

1 K R SECURITIES PTY LTD PRIVACY POLICY

K R Securities Pty Ltd abides by the Australian Privacy Principles established under the Privacy Amendment (Enhancing Privacy Protection) Act 2012. A summary of the Australian Privacy Principles is available at our office.



As a superannuation fund administrator and financial planning organisation we are subject to certain legislative and regulatory requirements which necessitate us obtaining and holding detailed information which personally identifies you and/or contains information or an opinion about you (“personal information”). In addition, our ability to provide you with a comprehensive financial planning and advice service is dependent on us obtaining certain personal information about you, including:

- I. employment details and employment history;
- II. details of your financial needs and objectives;
- III. details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, insurance cover and superannuation;
- IV. details of your investment preferences and aversion or tolerance to risk;
- V. information about your personal circumstances, family commitments and social security eligibility;
- VI. tax file numbers and other identifying information both personal and for related entities

Failure to provide the personal information referred to above may expose you to higher risks in respect of the recommendations made to you and may affect the adequacy or appropriateness of advice we give to you.

As we are required pursuant to the Corporations Act and Rules of Professional Conduct of the Financial Planning Association of Australia to collect sufficient information to ensure appropriate advice can be given in respect of recommendations made to our clients, if you elect not to provide us with the personal information referred to above, we may elect to terminate our retainer with you if we believe we are unable to provide you with a complete service.

2 INFORMATION ABOUT OUR COLLECTION POLICIES.

- I. We will not collect any personal information about you except when you have knowingly provided that information to us or authorised a third party to provide that information to us.
- II. Generally collection of your personal information will be effected in either face to face interviews, emails, letter, fax or over the telephone. From time to time additional and/or updated personal information may be collected through one or more of those methods.
- III. We will only collect, maintain and use Personal Information about you if it is necessary for us to adequately provide to you the services you have requested including:
 - a. the preparation of your financial plan;
 - b. the provision of financial planning advice to you;
 - c. making securities and investment recommendations;
 - d. reviewing your financial plan;
 - e. reviewing securities and investment recommendations;
 - f.other

3 DETAILS OF HOW WE INTEND TO USE INFORMATION COLLECTED FROM YOU AND OUR DISCLOSURE POLICIES.

- I. We will not use or disclose Personal Information collected by us for any purpose other than:
 - a. the purposes for which it was provided or secondary related purposes in circumstances where you would reasonably expect such use or disclosure; or
 - b. where you have consented to such disclosure; or
 - c. where the Australian Privacy Principles authorise use or disclosure where required or authorised under law, in circumstances relating to public health and safety and in connection with certain operations by or on behalf of an enforcement body.
- II. We are required under the Rules of Professional Conduct of the Financial Planning Association of Australia to make certain information available for inspection by the Association on request to ensure ongoing compliance with mandatory professional standards. This may involve the disclosure of your personal information. We are also

obliged pursuant to the Corporations Act to maintain certain transaction records and make those records available for inspection by the Australian Securities and Investments Commission.

- III. We may use the personal information collected from you for the purpose of providing you with direct marketing material such as articles that may be of interest to you, however you may, by contacting us by any of the methods detailed below, request not to receive such information and we will give effect to that request. Please allow 2 weeks for your request to be actioned.
- IV. We may disclose your Personal Information to superannuation fund trustees, insurance providers, and product issuers for the purpose of giving effect to your financial plan and the recommendations made by us provided you have consented to the implementation of those recommendations.
- V. In order to ensure that you receive a personal and tailored service, your Personal Information may be transferred to one of our agents or authorised representatives who will be your primary point of contact with the organisation. It is a condition of our agreement with each of our representatives that they adopt and adhere to this privacy policy. You can be assured that your information will be maintained by any agent or representative in accordance with this policy. If you have any concerns in this regard, you should contact us by any of the methods detailed below.
- VI. We may disclose your personal information to external contractors (only with your approval) for the following purposes:
 - a. To effect Insurance cover
 - b. To purchase or sell shares
 - c. To address investment issues
 - d. To assist you with tax returns
 - e. To assist you with loan or credit applications
 - f. In the event that we propose to sell our business we may disclose your personal information to potential purchasers for the purpose of them conducting due diligence investigations. Any such disclosure will be made in confidence and it will be a condition of that disclosure that no personal information will be used or disclosed by them. In the event that a sale of our business is effected, we may transfer your personal information to the purchaser of the business. As a client you will be advised of any such transfer.

It is a condition of our agreement with each of our external contractors that they adopt and adhere to this privacy policy. You can be assured that your information will be maintained by any contractor to whom it is disclosed in accordance with this policy. If you have any concerns in this regard, you should contact us by any of the methods detailed below.

4 INFORMATION RELATING TO HOW WE STORE YOUR INFORMATION AND ABOUT OUR SECURITY POLICIES AND PRACTICES.

- I. Your personal information is generally held in your client file. Information may also be held in a computer database (whether domiciled in Australian or overseas).
- II. We will at all times seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure. At all times your personal information is treated as confidential and any sensitive information is treated as highly confidential. Access to our premises is controlled by allowing only personnel with keys to access the premises. All computer based information is protected through the use of access passwords on each computer and for individual programs/services where such data is stored. Data is backed up on a continuous basis on offsite servers.
- III. In the event you cease to be a client of this organisation, any personal information which we hold about you will be maintained in a secure off site storage facility for such period as required to comply with legislative and professional requirements, following which time the information will be completely destroyed or deleted.
- IV. It is not our intention to disclose your personal information to persons or entities overseas without your explicit approval.

5 HOW CAN YOU GAIN ACCESS TO YOUR PERSONAL INFORMATION?

- I. You may at any time, by contacting us by any of the methods detailed below, request access to your personal information and we will (subject to the following exceptions) provide you with access to that information either by providing you with copies of the information requested, allowing you to inspect the information requested or providing you with an accurate summary of the information held. We will, prior to providing access in accordance with this policy, require you to provide evidence of your identity.
- II. We will **not** provide you access to personal information which would reveal any confidential formulae or the detail of any in house evaluative decision making process, but may instead provide you with the result of the formulae or process or an explanation of that result.
- III. We will **not** provide you with access to your personal information if:
 - a. providing access would pose a serious threat to the life or health of a person;
 - b. providing access would have an unreasonable impact on the privacy of others;

- c. the request for access is frivolous or vexatious;
- d. the information related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings;
- e. providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations;
- f. providing access would be unlawful;
- g. denying access is required or authorised by or under law;
- h. providing access would be likely to prejudice certain operations by or on behalf of an enforcement body or an enforcement body requests that access not be provided on the grounds of national security.

In the event we refuse you access to your personal information, we will provide you with an explanation for that refusal.

6 ACCESS AND INFORMATION UPDATE AND CORRECTION OF INFORMATION POLICIES AND PROCEDURES.

- I. We will endeavour to ensure that, at all times, the personal information about you which we hold is up to date and accurate. In the event that you become aware, or believe, that any Personal Information which we hold about you is inaccurate, incomplete or outdated, you may contact us by any of the methods detailed below and provide to us evidence of the inaccuracy or incompleteness or out datedness and we will, if we agree that the information requires correcting, take all reasonable steps to correct the information.
- II. If we do not agree that your personal information requires correcting, we must, if you request, take reasonable steps to ensure that whenever your personal information is accessed or handled in the future, it is apparent that you are not satisfied as to the accuracy or completeness of that information.
- III. We will endeavour to respond to any request for access within 14-30 days depending on the complexity of the information and/or the request. If your request is urgent please indicate this clearly.

7 HOW YOU CAN MAKE A PRIVACY COMPLAINT.

If you wish to complain about any breach or potential breach of this privacy policy or the Australian Privacy Principles , you should contact us by any of the methods detailed below and request that your complaint be directed to the Privacy Officer. Your complaint will be considered within 7 days and responded to. It is our intention to use our best endeavours to resolve any complaint to your satisfaction, however, if you are unhappy with our response, you are entitled to contact the Office of the Privacy Commissioner who may investigate your complaint further.

CONTACT DETAILS

Privacy Officer Nathan Baker

Address: *8/88 Boundary Street West End Q 4101*

Telephone: *07 3844 4322*

Facsimile: *07 3844 8992*

e-mail: *nathan@krsecurities.com*