

## CVS Lane Capital Partners Pty Ltd

### Privacy Policy

Publication Date: December 2022

#### 1 Introduction

CVS Lane Capital Partners Pty Ltd (ABN 81 155 490 154 and AFSL 421125) and its related bodies corporate (collectively, **CVS Lane**) understand the importance of protecting the privacy of an individual's personal information.

In handling your personal information, CVS Lane will comply with the *Privacy Act 1988* (Cth) (**Privacy Act**) and the 13 Australian Privacy Principles (**APPs**) in the Privacy Act.

This policy sets out how CVS Lane aims to protect the privacy of your personal information, your rights in relation to your personal information managed by CVS Lane and the way CVS Lane collects, holds, uses and discloses your personal information.

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](http://www.cvslane.com.au) or can be obtained by contacting CVS Lane (including using the contact details in section 8 of this privacy policy).

This policy may be updated from time to time.

#### 2 What kinds of personal information does CVS Lane collect?

Personal information is information or an opinion about an identified, or reasonably identifiable individual. During the provision of its products and services, CVS Lane may collect your personal information.

The kinds of personal information CVS Lane collects will vary depending on the type of dealings we have with you and how you interact with CVS Lane.

Generally, the kinds of personal information CVS Lane may collect include:

- your contact and identification information, such as your name, address, telephone number, email address, gender and date of birth;
- details regarding your country of residence;
- details regarding any investment you make in CVS Lane funds or other financial products or services;
- your income, occupation and employment history information;
- your IP addresses, browser types, access times and touchpoints in CVS Lane's online system;
- your tax details;
- your bank account information and other accounting, audit and financial services related information;
- where you are acting on behalf of another entity (whether as an employee, director or other representative), details of that entity and your relationship with it;

- other personal information and sensitive information including health information:
  - where you consent to the collection of such information and if relevant to the provision of CVS Lane products or services; or
  - where you are applying for an employment position with CVS Lane and it is relevant to the recruitment process through which you must progress following your application to CVS Lane (for example, background checks, including financial background checks, and criminal record information, information about your education and work history, qualifications and skills, and the opinions of others about your work performance); or
  - where you are applying for an employment position with CVS Lane, and it is relevant to CVS Lane's assessment of whether you are able to perform the inherent requirements of the particular role.

In some circumstances CVS Lane may also hold other personal information provided by you.

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

If CVS Lane needs 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.

### **3 How does CVS Lane 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:

- where you request information from CVS Lane regarding CVS Lane or its funds or other financial products or services;
- where you apply to invest in funds or other financial products or services of CVS Lane;
- as part of CVS Lane providing our funds management or other financial products or services to you;
- as part of CVS Lane administering any investment you make in our funds or other financial products or services; or
- 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, CVS Lane collects personal information directly from you:

- through the use of any of CVS Lane's standard forms;
- via email; or
- through telephone or video conversations or other direct communications with you.

There may be occasions when CVS Lane will collect your personal information from sources other than you. 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 CVS Lane agents or service providers. Generally, CVS Lane will only collect your personal information from sources other than you if it is unreasonable or impracticable to collect your personal information from you or with your authorisation.

#### **4 Why does CVS Lane 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 CVS Lane funds or other financial products or services;
- establishing and administering any investment you have with us in CVS Lane funds or other financial products or services, including communicating with you about your investment;
- providing and facilitating the provision of other products and services to you or an entity you represent;
- 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 CVS Lane's 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 CVS Lane's relationship with you;
- providing you with promotional information about CVS Lane, and other organisations that CVS Lane has affiliations with;
- analysing CVS Lane products and services and customer needs with a view to developing new and/or improved products and services; and
- any other legal requirements, for example 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).

CVS Lane may also use your personal information for purposes related to the above purposes and for which you would reasonably expect CVS Lane to do so in the circumstances, or where you have consented or the use is otherwise in accordance with law.

Where personal information is used or disclosed, CVS Lane takes steps reasonable in the circumstances to ensure it is relevant to the purpose for which it is to be used or disclosed. You are under no obligation to provide your personal information to CVS Lane. However, without certain information from you, CVS Lane may not be able to provide CVS Lane products and/or services to

you and may not be able to access, process and/or approve any application that you, or an entity you represent or guarantee, make for investment in CVS Lane funds or other financial products or services.

## 5 Who does CVS Lane disclose your personal information to?

CVS Lane discloses your personal information for the purpose for which CVS Lane collects it. This may include, for example, disclosing your personal information for a purpose related to the provision of CVS Lane funds management, products or services.

In some circumstances, CVS Lane may disclose personal information to overseas recipients (including but not limited to recipients in the United States, Singapore, United Kingdom and European Union) to provide its products and/or services and for administrative or other business management purposes. Where this occurs, CVS Lane take steps to protect the privacy of your personal information.

Overseas recipients may have different privacy and data protection standards. However, before disclosing any personal information to an overseas recipient, CVS Lane takes steps reasonable in the circumstances to ensure the overseas recipient complies with the Australian Privacy Principles or is bound by a substantially similar privacy scheme, unless you consent to the overseas disclosure or it is otherwise required or permitted by law.

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

- prospective funders or other intermediaries in relation to any finance requirements you have;
- underwriters CVS Lane may use in relation to its financial products and services;
- third parties who provide services to you relevant to your investment in CVS Lane 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 CVS Lane engages to assist us in providing CVS Lane 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); and
- any entity that acquires CVS Lane business or assets or any entity that may wish to acquire, or has acquired, an interest in CVS Lane business, the benefit of any contracts entered into by us or any rights under an account or agreement you have entered into with us.

If you have any queries or objections to such disclosures, please contact CVS Lane Privacy Officer on the details set out in paragraph 8.

CVS Lane's disclosures of your personal information to third parties are on a confidential basis or otherwise in accordance with law.

## **6 Direct marketing**

CVS Lane may collect, use and disclose your personal information to inform you of products, services or offers of CVS Lane, 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.

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.

## **7 Security of your personal information**

CVS Lane takes steps reasonable in the circumstances to ensure that the personal information it holds is protected from misuse, interference and loss and from unauthorised access, modification or disclosure. CVS Lane holds your personal information in both hard copy and electronic forms in secure databases on secure premises, accessible only by authorised staff.

CVS Lane employees are obligated to maintain the confidentiality of any personal information held by us. If other organisations provide support services to us, CVS Lane requires them to take technical and organisational measures to secure the privacy of the information we have provided to them.

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.

## **8 Correcting, accessing or updating the personal information that CVS Lane holds**

CVS Lane takes reasonable steps in the circumstances to ensure the personal information it holds is up-to-date, accurate, complete, relevant and not misleading. You may access and seek correction of your personal information that is collected and held by CVS Lane.

If at any time you would like to access or correct the personal information that CVS Lane holds about you, or you would like more information on CVS Lane's approach to privacy, please contact CVS Lane's Privacy Officer on the details below.

The Privacy Officer  
CVS Lane Capital Partners Pty Ltd  
Level 32 South, 120 Collins Street  
Melbourne Victoria 3000  
Phone: +613 9016 7233  
Email: [info@cvslane.com.au](mailto:info@cvslane.com.au)

To obtain access to your personal information:

- (a) you will have to provide proof of identity to ensure that personal information is provided only to the correct individuals and that the privacy of others is protected;
- (b) CVS Lane requests that you be reasonably specific about the information you require; and
- (c) CVS Lane may charge you a reasonable administration fee, which reflects the cost to CVS Lane for providing access in accordance with your request.

CVS Lane will endeavour to respond to your request to access or correct your personal information within 30 days from your request.

CVS Lane will grant access to the extent required and take steps reasonable in the circumstances to correct personal information where necessary and appropriate.

## **9 Links to other websites and cookies**

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

The CVS Lane website may use cookies to store a log file on your computer which is retained for technical and statistical purposes only. Cookies do not identify you personally, but may link back to a database record about you. Cookies are a feature of your Internet browser that you can disable at any time. However, if a browser does not accept cookies or if you reject a cookie, some portions of CVS Lane's online services may not function properly.

## **10 Privacy Complaints**

Please direct all privacy complaints to CVS Lane's Privacy Officer. 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 CVS Lane.

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.

This policy was last reviewed in December 2022.