

CVS Lane Capital Partners Pty Ltd

Privacy Policy

1 Introduction

CVS Lane Capital Partners Pty Ltd (ABN 81 155 490 154 and AFSL 421125) and its related bodies corporate (collectively, **CVS Lane, we, us or our**) recognises that your privacy is very important and we are committed to, and understand the importance of protecting the personal information we collect from you.

In handling your personal information, we are required to comply with the *Privacy Act 1988* (Cth) (**Privacy Act**) and the 13 Australian Privacy Principles (**APPs**) under the Privacy Act.

This privacy policy sets out how we aim to protect the privacy of your personal information, your rights in relation to your personal information managed by us and the way we collect, hold, use and disclose your personal information.

We regularly review our practices and procedures regarding how we manage personal information. As a result, this policy may be updated from time to time. Where we update this policy we will make the updated policy available, including on our website.

Information about how CVS Lane manages credit related personal information is set out in the CVS Lane Credit Information Policy. A copy of the CVS Lane Credit Information Policy is available at www.cvslane.com.au or can be obtained by contacting CVS Lane (including using the contact details in section 9 of this privacy policy).

2 What kinds of personal information do we collect?

Personal information is information or an opinion about an identified, or reasonably identifiable individual. During the provision of our services, we may collect your personal information.

The kinds of personal information that we collect will vary depending on the type of dealings we have with you and how you interact with us.

For example, if you invest in a fund or other product of CVS Lane, the kinds of personal information we may collect include:

- your contact information, such as your name, address, telephone number and email address;
- your gender and date of birth;
- details regarding your country of residence;
- details regarding any investment you make in our funds or other financial products or services;
- income, occupation and employment history information;
- taxation details; and
- bank account information and other accounting, audit and financial services related information.

Where you request information from us, we may collect your name and contact details or other information necessary to fulfil the information request.

Generally, we do not collect sensitive information about individuals. If we do need to collect sensitive information about you, we will only do so with your consent or where we are required to do so by law. Information about your health, racial or ethnic origin, political persuasions, criminal record and religious or philosophical beliefs are all examples of sensitive information.

Please refer to the CVS Lane Credit Information Policy for details regarding the types of credit related personal information that CVS Lane collects. A copy of the CVS Lane Credit Information Policy can be obtained by contacting CVS Lane.

3 How do we collect personal information?

There are a number of circumstances in which CVS Lane will collect personal information from you. For example, CVS Lane may collect personal information:

- (a) where you request information from CVS Lane regarding CVS Lane or our funds or other financial products or services;
- (b) where you apply to invest in funds or other financial products or services of CVS Lane;
- (c) as part of CVS Lane providing our funds management or other financial products or services to you;
- (d) as part of CVS Lane administering any investment you make in our funds or other financial products or services; or
- (e) where you request CVS Lane to provide credit to you or a company or other entity you are associated with (further details regarding the collection of credit related personal information are set out in the CVS Lane Credit Information Policy).

Generally, we collect personal information directly from you:

- through the use of any of our standard forms;
- via email; or
- through telephone conversations or other direct communications with you.

There may be occasions when CVS Lane will collect your personal information from a third party. For example CVS Lane may collect your personal information from a publicly maintained record, a third party broker, a person authorised by you (such as your accountant or financial advisor) or our agents or service providers.

If we do not collect personal information directly from you, we will endeavour to notify you about the collection in advance, or where that is not possible, as soon as reasonably practicable after the personal information has been collected.

4 Why do we need your personal information?

CVS Lane collects, holds, uses and discloses your personal information where it is reasonably necessary for the purposes of:

- providing you with information regarding the funds and other financial products or services of CVS Lane;
- processing any application you make for investment in our funds or other financial products or services;
- establishing and administering any investment you have with us in our funds or other financial products or services, including communicating with you about your investment;

- providing you with advice and associated services;
- assessing and processing any application you make for CVS Lane to provide you with credit and administering any credit CVS Lane provides (further details regarding our use of credit related personal information are set out in the CVS Lane Credit Information Policy);
- acting as your agent if you request us to do so;
- accounting, billing and other internal administrative purposes;
- developing and facilitating our relationship with you;
- providing you with promotional information about us, our related entities and other organisations that we have affiliations with; and
- analysing our products and services and customer needs with a view to developing new and/or improved products and services.

We may also collect, hold, use and disclose personal information to undertake identification and verification processes in accordance with the *Anti-Money Laundering and Counter Terrorism Financing Act* or any other relevant laws. For certain investors, we may also be required to collect and disclose certain personal information to the Australian Taxation Office in order to comply with the *Foreign Account Tax Compliance Act (FATCA)*.

You are under no obligation to provide your personal information to us. However, without receiving certain information from you, we may not be able to provide our products or services to you and may not be able to process any application by you for investment in our funds or other financial products or services.

5 Who do we disclose your personal information to?

Generally we will only disclose your personal information to third parties for a purpose related to the provision of our funds management or other services or any related purposes within your reasonable expectations. We may also disclose your personal information to third parties for other purposes with your consent or if the disclosure is required or authorised by law.

The types of organisations we may disclose your personal information to include:

- prospective funders or other intermediaries in relation to any finance requirements you have;
- underwriters we may use in relation to our financial products and services;
- third parties who provide services to you relevant to your investment in our funds or other financial products or services (where you request us to make such disclosure);
- government authorities were required to by law, such as under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)*;
- third party service providers we engage to assist us in providing our funds management services or other financial products or services including such service providers we may engage to provide custody, administration, identity verification, technology, auditing, mailing, printing or other relevant services;
- related bodies corporate of CVS Lane (such as subsidiaries or holding companies of CVS Lane) or other third parties that CVS Lane has a commercial arrangement with, for the purpose of advising you of special offers or promotions or otherwise notifying you of other products or services that we believe may be of interest to you;
- our professional advisors (including legal, financial or insurance advisors);or

- any entity that acquires our business or assets or any entity that may wish to acquire, or have acquired, an interest in our business, the benefit of any contracts entered into by us or any rights under an account or agreement you have entered into with us.

6 Overseas disclosure

We do not disclose your personal information to recipients located overseas (ie outside of Australian borders).

If in the future, we decide to disclose personal information to an overseas recipient, we will update this privacy policy regarding the likely disclosures (including, if it is practical to do so, the countries in which such overseas recipients are likely to be located).

7 Direct marketing

We may collect, use and disclose your personal information to inform you of products, services or offers of CVS Lane, our related bodies corporate or other parties that we have a commercial arrangement with which we consider may be of interest to you. Where you are an investor in a fund or other financial product or service of CVS Lane, this may include providing you with direct marketing information regarding the other funds, products or services of CVS Lane or our related companies.

If you do not want to receive this information or do not want us to use or disclose your personal information for direct marketing purposes, you can opt out by letting us know that you wish to opt out of receiving this information and/or CVS Lane using or disclosing your personal information for direct marketing purposes.

8 Security of your personal information

We take steps reasonable in the circumstances to ensure that the personal information we hold is protected from misuse, interference and loss and from unauthorised access, modification or disclosure. We store your personal information in different ways, including paper and electronic form.

Personal information is held on secured servers or in storage located in controlled, access restricted environments. Our employees are obligated to maintain the confidentiality of any personal information held by us.

Personal information may also, in certain circumstances, be held on behalf of CVS Lane in hard copy or electronic forms by CVS Lane's service providers (such as offsite document storage providers or electronic data storage providers). CVS Lane enters into agreements with such service providers which impose confidentiality and privacy obligations on the service provider.

CVS Lane will destroy or de-identify personal information in circumstances where it is no longer required, unless we are otherwise required or authorised by law to retain the information.

9 Correcting, accessing or updating your personal information

CVS Lane takes reasonable steps to ensure the personal information we collect is kept up-to-date, accurate and complete.

If your personal information changes (such your name or address), you can contact us and let us know of the change. Please contact our Privacy Officer using the following details:

The Privacy Officer
CVS Lane Capital Partners Pty Ltd
Level 9 South, 161 Collins Street
Melbourne Victoria 3000
Phone: 03 9016 7233
Email: info@cvslane.com.au

You have a right to request:

- access to personal information we hold about you; and
- correction to personal information we hold about you that is incorrect, inaccurate, out of date, incomplete, irrelevant or misleading.

You can make a request by contacting our Privacy Officer using the contact details above. To protect your privacy and the privacy of others, we may need to verify your identity before granting access or making corrections to your personal information.

10 Links to other websites

Our websites may contain links to other sites. We are not responsible for the privacy practices or content of other sites. We encourage you to be aware when you leave our site and to read the privacy statements of each website that we may provide a link to on our website.

Also, our web site may use cookies. The main purpose of cookies is to prepare customised web pages or content for users. Cookies do not identify you personally, but they may link back to a database record about you. We use cookies to monitor usage of our web site and to create records of when users visit our web site and what pages users view so that we may provide information, content and services tailored for that user. We will not be able to identify any particular individual from the information we collect as a result of our use of cookies.

Other companies may from time to time place advertising or links on our web-site and may collect information about you when you view or click on their advertising or content through the use of cookies. Due to the technical operation of the internet, we cannot control this collection of information and are not responsible for this collection, use or disclosure. You should contact these advertisers or content providers if you have any questions about their use of the information they collect.

11 Privacy Complaints

Please direct all privacy complaints to our Privacy Officer. A privacy complaint may relate to any concern or dispute you may have with our privacy practices. This could include matters such as:

- how your personal information is collected;
- how your personal information is stored;
- how your personal information is used or disclosed; or
- how access to your personal information is provided.

You can also make a privacy complaint to us if you consider that we have breached the Privacy Act, the APPs or any relevant APP Code (such as the Privacy (Credit Reporting) Code).

At all times, privacy complaints will:

- be treated seriously;
- be dealt with promptly;
- be dealt with in a confidential manner; and
- not affect your existing obligations or affect the commercial arrangements between you and us.

Our Privacy Officer will commence an investigation into your complaint promptly. You will be informed of the outcome of your complaint following the completion of the investigation. In the event you are dissatisfied with the outcome of your complaint, you may refer the complaint to the Office of the Australian Information Commissioner.