

BLUE STAMP COMPANY PTY LTD – APP PRIVACY POLICY

Blue Stamp Company Pty Ltd (ACN 141 440 931) ('Blue Stamp') is committed to respecting the privacy of its Unitholders by ensuring that it manages any personal information it collects or holds in accordance with the Australian Privacy Principles ('APPs').

This APP Privacy Policy will be made available electronically on Blue Stamp's website (www.bluestampcompany.com). Blue Stamp will provide a copy of it free of charge and in any form reasonably requested (e.g. electronically or in hard copy).

Kinds of personal information Blue Stamp collects and holds

Blue Stamp will only collect an individual's personal information which is reasonably necessary for it to issue interests in its financial products and operate its financial services business. Such information may include an individual's personal and contact details. Without this information, Blue Stamp would not be able to issue its financial products and financial services to its Unitholders.

Can an individual remain anonymous when dealing with Blue Stamp

Given the nature of Blue Stamp's financial products and services, other than providing general publicly available information, it is not practical for Blue Stamp to deal with individuals who wish to remain anonymous or would prefer to identify themselves only by way of pseudonym.

How Blue Stamp collects and holds personal information

When collecting, using or disclosing personal information, Blue Stamp will take such steps as are reasonable in the circumstances to ensure that the information is accurate, up-to-date and complete.

Blue Stamp will only collect personal information in a lawful and fair manner. Wherever possible, personal information will be collected directly from the individual, unless it is unreasonable or impracticable to do so. It is not expected that Blue Stamp will collect sensitive information (e.g., health information), but if it is collected, it will only be done where the individual consents to the collection of that information.

If Blue Stamp receives unsolicited personal information, it will within a reasonable period assess whether it would otherwise have been entitled to collect the information in accordance with this APP Privacy Policy. If the personal information could have been collected by Blue Stamp, it will ensure that this APP Privacy Policy is complied with in respect of that information and it will notify the individual:

- (a) that the unsolicited personal information has been collected;
- (b) of the circumstances of that collection; and
- (c) provide access to a copy of this APP Privacy Policy.

If the personal information could not have been collected by Blue Stamp, it will destroy the information or ensure that the information is de-identified.

At or before the time or, if that is not practicable, as soon as practicable after, Blue Stamp collects personal information about an individual, Blue Stamp will ensure the individual is aware:

- (a) of Blue Stamp's identity and its contact details;
- (b) that the collection of personal information is permitted by Blue Stamp under the *Corporations Act 2001* and the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006*) and/or a particular court/tribunal order;

- (c) of the purpose for which Blue Stamp collects the personal information;
- (d) of the main consequences (if any) for the individual if all or some of the personal information is not collected;
- (e) of any other entity (or type of entity) to which Blue Stamp generally discloses the personal information it collects;
- (f) that Blue Stamp's APP Privacy Policy contains information about how the individual may:
 - (i) access and seek correction of the personal information about the individual that Blue Stamp holds; and
 - (ii) complain about a breach of the APPs and how Blue Stamp will deal with such a complaint; and
- (g) of whether Blue Stamp is likely to disclose the personal information to overseas recipients.

Unless permitted by law, Blue Stamp will not adopt a government related identifier (e.g., a tax file number) of an individual as its own identifier and it will only disclose such identifiers for the purposes of verifying the identity of the individual, or as permitted by law or as is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

Blue Stamp will ensure that in relation to any personal information it holds that it will take such steps as are reasonable in the circumstances to protect the information from:

- (a) misuse, interference and loss; and
- (b) unauthorised access, modification or disclosure.

If there is a suspected or actual data breach which may compromise personal information, Blue Stamp will promptly undertake an assessment of the incident. Where relevant, immediate steps will be taken to contain the breach. These steps may include limiting any further access or distribution of the affected personal information, or the possible compromise of other personal information.

If the unauthorised access, disclosure or loss of personal information is likely to cause serious harm to one or more individuals and the likely risk of serious harm has not been prevented by remedial action, Blue Stamp will notify affected individuals and the Office of the Australian Information Commissioner as soon as practicable. The notification will include Blue Stamp's identity and contact details, a description of the incident, the kind/s of information concerned and any recommended steps for affected individuals.

Following any data breach incident, Blue Stamp will undertake a review process to help prevent future breaches.

If Blue Stamp holds information which it no longer needs (for any purpose for which the information may be used or disclosed) or it is no longer required to keep, it will take such steps as are reasonable in the circumstance to destroy the information or to ensure that the information is de-identified.

The purpose for which Blue Stamp collects, holds, uses and discloses personal information

Blue Stamp collects, holds, uses and discloses personal information for the purposes of issuing interests in its financial products and operating its financial services business. This includes administering its registry of Unitholders (via an external service provider), providing appropriate financial services and communicating with Unitholders and other relevant parties.

Where Blue Stamp collects an individual's personal information for a particular purpose (i.e., the primary purpose), it will not use that information for another purpose (i.e., a secondary purpose) unless the individual has consented to the use or disclosure of that information or:

- (a) it would be reasonably expected that the information would be disclosed for a secondary purpose which is related to the primary purpose (and in relation to sensitive information for a secondary purpose which is directly related to the primary purpose); or
- (b) the use or disclosure of the information is legally required, specifically authorised by the APPs or reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

Blue Stamp will record in writing circumstances where it uses or discloses personal information for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

Personal information collected by one entity within the Blue Stamp group of companies may be used by another entity within the group provided that the personal information is held, used and disclosed for the same primary purpose.

Blue Stamp does not normally disclose personal information about its Unitholders to outside parties, except those contracted to provide services to Blue Stamp. These may include Blue Stamp's professional advisers and contracted service providers – e.g., registry, administrator, auditors, lawyers, custodian and consultants.

With consent, Blue Stamp will disclose personal information to a Unitholder's accountant, financial consultant or other person or organisation they nominate. Personal information may also be disclosed to the Australian Taxation Office or other government authorities or agencies as required by law.

If Blue Stamp uses or discloses personal information for direct marketing purposes, it will include a simple and free means of 'opting-out' of receiving future direct marketing material and it will ensure that it respects such requests, within a reasonable period and notifies any other organisation it is using to facilitate the direct marketing. If Blue Stamp has not collected the personal information directly from the individual, the 'opt-out' statement will be prominent. Blue Stamp will only use sensitive information for direct marketing purposes where the individual has provided consent for it to be used for that purpose.

If Blue Stamp uses personal information provided by a source other than the individual for direct marketing purposes, the individual may request Blue Stamp to provide details of the source of the information. Blue Stamp will provide this information free of charge and within a reasonable period.

If Blue Stamp uses the personal information for direct marketing purposes, it will ensure that it complies with the requirements of the *Do Not Call Register Act 2006*, the *Spam Act 2003* and the *Corporations Act 2001*.

How an individual may access and seek correction of personal information held by Blue Stamp

Generally, Blue Stamp will provide an individual with access to their personal information in a manner they request and within a reasonable period after the request is made. An individual can request Blue Stamp to correct any personal information it holds about that individual.

To apply for access or to request a correction to personal information, contact the **Director** by:

Writing to: Blue Stamp, Building 1, Level 1, 1 Breakfast Creek Rd, Newstead, Qld 4006

Visiting: Building 1, Level 1, 1 Breakfast Creek Rd, Newstead, Qld 4006

Calling: +61 7 3180 3826

Emailing: info@bluestampcompany.com

There are no charges for an individual requesting access to personal information. However, Blue Stamp may charge a fee to provide access, provided that such fee is not excessive.

As set out in the APPs, some exceptions apply. If Blue Stamp relies on one of the exceptions or is unable to provide the personal information in the manner requested by the individual, it will take such steps (if any) as are reasonable in the circumstances to give access in a way that meets the needs of both Blue Stamp and the individual and it will provide a written notice setting out:

- (a) the reasons for the refusal except to the extent that, having regard to the grounds for the refusal, it would be unreasonable to do so; and
- (b) the mechanisms available to complain about the refusal; and
- (c) any other relevant matter.

Having regard to the purpose for which the personal information is held, if Blue Stamp is satisfied that the information is inaccurate, out of date, incomplete, irrelevant or misleading or a request is received from an individual, Blue Stamp will take such steps as are necessary to correct that information. This will be done free of charge within a reasonable period after the request has been made. If Blue Stamp has provided the information to a third party, the individual may request Blue Stamp to notify that third party of that correction.

If Blue Stamp refuses to correct an individual's personal information it will provide a written notice to the individual setting out:

- (a) the reasons for the refusal except to the extent that, having regard to the grounds for the refusal, it would be unreasonable to do so; and
- (b) the mechanisms available to complain about the refusal; and
- (c) any other relevant matter.

If Blue Stamp refuses to correct an individual's personal information and the individual requests Blue Stamp to associate a statement that the information is inaccurate, out of date, incomplete, irrelevant or misleading with that information, Blue Stamp must take such steps as are reasonable in the circumstances to associate the statement in such a way that will make the statement apparent to users of the information. This will be done free of charge within a reasonable period after the request has been made.

How an individual can complain about a breach of the APP's and how the complaint will be dealt with

An individual may complain to Blue Stamp about a breach of the APPs by Blue Stamp by contacting the **Director** by:

Writing to: Blue Stamp, Building 1, Level 1, 1 Breakfast Creek Rd, Newstead, Qld 4006

Visiting: Building 1, Level 1, 1 Breakfast Creek Rd, Newstead, Qld 4006

Calling: +61 7 3180 3826

Emailing: info@bluestampcompany.com

The complaint will be handled in an appropriate, timely and courteous manner.

Is Blue Stamp likely to disclosure personal information to overseas recipients?

No, Blue Stamp is not likely to disclose personal information about an individual to an overseas recipient.

If at some future time, Blue Stamp chooses to disclose personal information about an individual to an overseas recipient, it will either obtain the individual's informed consent prior to doing so, will be required to do so by Australian law, or prior to doing so will take such steps as are reasonable in the circumstances to ensure that the overseas recipient does not breach the APPs (other than APP 1) in relation to the information.

Last updated: 16 June 2021