



# PRIVACY POLICY

Protection of your personal information is important to us at Stronghold Investment Management Pty Limited (“Stronghold”). We are committed to respecting your right to privacy and protecting your personal information. This policy has been drafted having regard to our obligations under the Privacy Act 1988 (including the National Privacy Principles) and Privacy Amendment (Enhancing Privacy Protection) Act 2012.

The information we collect

Whenever it is reasonable and practicable to do so, we will collect information about you directly from you. In certain cases we collect your personal information from third parties. For example, we may need to collect personal information from a credit reporting agency, your representative (such as a legal adviser), your financial adviser, your employer or publicly available sources of information.

We only collect personal information for purposes which are directly related to the provision of Stronghold’s financial products and services. In the course of conducting these activities, we will be required to collect personal information including and without limitation your name, postal or email address, date of birth, financial details, tax file number, bank account details, identification documentation (e.g. drivers licence, trust deeds) or other information Stronghold considers necessary.

We do not collect sensitive information about you. Sensitive information includes information relating to:

- Race
- Political or religious beliefs
- Sexual preferences
- Criminal convictions
- Membership of professional or trade associations or unions
- Health information

Using and disclosing your personal information

We will only use and disclose information about you for the purpose for which it was disclosed to us. We will only use and disclose your information for related purposes which would reasonably be expected without your permission.

For example, we may from time to time use your personal information to inform you of investment opportunities or to provide information about products and services which we expect may be of interest to you. However, we do respect your right to ask us not to do this.

It may be necessary for us to share information to meet your specific needs, such as with your financial adviser, or with providers of services to us, such as internet, information technology and mail out services. In all circumstances, we ensure that such service providers are bound by strict confidentiality requirements to ensure the privacy of your information. Personal information is not disclosed to overseas recipients unless as part of a related third party.

Some examples of related third parties to whom personal information may be disclosed include:

- organisations involved in providing, managing or administering your product or service such as lenders, trustees, mortgage insurers and our advisers;
- your financial advisers and their service providers;
- your representatives including your legal advisers, executor, administrator, trustee, guardian or attorney;
- financial institutions and non-banking financial institutions at their request if you seek finance from them; and
- third parties as required or authorised by law, for example, to government or regulatory bodies for purposes related to public health or safety, the prevention or detection of unlawful activities or to protect public revenue.

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## Keeping information accurate and up to date

We aim to make sure that the personal information we collect, use or disclosure is accurate, up to date and complete. We will take reasonable steps to ensure this is the case to ensure we can provide you with a better service. If you feel the information we have about you is inaccurate, out of date or incomplete please contact us to ensure it is corrected.

## Security of your personal information

We will take reasonable steps to protect your personal information from misuse, loss and from unauthorised access, modification or disclosure. We will take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for any purpose.

## Contacting us and accessing your personal information

Under Australia's National Privacy Principles, you may access personal information about you held by us except in limited circumstances. You can contact us to request access to your information. In normal circumstances we will give you full access to your information. However, there may be some legal or administrative reasons to deny access. If access is denied, we will provide you with the reason why.

## Complaints and further information

If you have a comments about our privacy practices or if you think we have breached your privacy rights or if you simply want to know more about our privacy practices, you can contact us by writing to:

The Privacy Officer  
Stronghold Investment Management Limited  
PO Box 3355  
Darra, QLD 4076

For more information about privacy in general, you can visit the Federal Privacy Commissioner's website, [www.privacy.gov.au](http://www.privacy.gov.au).

This Stronghold Privacy Policy has been updated and is current as at 4 February 2016.

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