



# Privacy Policy

28 February 2024

Responsible Entity & Investment Manager  
Keystone Capital Limited  
ACN 163 616 064 AFS Licence No 439327

[keystonecapital.com.au](https://keystonecapital.com.au)

# Privacy Policy

This policy outlines our ongoing obligations to you in respect of how Keystone Capital Ltd manage your Personal Information. Please read this Privacy Policy carefully before using this website. Usage of this website is conditional upon you agreeing to be bound by this Privacy Policy.

This Privacy Policy seeks to comply with the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Commonwealth of Australia). The APPs govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information. A copy of the APPs may be obtained from the website of The Office of the Australian Information Commissioner at <https://www.oaic.gov.au/>

## What is Personal Information and why do we collect it?

Personal information includes a broad range of information, or an opinion, that could identify an individual. Personal information may include:

- › an individual's name, signature, address, phone number or date of birth
- › sensitive information
- › credit information
- › employee record information
- › photographs
- › internet protocol (IP) addresses
- › voice print and facial recognition biometrics (because they collect characteristics that make an individual's voice or face unique)
- › location information from a mobile device (because it can reveal user activity patterns and habits).

This Personal Information is obtained in many ways including correspondence conducted by telephone, by email, via this website and from third parties. We are not responsible for website links or policy of third parties as we have no control over those parties.

We collect your Personal Information for the primary purpose of our designated services. We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure. You may unsubscribe from our marketing communications at any time electronically, or by contacting us in writing.

## Sensitive Information

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

- › Sensitive information will be used by us only:
- › For the primary purpose for which it was obtained;
- › For a secondary purpose that is directly related to the primary purpose;
- › With your consent; or where required or authorised by law.

## Third Parties

Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances we may be provided with information by third parties. If you don't want us to do this, you may contact us in writing at any time, as noted above.

## Disclosure of Personal Information

Your Personal Information may be disclosed in a number of circumstances including the following:

- › Where required or authorised by law; and
- › Third parties where you have consented to the use or disclosure.

## Security of Personal Information

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorised access, modification or disclosure.

## Access to your Personal Information

You may access the Personal Information we hold about you to update or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us in writing. To protect your Personal Information we may require identification from you before releasing the requested information.

## Maintaining the Quality of your Personal Information

We will take reasonable steps to make sure that your Personal Information is accurate, complete and up-to-date. If you find that the information we have is not current or is inaccurate, please advise us as soon as practicable so we can update our records.

## Policy Updates

This Policy may change from time to time and is available on our website.

## Privacy Policy Complaints and Enquiries

If you have any queries or complaints about our Privacy Policy please contact us at:

**Address:** Level 6 74 Pirie Street, Adelaide SA 5000

**Phone:** 08 7231 8777

**Email:** admin@keystonecapital.com.au