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This document outlines KeyInvest's ('we/our/us') policy on handling personal information.

We are committed to abiding by the Australian Privacy Principles (APPs) for the protection of personal information, as set out in the Privacy Act 1988 (Cth).

### What Personal Information does KeyInvest 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 we collect personal information in relation to our:

- retirement villages;
- financial services and products;
- Lodge Memberships; and
- recruitment.

The information we collect includes (but is not limited to) your name, date of birth, address, contact details, bank account details, health information and employment details.

### Why is Personal Information Required?

The personal information collected is to assist us in providing you with our products and services. This allows us to:

- process and administer your Financial Services or Lodge account;
- administer your Retirement Village Residence Contract; or
- 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 fill out a form or when you contact us by telephone or email.

We may also collect your personal information from people authorised by you (eg Financial Advisers, 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 Keyinvest 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:

- administrative service providers for identity verification, printing, mailing and information technology;
- accounting/legal service providers;
- anyone authorised by you either expressly or impliedly (including Financial Advisers, Power of Attorneys and Lawyers);
- anyone to whom we, or our service providers, are required or authorised by law to provide information to including the Issuer or Official record holder of identity documents (eg Australian Prudential Regulatory Authority, Australian Securities and Investment Commission);
- organisations that provide products or services used or marketed by us; or for employment candidates;
- referees, recruiters and employment screening service providers.

### Sharing Information Outside of Australia

We will not disclose your personal information to organisations overseas.

### 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 KeyInvest. These products and services may include life insurance products, retirement services and lending services.

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 information in paper and electronic form. We take a number of steps to protect personal information from misuse, loss, unauthorised access, modification or improper disclosure, including:

- security measures for access to our systems; and
- 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

Under the Privacy Act you have the right to request access to personal information we hold about you. However, we are permitted to refuse access in certain situations, including where:

- giving access would have an unreasonable impact on the privacy of other individuals;
- giving access would be unlawful, or where denying access is required or authorised by an Australian law or a court order;
- giving access is likely to interfere with law enforcement activities.

We may charge a fee for our costs of retrieving and supplying the information to you.

If we deny access to your personal information we will provide you with an explanation.

If any of the personal information we hold about you is incorrect, inaccurate or out of date you may request that we correct the information. If appropriate we will correct your information. If we refuse to correct personal information we will provide you with our reasons for not correcting the information.

### 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 Privacy Complaints

If you have any questions or concerns about your privacy, confidentiality or access to your personal information, contact us via one of the methods listed under the "How to Contact KeyInvest". Once a complaint has been lodged, we will respond to you as soon as possible.

### For Financial Services / Products Complaints

If your privacy complaint relates to a financial service/ product we will handle your complaint in accordance with our Financial Services Internal Dispute Resolution Procedures. Our Financial Services Complaints Resolution Guide provides more detail on this process and a copy is available on request or from our website [www.keyinvest.com.au](http://www.keyinvest.com.au).

### For Retirement Village Residents'

We will handle any privacy complaints relating to the personal information of residents, in accordance with you're the Dispute Resolution Policy of the relevant Residence Contract.

### How can I Escalate my Complaint?

If you feel your complaint has not been satisfactorily addressed in the first instance or that it is taking too long to resolve, you can ask for your complaint to be escalated to KeyInvest's Privacy Officer.

If you are still not satisfied, you can contact 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

Anytime you access an unsecured part of our website, that is, a public page that does not require you to log on, we will collect information about your visit, such as:

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

Our website also includes a number of calculators, which may require you to enter your personal details. If you save the data you enter on the calculator, this information will be stored.

### Cookies

A "cookie" is a small text file which is placed on your internet browser and which we may access each time you visit our website. When you visit the secured pages of our website (ie pages that you have to provide login details to access) we use cookies for security and personalisation purposes. When you visit the unsecured pages of our website (ie public pages that you can access without providing login details) we use cookies to obtain information about how our website is being used.

You may change the settings on your browser to reject cookies, however doing so might prevent you from accessing the secured pages of our website.

### Email

When we receive emails, we will retain the content of the email and our response to you where we consider it necessary to do so. Your email address will only be used or disclosed for the purpose for which it was provided. It will not be added to any mailing lists or used for any other purpose without your consent.

### Security

We use up-to-date security measures on our website to protect your personal information. Any data containing personal or related information which we transmit via the internet is encrypted. However, we cannot guarantee that any information transmitted via the internet by us, or yourself, is entirely secure. You use our website at your own risk.

### Links on our Website

Our website may contain links to third party websites. The terms of this Privacy Policy do not apply to external websites. If you wish to find out how any third parties handle your personal information or credit information, you will need to obtain a copy of their privacy policy.

### Website Analytics

Website analytics measurement software is used by KeyInvest to assist in tracking traffic patterns to and from our website, anonymously surveying users of the sites. The system is used to collect information such as the number of unique visitors, how long these visitors spend on the website when they do visit, and common entry and exit points into and from the website.

This non-personal information is collected and aggregated by third party software and provided to us to assist us in our analysis of our website. You cannot be identified personally from this information and no personal information is stored about you.

## Keyinvest's Privacy Policy

Any personal information we hold is governed by the most current KeyInvest Privacy Policy.

You can access the Policy via our website [www.keyinvest.com.au](http://www.keyinvest.com.au) or you can contact us about obtaining a copy.

This Privacy Policy:

- is reviewed from time to time to take account of new laws, technology and to make sure it remains appropriate to our operating environment; and
- applies to all entities within the KeyInvest Group except for Australian Associated Advisers Pty Ltd trading as KeyInvest Lending Services who have adopted their own Privacy Policy.

## How to Contact Keyinvest

You can contact us to:

- seek more information about anything contained in this Policy, or to request a copy of this Policy in a different format;
- update or correct your personal information;
- opt out of receiving direct marketing information;
- ask about accessing or correcting the personal information we hold about you; or
- make a privacy related complaint.

You can contact us by any of the following methods:

- In writing: PO Box 3340 Rundle Mall SA 5000
- By telephone: 1300 658 904
- By email: [info@keyinvest.com.au](mailto:info@keyinvest.com.au)