Our Privacy Policy relates to how we address each of the Australian Privacy Principles (APPs) set out in the Privacy Act 1988

APP1 – open and transparent management of personal information

Our policy: We are committed to manage any personal information we collect from our clients in an open and transparent way.

We collect personal information from you and about you as part of our advisory role. We do this in a variety of ways, including asking you for data about you and asking others to provide data about you (e.g. a super fund you invest in).

Any personal information we hold about you will be securely stored either in hard copy or on computer hard drive.

If you have any call to complaint about our treatment of your personal information you can contact us or the Privacy regulator directly – they are accessible here: www.oaic.gov.au.

Because we store some of our business data electronically and may back some or all of this data up using so-called "cloud-based" technology there is a chance that some of your personal information may be disclosed to overseas recipients in the sense that its transmission via the cloud will mean it is "disclosed" to the party that operates the IT infrastructure where the data is backed up.

We are unable to say with complete certainty which countries this infrastructure may be located in however if this is of concern to you we are happy to investigate and to advise.

We are also happy to provide you with a copy of this Privacy Policy free of charge upon request.

APP1.7 & 1.8 – Automated Decision-Making and Artificial Intelligence

How We Use Automated Systems and Artificial Intelligence

We may use automated systems, software tools and artificial intelligence technologies to assist us in providing financial services, managing regulatory obligations and improving our client services.

These technologies may be developed by us or provided by third-party technology providers and may include:

- client onboarding and identity verification systems;
- AML/CTF screening and fraud detection tools;
- client risk profiling and risk tolerance assessment tools;
- product and portfolio research systems;
- portfolio construction, asset allocation and rebalancing tools;
- financial modelling and strategy projection software;
- client relationship management and workflow systems;
- document review and drafting tools;
- generative artificial intelligence tools used to assist our staff in analysing information and preparing communications; and
- compliance monitoring and quality assurance systems.

Personal Information Used

These systems may use personal information including:

- identity and contact details;
- demographic information;
- financial information;
- investment objectives;
- risk profile information;
- superannuation and insurance information;
- information relating to your assets, liabilities, income and expenses;
- information collected during client interactions; and
- any other information you provide to us in connection with our services.

Decisions and Recommendations Supported by Automated Systems

Automated systems may be used to assist in:

- assessing client onboarding requirements;
- conducting identity verification and regulatory screening;
- identifying potential fraud, financial crime or cybersecurity risks;
- preparing financial projections and modelling outcomes;
- generating investment or insurance research;
- constructing or reviewing proposed portfolios;
- producing draft advice materials and client communications;
- identifying compliance issues or file review exceptions; and
- determining whether additional information may be required from you.

Human Oversight

Except where required by law or regulatory processes, we do not rely solely on automated systems to make personal financial advice decisions for clients.

Our advisers, authorised representatives and staff review and assess information generated by automated systems before making recommendations or taking action. Automated tools assist our personnel but do not replace professional judgment.

Use of Generative AI

We may use generative artificial intelligence technologies to assist with research, document preparation, drafting, summarisation and administrative functions.

Where generative AI is used:

- information may be processed by approved technology providers;
- we implement controls designed to protect confidential and personal information;
- outputs generated by AI are reviewed by appropriately authorised personnel before being relied upon; and
- AI-generated outputs are not treated as final advice without human review.

Your Rights

You may contact us to:

- request further information about our use of automated systems;
- seek access to personal information used by such systems;
- request correction of personal information; and
- raise concerns regarding decisions or recommendations that have been informed by automated processing.

APP 2 – anonymity and pseudonymity

Our policy: Although the Privacy Act makes provision for people to remain anonymous or use pseudonyms we believe it is impractical for us to deliver our services to you if you wish to do this.

APP3 – collection of solicited personal information

Our policy: We only collect information from you that we believe we need in order to deliver our services to you. Of course if we seek to collect "sensitive" personal information (as defined) from you we also seek your express consent first.

APP 4 – dealing with unsolicited personal information

Our policy: If we determine that we have obtained unsolicited personal information from you (i.e. information we don't actually need in order to deliver our services to you) we will contact you and return it or otherwise remove it from our records as soon as is practicable.

APP 5 – notification of the collection of personal information

Our policy: Where we collect information about you other than directly from you we will advise you of this fact and provide any other information to you about that collection as is determined relevant in the circumstances and in light of sub-clauses 5.1 and 5.2 of the APPs.

APP 6 – use or disclosure of personal information

Our policy: If we use or disclose your personal information for any purpose other than the primary purpose of its collection (or any secondary purpose you have expressly consented to) we will advise you as soon as practicable.

APP 7 – direct marketing

Our policy: If we wish to use any information we have gathered from you for the purpose of direct marketing we will seek your express consent first unless the circumstances of collection made it reasonably likely that we collected the information for that purpose – even if this is not the primary purpose of collection. Of course if we ever do this you will always have the option to "opt out" and not receive any direct marketing from us.

APP 8 – cross-border disclosure of personal information

Our policy: The only overseas recipient of your personal information we can currently imagine is the party that hosts any IT infrastructure that we back our business data to – e.g. via the so-called "cloud". We will seek confirmation from any such service provider that they will treat your data securely and in alignment with the APPs. If we form the view that they are not able to treat client personal information in this way we will seek an alternative service provider.

If we determine that some other overseas party may also receive your personal information we will perform the same assessment as above before we engage with them.

APP 9 – adoption, use or disclosure of government related identifiers

Our policy: We won't use any Government related identifier as our own identifier of you unless it is necessary for us to deliver our services to you and in doing so we need to liaise or communicate with a Government Department or agency that requires us to use a Government related identifier.

APP 10 – quality of personal information

Our policy: We will do all we can to ensure the personal information we collect is accurate, up-to-date and complete.

APP 11 – security of personal information

Our policy: We will take all reasonable steps to maintain and store your personal information securely so long as we reasonably require it to deliver our services. Once we no longer require this information we will take all reasonable steps to ensure it is securely destroyed or returned to you or your nominated agent.

APP 12 – access to personal information

Our policy: We will provide you with access to the personal information we hold about you provided no statutory exception applies. If we believe one does we will always advise you of our basis for refusing access so that you may consider your position viz-a-viz that refusal.

APP 13 – correction of personal information

Our policy: We are happy to rectify any personal information we hold about you should you (or we) consider our records to be inaccurate.

Contacting

If you have any questions about this Privacy Policy, please contact:

Phil Mason-Cox
Senior Financial Planner
523830
29 Southern Skies Avenue
Reedy Creek Qld 4227
phil@keysfp.com