

Privacy Policy – December 2017

How do we collect your personal information?

Personal information can be collected using a number of methods that includes; the investor, persons completing an application form, persons providing information on the BFML website, or through BFML's use of cookies.

The information provided directly by investors (or by an adviser acting as their agent) in application forms or on the BFML website is required so that BFML can provide investment services to the investor.

The collection of personal information can also be done indirectly using cookies when an investor or other person browses or utilises the BFML website. Cookies are used to monitor the browser history of people when viewing the BFML website.

What personal information do we collect and hold?

The kinds of personal information that we may collect, and hold include your name, date of birth, address, phone number, bank account details and Tax File Number (TFN).

We can also collect personal information about your internet usage and browser history in relation to our website via the use of cookies.

If we are no longer authorised or required by law to do so, we will not retain your personal information for any purpose for which we may lawfully use or disclose it.

How do we use your personal information?

By providing us with your personal information, you consent to us using, disclosing and otherwise handling your personal information in accordance with this Privacy Policy as updated from time to time. BFML may use this information to administer, manage and generally service your investment including any legislative and regulatory requirements. This will enable us to provide customer service and administrative information, including;

- sending ad hoc marketing communications which we believe may be of interest to you;
- personalising your experience on our websites; and
- identifying usage trends and ongoing website enhancements for broader business purposes.

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BFML may use information about your internet usage and browser history in relation to the BFM financial products to enable full functionality to you and to help us improve the financial services we offer or market to you.

All external communications made based on collecting your personal information will include the ability to easily opt-out (unsubscribe) at any time, with the exception of operationally critical information which we are legally obliged to communicate. In receiving or remaining silent in confirming receipt, you are not bound or consenting to any further materials or obligations.

Who do we provide your personal information to?

BFML is only permitted to use and disclose your personal information for purposes that can be directly related to the financial services that we are authorised to provide. As such, the permitted purposes include:

- internal accounting, record keeping and auditing;
- unit registry;
- performance monitoring; and
- data carrying.

BFML outsources the collection of investors' personal information to third parties we appoint as administrators who are in Australia. The administrators' details are contained in the application form.

Our administrators may use and disclose your personal information for a permitted purpose which may involve the transfer of your personal information outside of Australia (including to countries where there may be less stringent data protection laws) to process personal information on our behalf. Where this is the case, it is not possible to ensure that the overseas recipient does not breach the APPs in relation your personal information. In providing us with your personal information, you consent to the possibility that your personal information may be transferred outside of Australia for processing.

We may also share personal information with the following parties for permitted purposes:

- our related parties within the Bennelong Group of companies;
- third parties we appoint as custodians located in Australia;
- an agent and/or adviser appointed by an investor;
- government authorities when required by law; and
- third party data carrying service providers that enable access to investors' personal and investment information by their appointed advisers.

Provision of your personal information?

BFML takes reasonable steps to ensure the personal information about an investor that we collect, use or disclose is accurate, complete and up to date.

Investors and advisers may request access to the personal information BFML and our service providers hold about them. They may also request that we amend or correct information, however we are not obliged to make those changes or provide such information where the law stipulates or provides us with the discretion to refuse.

You can request access to or changes to your personal information by telephone or by writing to the Privacy Officer of BFML (please ensure you include the name of the fund in which you are invested):

Bennelong Funds Management Ltd
Privacy Officer
The Responsible Entity (or Trustee) of the [name of Fund]
Bennelong House

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Level 1, 9 Queen Street
Melbourne VIC 3000

Telephone: 1800 895 388 (Aust) or 0800 442 304 (NZ)

Email: client.services@bennelongfunds.com

Details of Responsible Entity (or Trustee)

Bennelong Funds Management Ltd

ABN 39 111 214 085

AFS Licence Number 296806

Complaints

BFML treats complaints concerning privacy in the same manner as any other complaint about our products or services.

Please contact the Privacy Officer using the details provided above.

BFML will acknowledge your complaint within 10 business days of receipt and will endeavour to resolve the complaint within 30 days. If BFML has not resolved the complaint within 30 days, or you are dissatisfied with the outcome of our internal complaints process, you have the right to contact the Office of the Australian Information Commissioner (OAIC) about your complaint via their online Privacy Complaint Form, available at: oaic.gov.au/privacy/making-a-privacy-complaint