

# **Privacy Policy**

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Stable Connect

Date: 3 July 2019

## 1 Overview

This document outlines Stable Connect's policy on handling the personal information we collect about individuals including clients and potential clients.

This Privacy Policy does not apply to personal information collected by Stable Connect that is exempted under the Privacy Act, for example employee records.

"Stable", "we", "us" or "our" refers to the Stable Connect. We provide managed investment scheme management, promotion of syndicated investment, general advice and other products and services. This privacy policy (Privacy Policy) sets out how we are committed to protecting your privacy and how we collect, store, use, protect and share your personal information in accordance with Australian Privacy laws.

A copy of this Privacy Policy is available on our website [www.stableconnect.com.au](http://www.stableconnect.com.au), or you can request a copy by contacting our Privacy Officer at the end of this policy.

## 2 Why we collect personal information

Our principal purpose in collecting, using and storing your personal information is so that we can effectively meet our client's needs in the provision of financial and legal services and products. In this policy, personal information is any information that could identify you or be used to establish your identity.

Stable Connect collects, holds and uses personal information for a number of purposes including:

- (a) provide the services requested by you;
- (b) to verify your identity;
- (c) research, develop and improve our services;
- (d) to conduct surveys to determine use and satisfaction with our services;
- (e) to perform internal statistical analysis in relation to our database and website;
- (f) to meet any regulatory obligations;
- (g) obtain goods and services;
- (h) verify information for accuracy or completeness (including by way of verification with third parties);
- (i) combine or aggregate your personal information with information we collect from third parties and use it for the purposes set out this Privacy Policy;
- (j) contact you at your contact details we have collected, by way of voice call, post, text message or email to keep your contact details up to date;
- (k) aggregate and/or make anonymous your personal information, so that it cannot be used, whether in combination with other information or otherwise, to identify you;
- (l) collect fees, resolve disputes and to identify, test and resolve problems;
- (m) supply you with generalised, targeted or personalised marketing, advertising and promotional notices, offers and communications based on your preferences, and measure and improve our marketing, advertising and promotions based on your preferences; or
- (n) recruit employees, staff and contractors.

## 3 Personal information we collect

The type of personal information we collect depends on the type of dealings we have with you. You may be a client or an employee of a client of our business, have made enquiry with us or provided us with feedback from an enquiry we have made of you, applied for a job with us or supply goods and

services to us. If it is relevant to the services we provide to you we may collect the following personal information:

- (a) your name, date and place of birth, user ID's and passwords, phone number, mobile telephone number, email address, physical address and other contact information;
- (b) financial information such as credit card or bank account numbers;
- (c) records and content of communications with us or any other person including when using Website communication tools;
- (d) personal information based on your activities on the Website;
- (e) personal information you provide to us through correspondence, applications, agreements, or shared by you from other social applications, services or websites;
- (f) to the extent permitted by law, other personal information provided by or obtained from third parties (such as a credit bureau) including navigation and demographic data and credit check information, public registers including Australian Securities & Investments Commission (ASIC), Racing Information Services Australia (RISA) and the Australian Stud Book (ASB); and
- (g) personal information from your interaction with the Website and its content and advertising, including device identifiers, device type, geo-location information, connection information, statistics on page views, traffic to and from the Website, mobile network information, time, date, referring URL, the type of operating system and browser, ad data, IP address and standard web log data.

When you visit our website, some of the information that is collected about your visit is not personal information, as it does not reveal your identity.

We may ask for a range of personal information to assist us in providing you with the services you require. Information we request could include (but is not limited to) name, address, date of birth, contact details, income, assets and liabilities, tax and financial statements, employment details, domicile and citizen status.

## **4 Collection**

We collect personal information in a number of ways, including:

- (a) when you provide information directly to us in person, by phone or in writing (whether electronic, via our communication tools or otherwise);
- (b) when you visit and/or use the Website, in which case, we record information sent to us by your computer, mobile device or other access device; and
- (c) from third parties such as our related entities, service providers to us, operators of linked websites, and enquiries on the Website.

### **4.2 Direct marketing**

We may use your personal information to send you information about our services as well as invitations to functions and relevant events where we have your express or implied consent, or where we are otherwise permitted by law so to do.

### **4.3 Opting out**

You may withdraw your consent to us collecting, storing, using and disclosing your personal information in accordance with this Privacy Policy and/or you may opt out of receiving our marketing, advertising and promotional notices, offers and communications by:

- communicating this to us in writing to our Privacy Officer as set out in clause 12; or
- using the unsubscribe facility that we may include in our commercial electronic message (such as emails and SMSs) to opt out of receiving those messages.

#### **4.4 Disclosure to third parties**

Notwithstanding section 4.3 above, you agree that we may disclose your personal information to:

- (a) enforce our Terms of Service, this Privacy Policy and other policies;
- (b) comply with any applicable law, request by a governmental agency or regulatory authority or legally binding court order;
- (c) protect a person's rights, property or safety;
- (d) our directors, staff, contractors, professional advisers and related entities;
- (e) outsourced service providers who assist us to provide its services such as information technology providers and marketing advisers (including in relation to fee collection, fraud investigations and Website operations);
- (f) third parties to whom you expressly ask us to send, or consent to us sending, your personal information;
- (g) credit agencies (including regarding missed and late payments or other defaults or breaches on your account); or
- (h) such entities that we propose to merge with or be acquired by and in such case, we will require that the new entity following the merger or acquisition adhere to this Privacy Policy.

### **5 Cross border disclosure of personal information**

We may disclose your personal information to third party suppliers and service providers located overseas for the purposes listed above.

This does not diminish your rights and we will take all reasonable steps necessary to ensure transferred information is kept secret as required by applicable data laws. By submitting your personal information to us you agree that you do not object to such transfer, processing or storage.

### **6 Use of Cookies**

- (a) We (or a third party providing services to us) may use cookies, pixel tags, "flash cookies", or other local storage provided by your browser or associated applications (each a Cookie and together Cookies). A Cookie is a small file that stays on your computer or device until, depending on whether it is a sessional or persistent cookie, you turn your computer or device off or it expires (typically between 7 and 30 days depending on user settings).
- (b) Cookies may be used to provide you with our range of services including to identify you as a user or member of the Website, remember your preferences, customise and measure the effectiveness of the Website and our promotions, advertising and marketing, analyse your usage of the Website, and for security purposes.
- (c) Cookies may collect and store your personal information. This Privacy Policy applies to personal information collected via cookies. You may adjust your internet browser to disable cookies. If Cookies are disabled, We may not be able to provide you with the full range of our services.
- (d) You also may encounter Cookies used by third parties and placed on certain pages of the Website that we do not control and have not authorised (such as webpages created by another user). We are not responsible nor liable for the use of such Cookies.

### **7 Security**

- (a) We hold personal information in a number of ways, including in hard copy documents, electronic databases, email contact lists, and in paper files held in drawers and cabinets.
- (b) We take all reasonable steps to ensure that the personal information that we collect, use and disclose is accurate, up to date and complete and relevant and we destroy or de-

identify personal information that is no longer needed for any purpose that is permitted under Australian laws.

- (c) We take all reasonable steps to ensure your personal information is secure from misuse, loss and from unauthorised access, modification or disclosure by implementing a variety of measures which includes website protection software, security restrictions on access to our computer systems, personnel security staff training and workplace policies.
- (d) Where we process payments using online technologies all transactions will be processed by us meeting industry security standards to ensure payment details are protected.
- (e) As our website is linked to the internet, and the internet is inherently insecure, and whilst We strive to protect the personal information and privacy of users of our website, We cannot guarantee the security of any information that you may disclose to Us and you disclose such information at your own risk. You may disclose your personal information to Us over the telephone or by post if you are concerned.
- (f) Our website may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practises of any third party website and We are not responsible for the privacy policies or content of any third party website. Third party websites should have in place their own privacy and security policies which you should make enquiry of and read before supplying them with any personal information.

## **8 Accessing and amending your personal information**

- (a) You may request access to any personal information that we hold by contacting our Privacy Officer (see below). Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example by providing you photocopies or emailing it to you) provided it is reasonable and practicable for us to do so. We may charge a fee to cover our reasonable costs to do but we will not charge you for simply making a request or making any corrections to your personal information.
- (b) If you believe that any personal information we hold about you is incorrect, incomplete or inaccurate, then you may request we correct it. Should our website or other internet services provide you with a secured access it is important that you protect your password by using unique letters, numbers and special characters and by not sharing your password with any third party. If you disclose or lose control of your password or your personal information to a third party, you may be responsible for all actions taken in the name of your account or with this information including legally binding actions taken on your behalf. If you suspect that your password or account has been compromised, you must immediately notify us and change your password.

## **9 Complaints**

- (a) If you have a complaint to Stable Connect about our handling of your personal information , please contact us using the contact information below and provide details of the incident or the situation that has arisen for you to have formed your belief of a possible breach so that we can investigate it. We will treat your complaint confidentially whilst we investigate it with the aim to have it resolved in a timely manner and where the Act requires within the time period stated.
- (b) Our investigation may require gathering relevant facts, locating and review relevant documents and speaking to relevant individuals.
- (c) If you are not satisfied with the outcome of your complaint, you can refer your complaint to the Office of the Australian Information Commissioner – call 1300 363 992 or find them online at [oaic.gov.au](http://oaic.gov.au).

## **10 Agreement to terms of Privacy Policy**

By using this Website and/or providing information to us, you accept and agree to the collection, use, holding and disclosure of your personal information for the purposes described in this policy.

## **11 Information Sharing with Social Media**

We may offer services that allow you to share public aspects of the Website with third party websites such as Google Plus, Twitter, LinkedIn, Facebook and other social media websites.

## **12 About this Policy**

This Policy is effective as of 3 July 2019. We will update this policy when our information handling practices change and any amendments will apply to the information we hold at the time of the update. We will put the updated policy on our website; we encourage you to check our website from time to time to view our current policy or contact us for a printed copy.

*This policy applies to Stable Connect Limited (ABN 13 135 494 647).*

We comply with the Australian Privacy Principles (**APPs**) in the Privacy Act 1988 and the Privacy Amendment (Enhancing Privacy Principles) Act 2012 which regulate the manner in which your personal information is handled from collection to use and disclosure, storage, accessibility and disposal.

Contact Us

If you have a question regarding this Privacy Policy or you would like to make a complaint, please contact the Privacy Officer at:

Email: [privacy@stablefinancial.com.au](mailto:privacy@stablefinancial.com.au)

Address: Level 6, 45 William Street, Melbourne Vic 3000

Contact: Ashleigh Carpenter