



Scheme Financial Vehicle Privacy Policy

Scheme Financial Vehicle Pty Ltd (ABN 97 662 496 479) (**SFV**) values and is committed to protecting your privacy.

SFV is subject to the *Privacy Act 1988* (Cth) (Privacy Act) and the Australian Privacy Principles in Schedule 1 to the Privacy Act.

SFV is committed to protecting the confidentiality of the personal information it collects and the privacy of the person to whom the information relates. This Privacy Policy sets out how SFV will manage personal information.

1 Why SFV collects and holds personal information

Personal information is information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not and whether recorded in material form or not.

The SFV will only collect and hold personal information for the purposes of performing its statutory functions and exercising its powers under the *Electricity Infrastructure Investment Act 2020* (NSW) (**EII Act**).

This may include personal information:

- required to enter into a contract with SFV
- for employment purposes, including undertaking, or applying to undertake, work or provide services on behalf of SFV
- required to assist in managing business and stakeholder relationships
- about individuals representing participants and industry associations in the energy industry
- provided in the course of SFV's operations
- provided to SFV by another person for the purpose of SFV performing its functions and exercising its powers
- required to ensure compliance with any relevant law
- provided to SFV during a situation that involves a threat to health and safety
- provided to SFV in a dispute resolution process, or for the purposes of a person establishing, exercising or defending a legal or equitable claim.

2 Types of personal information SFV may collect and hold

The types of personal information SFV collects and holds will vary depending on the purpose for its collection and may include:

- identifying information, such as a name and date of birth;
- contact details, such as email address or postal address;
- information for recruitment, employment and payroll purposes;
- any communications you send to us; and



- digital recordings, including images, video and audio recordings in which you may be identifiable.

3 How SFV may use and disclose personal information

SFV will use and disclose personal information for the purpose for which it was collected.

SFV may also use or disclose personal information for a related purpose, if the relevant individual would reasonably expect the use or disclosure. Examples of such situations include the use or disclosure of personal information:

- conducting risk management and due diligence assessments
- comply with legal and regulatory obligations including anti money laundering and counter terrorism laws
- required to investigate or prevent any suspected or alleged breach of applicable laws, rules or procedures
- required by SFV for any other purpose that SFV expressly states at the time of collection
- to address a situation that involves a threat to health and safety.

SFV may also use or disclose personal information with the consent of the relevant individual.

Sometimes SFV may need to disclose information to third party, such as:

- to AEMO Services Limited as Consumer Trustee under the EII Act, Equity Trustees Limited as the Financial Trustee under section 61 of the EII Act, and other key entities that SFV may work with to deliver its statutory functions
- referees, representatives and other people, an individual has authorised SFV to interact with on their behalf
- professional advisers who SFV engages to provide advice
- service providers SFV engages for the purpose of supporting its internal operations and performing its functions
- regulatory bodies and government agencies or other people as required by law
- enforcement bodies (as defined in the Privacy Act).

Where information is shared with these third parties, SFV will take all reasonable steps to ensure that third parties observe the confidential nature of such information including contractual obligations, security safeguards, access controls, and regular compliance monitoring. They are prohibited from using any or all of this information beyond what is necessary to assist SFV.

At this time, all third parties referred to above are located within Australia, however this may change in the future and if it does, SFV will update this privacy policy accordingly.

SFV does not carry out direct marketing and does not allow any personal information collected on the SFV's behalf to be used for direct marketing activities.



4 How individuals can access and correct their personal information

SFV will, on request, provide access to the personal information it holds about you, including for the purpose of correcting or updating that information, unless there is an exception to such disclosure which applies under relevant privacy legislation. If you require access to your personal information, please contact SFV as described in section 7 below. SFV will endeavour to respond to your request within 30 days.

In some circumstances, SFV is entitled to refuse an individual's request to access personal information, for example where:

- giving access may pose a threat to other individuals or unreasonably affect their privacy
- SFV is authorised or required to refuse access by law or court order
- giving access would disclose commercially sensitive information
- giving access is likely to prejudice enforcement activities by an enforcement body
- the request is frivolous or vexatious.

SFV takes reasonable steps to ensure that your personal information is accurate, complete, and up to date whenever SFV collects or uses it. If the personal information SFV holds about you is inaccurate, incomplete, irrelevant or out-of-date, SFV will take reasonable steps to either correct this information, or if necessary, discuss alternative action with you.

If SFV refuses to provide you with access to your information or refuse a request to correct your information, SFV will provide you with reasons for the refusal and inform you of any exceptions relied upon under the Australian Privacy Principles (unless it would be unreasonable to do so).

5 Protecting and storing your personal information

SFV is committed to protecting your personal information. SFV takes appropriate security measures to protect your personal information from misuse, interference or loss, and from unauthorised access, modification or disclosure. This may include the use of technologies and processes such as access control, network firewalls, encryption and physical security to protect the privacy of your personal information.

SFV may store your personal information under outsourcing arrangements with the providers of our technology platforms that need to adhere to SFV's cyber security requirements within our vendor selection approach and ongoing IT operations. These outsourcing arrangements require technology platform providers to store personal information on secure electronic databases located in Australia.

6 Change of policy

SFV may update this Privacy Policy from time to time, to reflect changes to our standard practices and procedures or where necessary to comply with new laws and regulations. The latest version of this Privacy Policy will always be available on www.schemevehicle.com.au.



7 Enquiries or complaints

If you want more information about the way SFV manages personal information or to request access to your personal information, please email enquiries@schemefinancialvehicle.com.au.

If you have a complaint about a potential breach by SFV of the Australian Privacy Principles, please email enquiries@schemefinancialvehicle.com.au with the subject 'Privacy Complaint – SFV – Attn Privacy Officer, providing details of the relevant personal information and the alleged breach.

SFV will investigate your complaint and endeavour to respond in writing within 30 days. The response will explain whether SFV considers it has breached an Australian Privacy Principle and, if so, SFV's proposed course of action. If you do not receive a response from SFV within 30 days, or you are not satisfied with the response you can make a complaint to the Office of the Australian Information Commissioner (OAIC). Contact details can be found at the OAIC's website: www.oaic.gov.au