

PRIVACY POLICY

Protection of your personal information is important to us at Stronghold Investment Management Pty Limited and our Authorised Representatives (together referred to as "Stronghold" or "we", "us" or "our"). 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 and the National Privacy Principles.

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 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. If you are an individual and we (as a Financial Services Licensee) request your tax file number, you are not obliged to provide your tax file number but there may be financial consequences where you do not do so.

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, if you do not wish to receive direct marketing material, you may decline to receive such material by contacting our Privacy Officer on the contact details below.

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. We do not disclose your personal information to overseas recipients unless disclosure is required as part of the services provided by a third party service provider.

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.

Keeping information accurate and up to date

We aim to make sure that the personal information we collect, use or disclose 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 the Privacy Officer on the below contact details to have it updated.

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. We will promptly notify you if your personal information is accessed or released without proper authorization and the breach is likely to result in serious harm. Where we are unable to contact you, we will put a notification on <https://www.strongholdinvest.com.au/> in relation to the breach.

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 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

This Stronghold Privacy Policy has been updated and is current as at 11 June 2018.