



PROPERTY FINANCE • FUNDS MANAGEMENT

Privacy Policy

October 2015

Page 1 of 9

Policy review History

Date	Reviewer	Nature/Purpose of Review/Amendment Date	Committee &/or Board Approval

About this Privacy Policy

This policy document describes how we manage your personal information. Further it describes the nature of the personal information held, the purpose for which it is held and the manner in which it is collected and distributed. We encourage you to check our website regularly for updates to our Privacy Policy.

1. The Australian Privacy Principles effective from 12 March 2014

The privacy of your personal information is important to us at Shakespeare Haney Securities Limited ACN 087 435 783 (SHSL). We are committed to respecting your right to privacy and to protecting your personal information. We are bound by the Australian Privacy Principles "APP" in the Privacy Act 1988 and Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Commonwealth) and any other applicable laws and codes affecting your personal information.

The entity which is bound by the Privacy Policy is Shakespeare Haney Securities Limited.

2. Collecting personal information about you

The kinds of personal information we hold

We only collect personal information that is necessary for us to perform our functions and activities which consist of the origination, assessment and administration of loans and related activities as well as processing applications for investment in units in the registered schemes we manage. The kinds of personal information we collect and hold will depend upon your dealings with us and the circumstances in which it was collected, but may include:

- Information you provide to us when you apply for units in one of our registered schemes or a loan or when you offer to guarantee a loan. This information will include your name, date of birth, address (both postal and email,) contact details, and, if applicable, identification information relevant to applications requiring compliance with the Financial Transactions Reports Act.
- Financial information about you such as your financial position and details of your salary or wage, and information obtained from credit checks carried out during the loan approval process **(but only if you have authorised such checks to be carried out.)**
- Information about the progress of any loan provided to you, or which you have guaranteed, including your communications with us.

In certain cases we may collect your personal information from third parties. For example, we may need to collect personal information from a credit reporting body, your representative (such as a legal adviser), your financial adviser, any publicly available sources of information, or from any of the other organisations identified below under "Using and Disclosing Your Personal Information". The personal information is securely stored by us .

3. Using and disclosing your personal information

The purposes for which we collect and hold personal information and how we use and disclose it

We respect your privacy. Any personal information which we collect about you will be used by us to assess your application for investment into one of our registered schemes or a loan or offer to provide a guarantee on a loan, and to facilitate provision and administration of loans and related activities but not otherwise than the primary purpose of collection.

In order to do this, we may disclose your personal information to:

- professional advisers such as solicitors, accountants and valuers;
- government agencies such as those which administer land titles and revenue or (where applicable) foreign investments;
- credit reporting agencies and mercantile agents;
- external auditors; and
- other organisations which participate in funding, providing and administering your loan or the loan you have guaranteed, such as the trustee of the fund from which the loan is sourced.

We may also use your personal information to provide you with information about other products and services offered or distributed by us. To do that we may disclose your information to our service providers.

We also disclose personal information to organisations to which we outsource functions, such as mailing and printing houses, IT providers, mortgage servicers, unit registry and custodian service providers and other organisations which assist us to service and administer your investment loan or the loan you have invested in.(if applicable)

We will also use your personal information to keep you informed about other products and services or special offers. If you do not wish to be kept informed, please let us know when we contact you.

** We will take reasonable steps to:-

- (a) protect your personal information from misuse, interference, loss and unauthorised access modification or disclosure. After seven years of your ceasing to be a borrower, guarantor or investor we will take steps to destroy personal information we hold if it is no longer needed for the purpose for which it was collected.
- (b) ensure the personal information we collect is accurate, up to date and complete and is used in that vein considering its purpose.

** We will not provide personal information to direct marketers or an overseas organisation other than a government agency or otherwise as authorised by you.

4. Access to your personal information

In most cases, you can gain access to personal information that we hold about you or seek corrections to it by contacting our Privacy Officer as per the attached Privacy Statement. We will handle requests for access to your personal information in accordance with the APPs.

5. Protecting your personal information

Records of your personal information are kept in several forms including both paper and electronic form. The security of your personal information is important to us and we take all reasonable precautions to protect it from unauthorised access, modification or disclosure and from loss or misuse. These precautions include:

- confidentiality requirements for our employees
- document storage security policies
- security measures for systems access
- providing a discreet environment for confidential discussions
- only allowing access to personal information where the individual seeking access has satisfied our identification requirements
- access control for our buildings
- the security measures described in our attached Privacy Policy Statement

6. What to do if you would like more information about how we manage your personal information or wish to complain about a breach of your privacy

If you would like more information about the way we manage our personal information or are concerned that we may have breached your privacy and wish to make a complaint, please contact us by calling us on (07) 55386766, or e-mail admin@shsl.com.au or by writing to us at The Privacy Officer, Shakespeare Haney Securities Limited, PO Box 1242, Surfers Paradise, Qld, 4217.

7. Changes to our Privacy Policy

From time to time it may be necessary for us to review and revise our privacy policy. We reserve the right to change our privacy policy at any time. We may notify you of any change to our privacy policy by any means we choose including by email, by other electronic communication, by sending you a revised copy or by otherwise informing you that a revised copy of our privacy policy is available on request.

PRIVACY POLICY STATEMENT

We Respect Your Privacy

We treat your privacy seriously. This Privacy Policy describes how we treat personal information received about you from either our website or otherwise. This Privacy Policy applies to all our services whether offered on our website or otherwise.

This statement details our policy on collecting, disclosing, accessing and securing your personal information in accordance with the provisions of the Privacy Act 1988, as amended and the Australian Privacy Principles contained within the Privacy Act. Personal information means any details, information or opinion about you, from which your identity is apparent or your identity can be reasonably ascertained. If you have any questions relating to this document, please contact us.

By you accessing or using any part of our web site, you agree to be bound by this Privacy Policy. By using our website, you agree that if you provide your personal information to us, we may maintain a record about you and that you agree to us using "cookies" on your browser (refer below for information). Your agreement to this Privacy Policy;

- constitutes an acknowledgement of its terms and an authorization for us to deal with and disclose any personal information provided to us in the way specified below; and
- constitutes an authority for any representative to whom you have provided personal information to deal with and disclose any information you provide to that representative to us in the way specified below.

Please note that we may make content or services from other websites available to you from links located on our site. These other websites are not subject to this Privacy Policy. We recommend that you review the Privacy Policy at each such website to determine how the operator of that site will protect your privacy.

Collecting Personal Information About You

We will only collect personal information from you for authorised purposes. The kinds of personal information we collect and hold will depend upon your dealings with us and the circumstances in which it was collected, but may include information:

- You provide to us when you apply for a loan or when you offer to guarantee a loan. This information will include your name, address and contact details, and, if applicable, information to comply with the Financial Transactions Reports Act.
- About you such as your financial position and details of your salary or wage and information obtained from credit checks carried out during the loan approval process (but only if you have authorised such checks to be carried out).
- About the progress of any loan provided to you, or which you have guaranteed, including your communications with us.
- You apply for investment units in one of our registered schemes.

You do not have to provide us with personal information if you do not wish to do so. However, if you choose not to provide us with any requested information, we may not be able to assist you with our products or services.

We may, and you authorise us to obtain information about you from government databases and credit reporting agencies. We collect that information about you to provide services to you and to procure credit for you and no law compels us to collect any of that information. We might also choose to make such enquiries or request such documents as we consider necessary in order to assist any application for finance you make. You authorise us to make enquiries or request any documents, including, without limitation, contacting your employer for confirmation of your employment details.

If you do not provide us this information or authorise us to obtain this information, we will not be able to assist you in procuring the services and/or credit you require.

Where Is This Information Stored?

We store this information on our databases and in files maintained for the registered schemes held in our office.

Disclosing Your Personal Information

Any personal information which we collect about you will be used by us to:

- Process an application for units in one of our registered schemes.
- Assess any application for any loan or offer to provide a guarantee which you make now or in the future, and/or to facilitate provision and administration of loans and related financial services. In order to do this, we may disclose your personal information to professional advisers such as solicitors, accountants and valuers, mortgage insurers and underwriters that have or may have an interest in your loan or in our business; government agencies such as those which administer land titles and revenue or (where applicable) foreign investments; credit reporting agencies and mercantile agents; external auditors; and other organisations which participate in funding, providing and administering your loan or the loan you have guaranteed, such as the trustee of the Fund from which the loan is sourced.

We will also use your personal information to keep you informed about other products and services or special offers. If you do not wish to be kept informed, please let us know when we contact you.

We may also disclose personal information to organisations to which we outsource functions, such as mailing and printing houses or IT providers, mortgage servicer organisations and unit trust registry and custody service providers assisting us to service and administer your investment and or loan or the loan you have guaranteed.

You agree that we may also do any of the following at any time:

- Seek and use consumer credit information about you to assess an application for consumer credit or commercial credit.

-
- Seek from and use or give to another credit provider (including without limitation any other credit provider who has lent money on the same security) any information about your credit worthiness, credit standing, credit history or credit capacity. In particular, we may provide a bank opinion on you.
 - Seek from, use and give any consumer or commercial credit information to brokers, financial consultants, accountants, lawyers or other advisers acting in connection with any financing provided to or proposed to be provided to you.
 - Give a credit reporting agency personal or commercial information about you. The information may include identity particulars; the fact that credit has been applied for, and the amount; the fact that we are a current credit provider to you; details of payments which have been overdue for more than 60 days, and for which action has commenced; advice that payments are no longer overdue; advice that cheques drawn by you have been dishonoured more than once; in specified circumstances that in our opinion, you have committed a serious credit infringement; and the credit provided to you by us has been paid or otherwise discharged.
 - Disclose or report any personal information about you to another person in connection with funding financial accommodation by means of any arrangements involving securitisation.
 - Provide information to any person who proposes to guarantee or has guaranteed repayment of any credit provided to you.
 - You also acknowledge that our business associates, including financiers, mortgage insurers, introducers, brokers, insurance agents, solicitors, accountants, valuers or underwriters may disclose information about you for the purposes stated above.

Access, Correction, Deletion and Complaints

If you require access to details of personal information we hold about you, you may request your personal information by contacting our Privacy Officer. If you wish us to correct or delete personal information that you believe is inaccurate or out of date or you are concerned that we may have breached your privacy, please contact our Privacy Officer at the following address:

The Privacy Officer
Shakespeare Haney Securities Limited
PO Box 1242
Surfers Paradise QLD 4217

If for legal or commercial reasons we are required to keep your personal information and not make a correction or deletion, we will place with the disputed information a statement from you claiming that the disputed information in your opinion is not accurate, complete or up to date.

We may charge a fee for the provision of personal information to cover our costs. Any fee involved will be advised when a request is made.

If you are not satisfied with the result of your complaint to us, you can refer your complaint to the Federal Privacy Commissioner on telephone number 1300 363 992 or in writing to the Director of Complaints, Office of the Federal Privacy Commissioner, GPO Box 5218, Sydney NSW 1042.

Changes to Our Privacy Policy

We reserve the right to change our Privacy Policy at any time. The amended Privacy Policy will apply between us whether or not we have given you specific notice of any amendment.