

Privacy Policy

Our Commitment to Privacy

Kaplan Funds Management Pty Limited ("Kaplan") recognises that your privacy is important.

Kaplan is bound by the Privacy Act 1988 (Cth) and bound by, and committed to supporting the Australian Privacy Principles (APPs) set out in the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

This Privacy Policy outlines how your personal information is managed i.e. the type of personal information we collect, how that information is collected, used, stored and protected, and to whom we may disclose your personal information.

Personal Information Collection

We primarily collect personal information through our Master Trust and Pooled Superannuation Fund Application Forms and from information you provide when you phone or contact our staff.

We are committed to being open about how we use your personal information. Where we request your personal information we will generally state the purpose for its use and to whom it may be disclosed.

The type of personal information we collect from you includes: your name, contact details (such as your address and telephone number), date of birth, investment details, bank account information and tax file number. *The Corporations Act 2001* requires us to collect your name, address and date of birth. The Government's anti-money laundering law also requires us to collect additional personal information from you.

Generally, we do not collect 'sensitive information'. However, if the need does arise, it will usually be for the purposes of providing our services and we will seek your consent to collect such information subject to any exceptions allowed by law.

When browsing our website, web servers automatically collect standard information as part of the web protocol. Kaplan uses 'cookies' to collect statistical information such as time of visit, pages viewed, browser and some system information. These cookies do not personally identify you. If you do not wish information to be collected through the use of cookies, you can disable or block the use of cookies in your internet browser.

How we use Personal Information

We are subject to certain legislative and regulatory requirements that necessitate us obtaining and holding detailed information that personally identifies you and/or contains information about you. This information is used to administer your investment and communicate with you on a regular basis about your investment and the market.

Staff may also use personal information to verify your identity over the phone.

In some circumstances Kaplan and/or the Trustee may disclose your personal information to persons/entities outside of Kaplan. This is for the purpose of administering your account through third party service providers who may perform certain services domestically and overseas. As a result, personal information collected by Kaplan may be disclosed to recipients in a foreign country. Kaplan takes reasonable steps to ensure our third party providers contractual arrangements comply with the APPs to ensure your personal information is safeguarded

For example:

- Kaplan uses external providers to help us provide our services to you (such as registry, administrative services, printing, mailing and external consultants).
- We may be required to provide your details to a government or regulatory body (such as ASIC, ATO or AUSTRAC).

We take steps to ensure external providers keep your personal information confidential and use it only for the purposes for which they, and Kaplan, are authorised.

You may authorise us to disclose information we hold about you to your financial adviser or personal representative. Your consent is required.

Personal Information Security

We take reasonable steps to protect the information we retain from misuse, loss and from unauthorised access, modification or disclosure.

By providing us with your personal information via email or other electronic communication you accept that such information is transmitted at your own risk as the security of such cannot be guaranteed.

We will not retain any of your information for any longer than it is required by us, except to satisfy legal requirements. We will destroy or de-identify your personal information when it is no longer required.

Access to Personal Information and Correction

You may access the personal information we retain and request corrections of any inaccuracies. This right of access is subject to some exceptions allowed by law.

We will endeavour to ensure that at all times the personal information about you that we hold is up to date, complete and accurate. The accuracy of the personal information is dependant to a large degree on the information you provide and you should advise us if there are any errors in your personal information.

Need to Contact us

If you have any questions about this Privacy Policy or wish to make a complaint about how your personal information has been handled, please contact the Privacy Officer, who is the Compliance Officer of the Company:

Telephone: (02) 8917 0300 (Monday to Friday between 9.00am and 5.00pm Sydney time, excluding national public holidays).

Correspondence Address:

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Sydney NSW 2000
Fax: (02) 8917 0355

Email: enquiries@kaplanfunds.com.au