

KIN GROUP PTY LTD

PRIVACY POLICY

1. Purpose of this policy

The Group respects the privacy of the personal information you may provide to it when it deals with you. The way the Group manages your personal information is governed by the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**) established under the Privacy Act.

For the purposes of this Privacy Policy, "personal information" has the meaning given to it in the Privacy Act, which is information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information is true or not, and whether the information or opinion is recorded in a material form or not. Examples of personal information include an individual's name, address, telephone number and date of birth.

This Privacy Policy explains how the Group handles any personal information it holds about you. Please note that this Privacy Policy is to be read subject to any overriding provisions of law or contract.

In this Policy, the Group includes Kin Group Pty Ltd and its wholly owned subsidiaries, together with any related entities who adopt this Policy from time to time.

2. Collecting personal information

2.1 What kinds of personal information does the Group collect?

The kinds of personal information the Group may collect include but are not limited to:

- your full name (current and former (if any)) and date of birth;
- your personal and business contact details (including your address, landline or mobile telephone numbers, fax number and e-mail address);
- your employment details (including your company name, job title and business sector);
- banking and tax details (including your tax file number and ABN if applicable);
- personal information provided when you commence a business relationship with us;
- personal information provided if you seek employment with us;
- contact and identification details of any third party whom you have authorised to negotiate or provide your personal information on your behalf (including any agents or attorneys appointed by you under a power of attorney);
- any correspondence between you and us; and
- any other personal information provided to us when you make an inquiry, request information, correspond with us or lodge a complaint.

2.2 How does the Group collect personal information?

Where possible, the Group always try to collect personal information directly from you, for example when you:

- request information or contact the Group through its website (for example, by telephone, in writing or emails);
- provide the Group your contact details, business card or documents containing your personal information (such as contracts, forms or public records or identification information for the

- purposes of confirming your identity or conducting "know your customer" checks under the Anti-Money Laundering and Counter Terrorism Financing Act 2006 (Cth)); or;
- meet with the Group in person.

The Group may also obtain your personal information from third parties it deals with, such as:

- its related bodies corporate;
- the companies it invests in;
- your business partners;
- its professional advisers (for example, its insurers, auditors, lawyers, accountants and consultants);
- your authorised agents or attorneys;
- any other organisation with whom the Group does business; and
- with your consent (express or implied) – other entities.

Where the Group collects personal information from third parties you refer to it, it will assume, and you will ensure, that you have made that third party aware of the referral and the purposes of collection, use and disclosure of the relevant personal information.

2.3 Dealing with the Group anonymously

For certain transactions, you have the option of dealing with the Group anonymously or by using a pseudonym (for example, if you contact the Group asking for general information). However, it is generally not possible for the Group to enter into a business relationship or carry out commercial transactions with you without your personal information.

3. Why does the Group collect, hold, use and disclose your personal information?

The Group collects, uses and discloses your personal information to carry out its commercial activities, operations and to provide the services, products and information you request.

In particular, the Group may collect, use and disclose your personal information so that it can:

- respond to your requests or inquiries and provide you with any publications, information or other services requested by you;
- assess your application for employment;
- maintain and administer your business or other relationship with it (for example, updating and maintaining its records);
- communicate with you during the course of your business or other relationship with it;
- administer, support, improve and develop its business activities and services;
- notify you about important changes or developments to its functions, activities or website;
- carry out any other activities which relate to or arise out of any requests made by you;
- if you lodge a complaint with it - process and respond to your complaint;
- do anything which you authorise or consent to it doing; or
- take any action it is required or authorised by law to take.

If you do not provide the Group with your personal information, it may not be possible for it to carry out these functions and activities.

4. Disclosing your personal information

The Group may disclose your personal information to:

- its related bodies corporate;
- its business partners and service providers (such as contractors who provide website, IT, marketing, administration and other services to support it);
- suppliers it engages for data processing and other administrative and support functions;
- its professional advisers (for example, its insurers, auditors, lawyers, accountants and consultants);
- your authorised agents or attorneys;
- financial institutions (for payment processing);
- any entity to whom it is required or authorised by law to disclose your personal information (for example, the Australian Taxation Office, law enforcement agencies and government and regulatory authorities such as AUSTRAC); and
- with your consent (express or implied) - other entities.

The above entities may in turn disclose your personal information to other entities as described in their respective privacy policies or notices.

5. Dealing with the Group online

This Privacy Policy applies to your use of the Group's website and any personal information that you may provide to it via its website.

When you visit the Group's websites, the Group and/or its contractors may collect certain information about your visit. Examples of such information may include:

- **Cookies** – Cookies are small amounts of information which the Group may store on your computer (after you register on the Group's website) to enable the Group's server to collect certain information from your web browser. Cookies in themselves do not identify the individual user, just the computer used. Cookies and other similar technology make it easier for you to log on to and use the website during future visits. It also allows the Group to monitor website traffic, to identify you when you visit this website, to personalise the content of the website for you and to enable you to both carry out transactions and have access to information about your account. Cookies only record which areas of the site have been visited by the computer in question, and for how long. Allowing the Group to create a cookie does not give the Group access to the rest of your computer and the Group will not use cookies to track your online activity once you leave its site. Cookies are read only by the server that placed them, and are unable to execute any code or virus; and
- **Site visit information** – the Group collects general information about your visit to its website. The information the Group collects is not used to personally identify you, but instead may include your server address, the date and time of your visit, the pages you accessed and the type of internet browser you use. This information is aggregated and used for the purposes of system administration, and to prepare statistics on the use of the Group's website.

The Group's websites may contain links to other websites which do not belong to it and are not covered by this Privacy Policy. If you access other websites using the links provided, the operators of these websites may collect information from you which will be used by them in accordance with their privacy policy, which may be different from the Group's.

6. Data storage, retention, security and location of your personal information

The Group will take reasonable steps to protect your personal information from loss, misuse, interference, unauthorised access, modification or disclosure. The Group may store your personal

information in different forms, including in hardcopy and electronic form. We have implemented policies, procedures and systems to keep your personal information secure.

The Group may be required by law to retain certain information for a set period of time. Once this period of time expires, or the Group no longer needs to hold your personal information, it will take reasonable steps to destroy, delete or de-identify your personal information in a secure manner.

7. Overseas disclosure of personal information

The Group may disclose your personal information for the purpose of complying with FATCA which may be located in overseas countries, including United States of America and New Zealand.

Where the Group discloses your personal information to an entity located overseas, it will take reasonable steps to ensure that the overseas recipient of your personal information handles your personal information in accordance with the Privacy Act.

8. Access and correction

To effectively conduct business with you, it is important that the personal information the Group holds about you is complete, accurate and current. At any time while the Group holds your personal information, it may ask you to tell it of changes to your personal information.

8.1 Correcting personal information

You can request the Group to update or correct your personal information if you believe that the personal information it holds about you is inaccurate, out-of-date, incomplete, irrelevant or misleading or otherwise needs to be corrected or updated. The Group's contact details are provided below. The Group will respond to a request to correct your personal information within a reasonable period after the request is made.

If the Group refuses to correct your personal information, you may request that it associates with the information a statement that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading.

8.2 Accessing your personal information

You can also request access to the personal information the Group holds about you by contacting it using the details provided below. The Group will respond to a request for access within a reasonable period after the request is made, either by giving you access to the personal information requested, or by notifying you of its refusal to give access.

The Group will not charge you an application fee for making a request to access the personal information it holds about you or for making any corrections to your personal information. However, the Group may charge a reasonable fee to cover its costs of providing you with access to your personal information, for example, if you make multiple requests for information, where your request relates to a large volume of information, or the Group incurs third party costs in providing you with access.

The Group may request to verify your identity before responding to any request. If the Group decides not to provide you with access to or correct your personal information, it will give you reasons for its decision.

9. Lodging a complaint

If you have a complaint about how the Group handles your personal information (including how it dealt with any requests to correct or access your personal information), please contact it at the contact details below.

Please note that the Group may ask you to lodge your complaint in writing.

The Group will acknowledge receipt of your complaint as soon as possible after receiving your complaint in writing. The Group will investigate your complaint and provide you with a response within a reasonable timeframe.

If you are not satisfied with how your complaint is handled, then you can lodge a formal complaint with the Office of the Australian Information Commissioner at:

- Telephone: 1300 363 992 (if calling from outside Australia including Norfolk Island please call: +61 2 9284 9749)
- National Relay Service: o TTY users phone 133 677 then ask for 1300 363 992
- Speak and Listen users phone 1300 555 727 then ask for 1300 363 992
- Internet relay users connect to the National Relay Service then ask for 1300 363 992
- Post: Office of the Australian Information Commissioner, GPO Box 5218, SYDNEY NSW 2001
- Fax: +61 2 9284 9666
- Email: enquiries@oaic.gov.au
- Website: <http://www.oaic.gov.au/privacy/making-a-privacy-complaint>

10. Contacting the Group

If you wish to contact the Group regarding its handling of your personal information or any of the matters covered in this Privacy Policy, please contact the Privacy Officer:

- by post at: PO Box 6265, South Yarra, Victoria 3141
- by phone: 03 8825 5705
- by email: kinfolk@kingroup.com.au

The Group welcomes your questions and any suggestions you may have about its Privacy Policy.

11. Changes to this Policy

The Group reserves the right to revise or supplement this Privacy Policy from time to time. The updated version of this Privacy Policy will be posted on our website www.kingroup.com.au and will be effective from the date of posting.

This Privacy Policy was last updated on 12 April 2017.