service or product, we will handle your complaint in accordance with our Financial Services Internal Dispute Resolution Procedures. Additional details about this process can be found in our Financial Services Complaints Resolution Guide, available upon request or on our website.

## **How can I escalate my complaint?**

If you feel your complaint has not been adequately addressed or is progressing too slowly, you can request to escalate it to our Privacy Officer. If you remain dissatisfied, you have the option to contact one of the following external bodies:

### Financial Services/product complaints

Australian Financial Complaints Authority (AFCA)

Post: GPO Box 3, MELBOURNE VIC 3001

Phone: 1800 931 678 (free call)

Email: [info@afca.org.au](mailto:info@afca.org.au)

Web: [www.afca.org.au](http://www.afca.org.au)

### Privacy complaints

The Office of the Australian Information Commissioner

Post: GPO Box 5218 Sydney NSW 2001

Phone: 1300 363 992

Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

Website: [www.oaic.gov.au](http://www.oaic.gov.au)



Any of these bodies may forward your complaint to another external dispute resolution body if it considers the complaint would be better handled by that other body.

### **Privacy and the Internet**

This section explains how we handle personal information collected from our website.

### **Visiting our website**

Whenever you access an unsecured section of our website, meaning a public page without requiring login, we gather information about your visit, including:

- the time and date of your visit;
- any downloaded information or documentation;
- your browser type; and
- internet protocol details of the device used to access the site.

Our website features calculators that may prompt you to enter personal details; if you save this data, it may be stored.

### **Cookies**

A "cookie" is a small text file placed on your internet browser, accessed each time you visit our website. For secured pages requiring login, we use cookies for security and personalisation. For unsecured pages, we use cookies to gather information on website usage. Adjusting your browser settings to reject cookies may impact access to secured pages.

### **Emails**

Upon receiving emails, we retain the email content and our response when necessary. Your email address is used or disclosed only for the provided purpose and won't be used otherwise without your consent.

### **Security**

Our website employs current security measures to safeguard your personal information. Data containing personal details transmitted over the internet is encrypted. However, we cannot guarantee complete security for information transmitted via the internet; use our website at your own risk.

### **Links to Third-Party Websites**

Our website may contain links to third-party sites. This Privacy Policy does not apply to external websites. To understand how third parties, handle your information, you will need to obtain a copy of their privacy policy.

### **Website Analytics**

We use website analytics software to track traffic patterns, survey users anonymously, and collect non-personal information like the number of unique visitors and their website interactions. This data is aggregated by third-party software to assist in website analysis, ensuring your personal information remains unidentified and not stored.

### **Contact us**

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