

Privacy Disclaimer

The 'Important information' disclaimer for the website should also include the following Privacy Policy, or it can have a <u>separate link</u> on the Home page entitled "Privacy Policy", for instance at the very bottom in the footer.

Privacy Policy

Star Beta Technologies Pty Ltd (ABN 18 669 126 747) ('Star Beta, 'we' or 'us'), is committed to protecting your personal information in accordance with the Australian Privacy Principles provided for under the *Privacy Act 1988* (Cth) ('Privacy Act'). These principles govern how we can collect, use, hold and disclose your personal information.

What kinds of personal information do we collect and hold?

When you apply any of our financial products or services, we may collect information that is necessary to be able to provide you with the product or service. For instance, we may ask for identification information such as your name, address, and date of birth. Any unsolicited personal information we may collect will be promptly destroyed.

We may also collect other information as may be required from time to time either to provide financial products and services to you or ensure compliance with the law.

Why do we collect, hold, use and disclose personal information?

The main reason we collect, use, hold and disclose personal information is so we can service your request concerning the prospective financial product or service. This may include:

- Checking your eligibility for receiving the financial product or service;
- Providing you with the appropriate disclosure materials; and
- Helping you manage your engagement with the financial product or service.

How do we collect personal information?

We collect most personal information directly from you. Sometimes we collect personal information about you from other people such as publicly available sources of information.

Some of our products and services are offered by intermediaries such as financial planners, solicitors and/or accountants and we may collect personal information about you from these third parties, if and where applicable.

How do we hold personal information?

Much of the personal information we hold will be stored electronically and securely by us at the offices of our administrator. We use a range of security measures to protect the personal information we hold.

Who do we disclose your personal information to, and why?

Sometimes we may disclose your personal information to organisations outside Star Beta. For example, with the administrator of the Fund, so that it may perform its duties for the Fund and our services.

What is an eligible data breach?

In accordance with the Notifiable Data Breaches ('NDB') scheme of the Privacy Act, we (along with our service providers) will notify you of any unauthorised access, disclosure or loss of personal information.

In these circumstances, we perform an assessment to determine if there has been an 'eligible data breach'. To do so, we consider if the access or disclosure of personal information is likely to result in serious harm to the individuals affected by the suspected data breach.

If we determine there has been an 'eligible data breach', you will be notified as soon as practicable. We will notify you with the details of the breach and the recommended steps to take to mitigate any concerns. As required, we will report an 'eligible data breach' to the Office of the Australian Information Commissioner ('OAIC').

In summary, subject to certain exemptions, the NDB scheme requires us to:

- carry out a reasonable and expeditious assessment if there are reasonable grounds to suspect that there may have been an eligible data breach (and to take reasonable steps to complete that assessment within 30 days); and
- make the prescribed notifications (to OAIC, and if practicable, to affected individuals) as soon as we are aware that there are reasonable grounds to believe that there has been an eligible data breach. The notifications must include a description of the data breach, the kinds of information concerned and recommendations about the steps individuals should take in response to the data breach.

Who do we notify when there is a data breach of your personal information?

We are obliged to notify individuals whose personal information is involved in a data breach that is likely to result in serious harm (i.e. eligible data breaches). This notification must include recommendations about the steps individuals should take in response to the breach. The OAIC must also be notified of eligible data breaches.

Do we disclose personal information overseas?

We may disclose your personal information to recipients located outside Australia. These entities may include our service providers, which perform technology, operational and customer service functions on our behalf and may have hosting and cloud service providers in locations outside of Australia.

We will only do so in compliance with all applicable Australian data protection and privacy laws. We will not disclose your personal information to an overseas recipient unless we have taken reasonable steps to ensure that the recipient protects your privacy according to the Australian Privacy Principles. Nor will we sell your personal information or otherwise disclose it to a third party for a purpose which unrelated to a product or service we are providing to you.

We have a strict duty to maintain the privacy of all personal information we hold about you, however certain exceptions may apply. For example, disclosure of your personal information may be authorised or required:

- By law (e.g. disclosure to courts under subpoena or to various government departments and agencies such as the Australian Taxation Officer).
- In the public interest (e.g. where a crime, fraud or misdemeanour may be committed or suspected or with your consent, your consent may be implied or express and it may also be verbal or written).

Do we use or disclose personal information for marketing?

We may use your personal information to offer you other products and services that we believe may interest you. We will not do this if you tell us not to.

If you don't want to receive marketing offers from us, please contact us on the details listed at 'Contact us'.

Access to and correction of personal information

You can request access to the personal information we hold about you. You can also ask for corrections to be made on information that you may believe is inaccurate, incomplete or out of date.

To request access or to make any corrections, please contact us on the details listed at 'Contact us'.

Resolving your privacy concerns and complaints - your rights

If you are concerned about how your personal information is being handled or if you would like to make a complaint, please contact us on the details listed at 'Contact us'. We will endeavour to respond to any privacy complaints within 30 days.

If you are not satisfied with our response to your privacy complaint, you may seek a review by contacting the OAIC:

Website:	www.oaic.gov.au/contact-us
Phone:	1800 363 992
Email:	enquiries@oaic.gov.au
Mail:	Office of the Australian Information Commissioner
	GPO Box 5288
	Sydney NSW 2001

Contact us

If there is anything you would like to discuss, please contact us. If you have any questions or concerns about our privacy policy or practices, please contact us using one of the following methods:

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Email: info@starbetatech.com

Phone: +61 2 9072 1695