

1. PRIVACY POLICY STATEMENT

a. Our Commitment

At Kennas, we recognize that your privacy is very important to you – it is to Kennas as well. We handle personal information by and about people every day.

We are bound by, and committed to supporting, the *Australian Privacy Principles* (APS) set out in the *Privacy Amendment (Enhancing Privacy Protection) Act 2012*. Our aim is to both support, and ensure that we comply with the APPs that form the basis of laws introduced to strengthen privacy protection for the general public. The information set out below is largely a summary of our obligations under the APPs.

We believe that this Statement will address any potential concerns you may have about how personal information you provide to Kennas is collected, held, used, corrected, disclosed and transferred. You can obtain more information on request about the way we manage the personal information we hold. If you seek any further information, please contact us in one of the ways set out below.

In this Statement, 'Kennas', 'we', 'us' and 'our' is a reference to the Kennas partnership, Kennas Financial Services Pty Ltd and Kimore Pty Ltd.

The statement does not apply to personal information collected by Kennas that is exempted under the Privacy Act, for example employee records.

b. Personal Information

By personal information we mean information or an opinion about a person whose identity is apparent or can reasonably be ascertained. The types of information we collect includes information about you which is relevant to our relationship or the service you are enquiring about or the professional services we provide to you.

Typically this information includes:-

- names, addresses, telephone numbers and e-mail addresses;
- information in identification documents (passport, drivers licence, medicare card);
- tax file numbers and other government-issued identification numbers;
- date of birth and gender;
- bank account details, shareholdings and investment details;
- details of your liabilities (both actual and potential);
- superannuation details;
- insurance details;
- educational qualifications, employment history, job titles and salary;
- details of your financial needs and objectives;
- details of your investment preferences and aversion or tolerance to risk;

- visa or work permit status;
- information about your personal circumstances, family commitments and social security eligibility; and
- personal information about your spouse and dependants.

It may be necessary to collect sensitive information about you in order to provide specific services. The types of sensitive information that be collected include professional memberships, ethnic origin, criminal record and health information.

c. Collection

In the course of our activities, we collect and hold personal information. However, we will only collect personal information from you that is necessary, and by lawful and fair means, without being unreasonably intrusive.

Where reasonable and practicable, we will only collect personal information about you, from you. The information is collected when we deal with you in person or over the phone, when you send us correspondence (including email), when you complete a questionnaire, form or survey, or when you subscribe to our publications.

Sometimes we may need to collect your personal information from a third party, such as your employer when they are our client, from your personal representative, financial institutions, other professional advisers, government bodies or from a publicly available record. We will take reasonable steps to obtain your consent before doing so.

In some circumstances, such as where we rely on publicly available information to update your contact details, you may not be aware that we have collected information about you. We will take reasonable steps to let you know that we have your personal information, unless it is obvious from the circumstances that you know or would expect us to have the information. Reasonable steps may include asking the person who gave us the information to let you know that we have that information.

We may also collect information about you from your use of our website and information you provide through contact mailboxes or through the registration process on our websites.

Wherever it is lawful and practicable, we will give you the option of not identifying yourself or not providing personal information when entering into transactions with us. However, failure to provide full and complete information we request may mean that we are unable to provide services to you fully and properly. Once we hold personal information, we will take reasonable steps to keep it accurate, complete and up-to-date.

d. Third Party Information

You should only provide us with someone else's personal information when you have their authority or consent to provide it. You should also take reasonable steps to inform them of the matters set out in this Privacy Policy.

e. Use of information

We will only use your personal information for the main purpose we told you it was needed for or secondary related purposes in circumstances where you would reasonably expect such use. These purposes include:-

- the provision of professional services
- responding to your requests or queries
- maintaining contact with our clients and other contacts
- keeping our clients and other contacts informed of our services and industry developments
- notifying our clients and other contacts of seminars and other events
- administrative and operational tasks
- developing and marketing services
- systems development and testing
- recruitment purposes
- training our staff
- meeting regulatory obligations
- seeking feedback, including conducting surveys
- engaging third party service providers for business purposes
- any other business related purposes.

f. Disclosure of Information

We do not routinely disclose personal information to other organisations unless:

- required by law, regulation or professional body requirement;
 - use or disclosure is permitted by this policy;
 - it is necessary to provide you a service you have requested;
 - it is necessary on health or public safety grounds to use the personal information for another purpose;
 - required as part of an actual or proposed sale or transfer of all or part of Kennas' assets or operations;
- or
- you give your consent

In order to fulfill the purposes set out above, it may be necessary to provide access to your personal information to third parties with whom we have a business relationship. The types of third parties to whom we may disclose your personal information include:

- experts or other third parties contracted as part of an engagement;
- our service providers, including but not limited to mail houses, debt collecting agencies, web site hosts, electronic database managers, benchmarking service providers, insurers, auditors or event managers;
- our professional advisers;
- professional bodies of which Kennas is a member such as Financial Planning Association of Australia and the Institute of Chartered Accountants of Australia;
- as part of an engagement, if you are a customer, an employee, a contractor or supplier to one of our clients, then we may disclose your information as part of providing our service to our client;
- government or regulatory bodies or agencies, as part of an engagement or otherwise.

We may also share non-personal, de-identified and aggregated information for research or operational purposes. Except as set out in this policy we do not sell or trade personal information to third parties, or allow such third parties to use that personal information.

g. Exchange of Information Within the Group

We may also exchange information between members of the Kennas group, including the Kennas partnership, Kennas Financial Services Pty Ltd and Kimore Pty Ltd.

h. Sending Data Overseas

Your personal information may be sent overseas in order to provide a service you have requested. The countries to which such disclosures are made and types of personal information disclosed are dependent on the specific circumstances of the engagement.

We may also transfer your information overseas for storage with third party service providers. The data may be located in USA, New Zealand, Singapore.

Any such transfer does not change any of our commitments to safeguard your privacy and the information remains subject to existing confidentiality obligations.

i. Access and Correction

If you ask, we will tell you what personal information we hold about you, and what we do with it, subject to some limited exceptions permitted or required by law. Such request must be made in writing to our Privacy Officer.

We will facilitate access to you by allowing an inspection of your personal information in person, or by providing copies or a summary of relevant documents, depending on what is most appropriate in the circumstances, following receipt of your request. Any charge we make for providing access will be reasonable.

If you can show us that the personal information is inaccurate, incomplete, not up-to-date, irrelevant or misleading, we will take reasonable steps to correct it. Note that we need not to provide access to personal information in several types of situations, for example where a request is frivolous, or where to provide access would pose a threat to health or public safety, unreasonably interfere with another person's privacy, or be a breach of the law. If we refuse access we will advise you of our reasons for doing so.

j. Security

We will take reasonable steps to protect personal information from misuse and loss, and destroy or permanently de-identify personal information we no longer need. The information may be stored electronically or in hard copy form, on site or backed up offsite. The security measures we employ to protect your personal information include physical (only personnel with keys are allowed unsupervised access to the premises) and technological measures (access passwords on each computer and for individual programs/ services where data is stored, fire wall protection).

In the event you cease to be a client of this organization, any personal information which we hold about you will be maintained for such period as required to comply with legislative and professional requirements, following which time the information will be destroyed.

k. Identifiers

We will not adopt as our own any identifiers that you may provide to us, such as Tax File Numbers, Medicare numbers etc.

I. Direct Marketing

We may use your personal information for the purpose of marketing our services. If you do not want to receive marketing material from us, you can contact us by:

- clicking on the unsubscribe function in our electronic communications; or
- through our contact details below.

m. Internet Web Site

It is our usual practice to collect statistical information about all our visitors to our online resources. That information is very limited and only used to identify generic behavioural patterns. We record this data to maintain our server and improve our services. We do not use it to personally identify anyone.

Cookies may be used on some areas of our websites . Most browsers permit you to opt out of receiving cookies. They are used to improve the navigational experience of visitors to our website and to make them easier to use. If you choose to opt out you may not be able to access some of the advanced functions of the web site.

In addition we may ask you to provide personal information to us directly when applying to receive information about our services, events and industry updates or wish to apply for a job.

We provide a number of links on our website to websites operated by third parties. These sites are hosted and managed by organisations other than ourselves. Before deciding if you want to contribute to any third party site you should read their privacy policy.

n. Complaints Resolution

We are committed to providing clients whose personal information we hold, a fair and reasonable system for the handling of their complaints.

If at any time you have any complaints in relation to privacy, please contact our Privacy Officer at one of the points referred to below. We will seek to address any concerns that you have through our complaints handling processes. We will endeavour to respond to your complaint within 30 days. If you wish to take matters further you may refer your concerns to the Office of the Australian Information Commissioner.

o. Contact Us

If you seek any further information from Kennas about this Statement or our privacy policy generally, please contact our Privacy Officer.

Contact Details

Address: The Privacy Officer
 5th Floor Capricornia Electricity Centre
 37 Fitzroy Street
 (PO Box 201)
 Rockhampton Qld 4700

Telephone: 07 4924 9100
Facsimile: 07 4922 2374

Email: kennas@kennas.com