



STARA INVESTMENT MANAGEMENT LIMITED

ACN 653 962 871

Privacy Policy

CONTENTS

1.	Purpose	1
2.	Collecting Personal Information	1
2.1	Information Collected	1
2.2	Why personal information is collected	1
2.3	How is personal information collected?	2
3.	How do we use and disclose that information	2
3.1	Use and disclosure	2
3.2	Direct marketing and disclosure to third parties	3
4.	Keeping information secure	3
5.	How you can access, correct and update your information	4
6.	Changes and updates to this policy	4
7.	Contact details	4
8.	Complaints	4

1. Purpose

Stara is committed to its clients and both respects and takes steps to protect the privacy of the personal information of individuals with whom it deals. The way we manage your personal information is governed by the Privacy Act 1988 (Cth) (Act) and the Australian Privacy Principles (APPs) established under the Act (as amended from time to time). Our Australian Privacy Policy tells you how we manage personal information we may collect about you if you are in Australia, how we may use and disclose it (including overseas), steps we take to keep it secure, how we store it, how to access and correct your personal information and how you can complain and how we will deal with your complaint.

2. Collecting Personal Information

2.1 *Information Collected*

The information we collect will depend on who you are and the nature of your dealings with us. The types of personal information we may collect include:

- your contact and identification details such as: your name, address, date of birth, telephone number, email address, and other identity information from any documents you offer as proof of your identity (for example, driver's licence details or passport);
- transactional information you provide when dealing with us (for example, bank account details and Tax File Number);
- personal information you provide when you commence a client relationship with us, including in application forms for our products (the types of information that may be collected are set out in the first point above);
- personal information you provide when you apply for employment at Stara or when you are employed by us, including information collected through the onboarding process and employee surveys. Sensitive information collected may include gender, nationality, ethnic origin, languages spoken, dietary needs and health information (such as immunisation status)
- any correspondence between you and us; and
- any other personal information you provide when you make an inquiry, request information or otherwise correspond with us

2.2 *Why personal information is collected*

Stara collects your personal information to enable us to provide our products and services, process job applications, support employment, administer our business and comply with our legal obligations. In particular, Stara may collect personal information in order to:

- determine your requirements and so provide you with appropriate information about our products and services;
- process any communication you send us (which includes answering any queries and dealing with any complaints or feedback you have);

- conduct internal research to improve the way we interact and communicate with you;
- comply with our legal obligations including the obligation we have to identify our customers before dealing with them (for example, under the Anti-Money Laundering and Counter Terrorism Financing Act 2006 (Cth));
- get in contact with you should we need to;
- do anything which you authorise or consent to us doing; or
- take any action we are required or authorised by law to take. If you do not provide us with your personal information, it may not be possible for us to provide you with the products or services you have requested or to take any of the above steps. Where it is lawful and practical to do so, we may allow you to deal with us anonymously.

2.3 *How is personal information collected?*

If possible, we always try to collect personal information directly from you when you deal with us (for example, when you make an enquiry, correspond with us, or apply for, use or access any of our products or services). We may also obtain your personal information from third parties we deal with (for example, your financial advisers, our contracted service providers or any other organisation acting on behalf of Stara). We may also collect personal information from third parties you refer to us. If we do so, we will assume that you have made that third party aware of the referral and the purpose(s) of the collection, use and disclosure of the relevant personal information.

3. How do we use and disclose that information

3.1 *Use and disclosure*

We use your personal information to assist us in conducting our business and providing you with investment products and services. This includes to:

- keep in contact with you (where you have requested us to do so) and provide you with any information you have requested;
- process any communications you send us (including answering any queries and dealing with any complaints or feedback you have);
- inform you of investment opportunities or to provide information about investment products and services which we think might be of interest to you;
- properly identify you;
- maintain any business relationship we have with you including as an investor;
- help us develop, manage and improve services to our customers;
- do anything you authorise or consent us to do; and
- take any action or communicate with you where we are required or authorised by law to do so.
- If you apply for a role with us or are employed by us, your personal information will be confidentially stored and we may use your information to report various employment demographics to regulators, industry bodies and to shareholders.

We may disclose your personal information to:

- our business associates, referral partners, agents and other entities for purposes which are related to our purposes for collecting your personal information;
- other organisations with whom we have alliances or arrangements for the purposes of promoting our respective products or services;
- our professional advisers, contractors, or other service providers we engage to carry out, or advise on, our functions and activities;
- your nominated financial adviser;
- any other entity to which we are required or authorised by law to disclose such information (for example, law enforcement agencies and government agencies); and
- with your consent, express or implied, to others.

Overseas disclosures and transfers

Overseas disclosures and transfers We may send your personal information to our related bodies corporate and third-party service providers to whom we outsource certain functions, such as email functions, who may be located overseas, including in New Zealand, India, the United States of America, Ireland and the United Kingdom. Our technology service providers may also store your personal information overseas, but only to the extent required to securely back-up data. When we disclose your information overseas, we are required to take measures to ensure your information is treated in accordance with the standards that apply in Australia except in rare cases (for example, where we are required by law to disclose your information overseas) or where we obtain your consent not to take these measures.

3.2 Direct marketing and disclosure to third parties

We or the above third parties may also use your personal information to provide you with information about our products and services. You may request not to receive marketing material from us at any time by contacting us (details below). If you tell us you no longer wish to receive marketing or promotional material from us, we will not send you any such material. If you change your mind in the future and wish to receive marketing or promotional material from us, please contact us.

Stopping marketing and promotional material from third parties

As a general rule, if third parties have received your personal information, their handling of your personal information will be governed by their privacy notices and policies. In some cases, it may also be necessary for you to contact the relevant organisations to whom we have provided your personal information to notify them of your decision.

4. Keeping information secure

We will take reasonable steps to protect your personal information as we maintain a robust security posture. We will also take reasonable steps to securely destroy or de-identify personal information when it is no longer required (including where we receive unsolicited personal information). However, we may be required by law to retain certain information for a set period. After that time, we will destroy or delete this information in a secure manner.

5. How you can access, correct and update your information

To effectively provide you with products and services, it is important that the personal information we hold about you is complete, accurate, current and not misleading. If you become aware that the personal information we hold needs to be corrected or updated, please contact us at the contact details below.

6. Changes and updates to this policy

This Privacy Policy is reviewed and updated at least annually by management. Stara may amend this Privacy Policy from time to time including to reflect changes to its legal obligations, practices or technology. If we amend this Privacy Policy, we will make the updated Privacy Policy available on our website and this version will apply from the time of posting. Stara encourages you to periodically review this Privacy Policy to be informed of how Stara is handling your personal information.

7. Contact details

If you have any questions or concerns regarding our Privacy Policy or handling of your personal information, please contact us.

Phone: +61 7 3155 700

Email: enquire@stara.net.au

8. Complaints

If you have a complaint about a product or service offered by Stara, please contact us on +61 7 3155 7000. If you are not satisfied with the response you receive, you may write to us as follows:

Post: Level 7, The Annex, 12 Creek Street, Brisbane

Email: enquire@stara.net.au