



## PRIVACY POLICY

(As at 15 May 2018)

### **Adam Kiley / TSI Capital Pty Ltd (First Mover)**

ACN: 168 975 139

ASIC AR Number: 458224

#### Our Commitment to Privacy:

Adam Kiley T/A TSI Capital Pty Ltd (First Mover) recognizes that it is important for you to know how we deal with your personal information and for that reason this statement outlines our current Privacy Policy. TSI Capital Pty Ltd (First Mover) abides by the Australian Privacy Principles (APPs) established under the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth).

#### **Collection of Information**

TSI Capital Pty Ltd (First Mover) is required under various legislation and codes of practice to collect certain information about you in order to provide our range of services. These include, but are not limited to, the Corporations Act, Income Tax Assessment Act as well as certain regulations issued by the Australian Securities and Investments Commission (ASIC). In addition, our ability to provide you with comprehensive and quality services is reliant on us obtaining certain personal information about you. The staff and representatives of TSI Capital Pty Ltd (First Mover) may request personal and sensitive information from you, which will generally comprise, but not be limited to, the following type of information:

- Personal details e.g. name, address, contact details (phone, email), date of birth, marital status, dependents, employment details.
- Financial details e.g. assets, liabilities, income, expenses.
- Business details including ABNs.
- Details of all investments, superannuation, investor numbers, credit card and bank account details.
- Personal goals and objectives.
- Taxation information including your tax file number.

If you do not provide us with the information required, we may elect to terminate our relationship with you, if we believe it will jeopardise our ability to provide you with a complete, accurate and comprehensive service. We will not collect any personal information about you except when you have knowingly provided that information to us or authorised a third party to provide that information to us. Information will be collected from a variety of sources including directly from you, external organisations and associated companies of TSI Capital Pty Ltd (First Mover). We only collect, maintain and use personal and sensitive information about you if it is necessary for us to adequately provide the services requested.

#### **Use and Disclosure of Information**

Any personal information about you collected by TSI Capital Pty Ltd (First Mover) will be used for the following purposes:

- Provision of investment services.
- Completion of associated documentation and application forms.
- To market services which may be supplied by TSI Capital Pty Ltd (First Mover) or by other suppliers that may be of interest to you, unless you inform us not to do so.
- To provide you with agreed services to assist in meeting your requirements, needs, goals and objectives. The organisations we may be required to disclose information include, but are not limited to:
- Its parent company and other companies within the group.

- Financial institutions (including fund managers, financial advisers, stock brokers).
- Government departments e.g. Australian Taxation Office (ATO), ASIC and Centrelink as required by law.
- External service providers and other compliance inspectors for audit purposes
- External parties for business acquisitions or in the event of the sale of the business.
- Any other external party as authorised by you from time to time.

Furthermore, we will not use or disclose information collected about you other than for a purpose made known to you unless the disclosure is:

- Required by law (e.g. ATO, Australian Prudential Regulation Authority and ASIC have the power to order us to disclose information about your situation).
- Authorised by law (e.g. to protect our interests or where we have a duty to the public to disclose); or
- You have consented to our disclosing the information to you.

TSI CAPITAL PTY LTD (FIRST MOVER) undertakes not to sell, rent or trade your personal information. We may use the personal information collected from you for the purpose of providing you with direct marketing material such as articles that may be of interest to you, however you may request not to receive such information by contacting the Director as set out below.

### **Storage and Security**

TSI Capital Pty Ltd (First Mover) recognises how important the privacy of your personal information is to you. We will therefore, at all times, seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure. Your personal information is generally held in your personal file. Information may also be held in a computer database. All paper files are stored in secure areas. Computer-based information is protected through the use of access passwords. In the event you cease to be a client of this organisation, any personal information which we hold about you will be maintained in a secure on/ off-site storage facility for a period of at least 7 years in order to comply with legislative and professional requirements, following which time the information will be destroyed.

### **Identifiers**

TSI Capital Pty Ltd (First Mover) will not adopt as our own any identifiers that you may provide to us such as Tax File Numbers, Centrelink reference numbers, Medicare numbers etc.

### **Transfer of Information Overseas**

This is required either when information is sent directly to the client, or to obtain further information from international organisations to aid services provided. Wherever possible, the information will only be transferred to another country where TSI Capital Pty Ltd (First Mover) reasonably believes the other country has privacy laws substantially similar to our own.

### **Access Your Information**

You may at any time, request access to your personal information and we will provide you with access to that information either by providing you with copies of the information requested, allowing you to inspect the information requested or providing you with an accurate summary of the information held. We may, prior to providing access in accordance with this policy, require you to provide evidence of your identity. In the event we refuse you access to your personal information, we will provide you with an explanation for that refusal. We will endeavour to respond to any request for access within 14 days depending on the complexity of the information and/ or the request and may charge fees for the request of a significant amount of information to be copied or accessed.

### **Quality of the Personal Information**

TSI Capital Pty Ltd (First Mover) is committed to ensuring that your personal information that we hold is accurate, complete and up to date. To assist us with this, please contact us if any of the details you have provided change. Furthermore, if you believe that the information we have about you is not accurate, complete or up to date, please contact us and we will take all reasonable steps to correct the information.

## Privacy Complaints

If you wish to complain about any breach or potential breach of this privacy policy or the APPs, you should contact us, and request that your complaint be direct to the Director as follows:

The Director

TSI Capital Pty Ltd

Level 1, 513 Hay Street,

Subiaco, WA, 6008

Email: [admin@tsicapital.com.au](mailto:admin@tsicapital.com.au)

Phone: +61 (0)8 9388 8812

Your complaint will be responded to within 14 days. It is our intention to use our best endeavors to resolve any complaint to your satisfaction, however, if you are unhappy with our response, you are entitled to contact the Office of the Privacy Commissioner who may investigate your complaint further.

## On-line Privacy

TSI Capital Pty Ltd (First Mover) website may contain links to other Web sites whose operator may or may not adhere to a privacy policy or be governed by the APPs. We will not collect any information about you from our website except where you knowingly provide it to us. The information collected will depend on how you use the facilities on the website and may include some of the personal details stated above. For example, if you visit the website to browse or download information, our system will record the date and time of your activities, the information viewed and/ or downloaded. In the event that you enter information in the process of completing an email or any other on-line forms, the information will be collected by TSI Capital Pty Ltd (First Mover) if you submit the details. Our website uses cookies, which allow us to identify your browser while you are using our site. Cookies do not identify you; they simply allow us to track usage patterns so that we can measure the level of interest in various areas of our site. All browsers have a facility to notify you when you receive a cookie and you can elect to either accept it or not. Your internet service provider should be able to assist you to set your preferences. November 2007

## PRIVACY STATEMENT

TSI Capital Pty Ltd (First Mover) is committed to complying with the Privacy Amendment requirements introduced in 2012. TSI Capital Pty Ltd (First Mover) may collect information about you for the following purposes:

- Provision of investment services.
  - Completion of associated documentation and application forms.
  - To market services which may be supplied by the TSI Capital Pty Ltd (First Mover) or by other suppliers that may be of interest to you, unless you inform us not to do so.
  - To provide you with agreed services to assist in meeting your requirements, needs, goals and objectives
- As TSI Capital Pty Ltd (First Mover) provides a number of service offerings, we are required under various legislative bodies and codes of practice to collect certain information about you in order to provide our range of services. These include, but are not limited to, the Corporations Act, Income Tax Assessment Act as well as certain regulations issued by the Australian Securities and Investments Commission (ASIC). Whilst you are not obliged to provide us with the information requested, if you decline to do so, we may be unable to provide the level of service and advice required and expected of us. In connection with the provision of services, it may be necessary for us to disclose personal information about you to other professionals and organisations such as:
- Its parent company and other companies within the group.
  - Financial institutions (including fund managers, financial advisors, stock brokers).
  - Government departments e.g. Australian Taxation Office, ASIC and Centrelink as required by law.
  - External service providers and other compliance inspectors for audit purposes.
  - External parties for business acquisitions or in the event of the sale of the business.
  - Any other external party as authorised by you from time to time.

We undertake not to use or disclose information collected, for purposes other than those detailed above, or related purposes, unless the law requires the disclose or we have been provided with your consent to do so. TSI Capital Pty Ltd (First Mover) recognises how important the privacy of your personal information is to you. We will therefore, at all times, seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure. TSI Capital Pty Ltd (First Mover) is committed to ensuring that the personal information we hold is accurate, complete and up to date. If you believe that the personal information we hold about you is incorrect, we request that you contact us and we will take all reasonable steps to correct this information. If at any time you wish to have access to the information we hold about you, (or if you would like a copy of our detailed Privacy Policy) you are welcome to request this by contacting the Director on +61 (0)8 9381 8120 or by e-mail on [admin@tsicapital.com.au](mailto:admin@tsicapital.com.au).