



Privacy Policy

March 2014

General

Overview

Vinva Investment Management Limited (“Vinva”) in its capacity as an Australian Financial Services Licensee has an obligation to have in place adequate arrangements for the protection of an individual’s right to privacy and is committed to operating in a manner that is in accordance with the Australian Privacy Principles (APPs) contained in the *Privacy Act, 1988* (“Act”).

This policy document outlines Vinva’s framework designed to meet these privacy requirements, while recognising the need for Vinva employees and external service providers (“service providers”) to manage personal information in an effective and efficient manner.

1. Introduction and objectives

Vinva recognises that individuals have an interest in protecting their privacy and ensuring that information collected in relation to them is handled in an appropriate way. It understands that, due to the nature of its operations, Vinva and its service providers will be required to collect and hold personal information about its employees, clients, suppliers, sub-contractors and others with whom it deals. Vinva is therefore committed to having in place adequate arrangements for the protection of an individual’s right to privacy and that it operates in a manner that is consistent with the spirit of the Act.

The provisions of the Act centre around the 13 Australian Privacy Principles (APPs) (Refer to <http://www.oaic.gov.au/privacy/privacy-resources/privacy-fact-sheets/other/privacy-fact-sheet-17-australian-privacy-principles>) that sets out how organisations collect, use, secure and disclose personal information. These principles give individuals a right to know what information an organisation holds about them and a right to correct that information if it is wrong.

As such, this policy and procedure has been developed as part of Vinva’s compliance framework to ensure Vinva manages personal information that they deal with in accordance with the privacy requirements at all times.

1.2 Scope

This policy applies to all of Vinva including any activity which is outsourced to a third party, including related entities.

This document should be read in conjunction with other Vinva policies and procedures and applicable Vinva related entities policies and procedures. Where a direct conflict exists between this document and a related entity’s policy and procedure, this policy will apply.

Privacy Policy

By visiting our website, using any of our services or otherwise providing us with your personal information (or authorising it to be provided to us by someone else), you agree to your personal information being handled as set out in this Privacy Policy.

Revisions to this Privacy Policy

Vinva may update this Privacy Policy from time to time so please review it periodically for changes on our website at www.vinva.com.

Your continued use of our services, requesting our assistance or the provision of further personal information to us (directly or via an authorised person) after this Privacy Policy has been revised, constitutes your acceptance of the revised Privacy Policy.

What personal information does Vinva collect?

Vinva only collects personal information that is necessary to assist us in providing our services to our clients. Vinva generally collects personal information such as name, phone numbers, address, email address, banking details, date of birth, country of residence, investment details, authorised signatories, taxation details (including Tax File Number) and other accounting, audit and financial services related information.

If you provide us with personal information that we have not requested (unsolicited personal information) we will, unless otherwise required or permitted by law, delete or destroy it as soon as possible after receiving it.

In certain circumstances we may be required or permitted by law or Court or Tribunal order to collect certain personal information about you. For example, we may need to collect your name, residential address, country of residence, date of birth, business name (if any), directorship appointments (if any) and other types of personal information required by law, including (but not limited to) information required under the following:

- *Anti-Money Laundering and Counter-Terrorism Financing Act 2006 and Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007 ("AML/CTF Laws")*
- *Income Tax Assessment Act 1997 / Tax administration Act 1953*
- *Superannuation Industry (supervision) Act 1993*

You do not have to provide us with your personal information but if you do not provide us with the personal information that we need, we may not be able to provide our services or assistance to you or our clients on your behalf.

How does Vinva collect personal information?

Vinva may collect your personal information in various ways, including via telephone, our website, application and redemption forms, email or hardcopy and/or online forms. In most situations we collect your personal information directly from you.

However, we may also collect information from third parties, such as fund administrators, custodians, consultants, trustees and/or anyone you have authorised to deal with us on your behalf.

Depending on the type of service requested, we may also seek to collect information about someone else from you. However, you must not provide us with personal information about another person unless you have clear consent from that person to do so, have told them that their personal information will be handled in accordance with this Privacy Policy and where they can find it.

On all occasions personal information is collected, held, used and disclosed by us in accordance with this Privacy Policy.

Why does Vinva collect and use personal information?

Vinva only collects, holds and uses personal information for the purposes for which it was provided (which will normally be obvious at the time of collection), related purposes or as permitted or required by law. Such purposes may include:

- Establishing, maintaining and administering your account;
- conducting verifications, monitoring and reporting required under the AML/CTF Laws;
- recording tax information such as TFN, ABN, country of residence in order to report to the ATO (and other relevant bodies as required by law) and withhold tax correctly from payments
- communicating with you or your custodian/consultant regarding the status of your unit /share holdings, value, distributions or responding to your and/or your custodian/consultant's enquiries / information requests;
- processing authorised payments to and from you;
- providing you and/or your custodian/consultant with the services requested; and
- any other uses identified at the time of collecting your personal information.

Who does Vinva disclose personal information to?

Any personal information provided to us may be disclosed, if appropriate, to other entities in order to facilitate the purpose for which the information was collected. Such entities generally include:

- the Australian Taxation Office for the purpose of legislative compliance and reporting;
- the Australian Securities and Investments Commission (ASIC), the Australian Stock Exchange (ASX) for the purpose of legislative compliance and reporting;
- third party service providers for the purpose of enabling them to provide a service such as our administrator, auditors, consultants, financial institutions and other professional advisers;
- other government bodies, regulators, law enforcement agencies and any other parties where authorised or required by law;
- other entities if you have given your express consent; and
- any other entities identified at the time of collecting your personal information or to which we are legally required to disclose your personal information.

Vinva may also subcontract services to companies located in countries outside of Australia (ie Hong Kong and the Cayman Islands). Our contracts with these parties generally include an obligation for them to comply with Australian privacy law and this Privacy Policy. However you acknowledge that, by agreeing to the disclosure of your personal information to these entities outside of Australia, we will no longer be required to take reasonable steps to ensure the overseas recipient's compliance with the Australian privacy law in relation to your personal information and we will not be liable to you for any breach of the Australian privacy law by these overseas recipients. On this basis, you consent to such disclosure.

How does Vinva protect personal information?

We take reasonable steps to protect any personal information that we hold from misuse, interference and loss and from unauthorised access, alteration and disclosure. For example, we implement the following security measures:

- security procedures for access to our business premises;
- security procedures within our offices;
- IT security procedures including password protection, user logins, firewalls, intrusion detection and site monitoring; and
- mandatory confidentiality guidelines for all staff within the business (as outlined in employment contracts).

However, data protection measures are never completely secure and, despite the measures we have put in place, we cannot guarantee the security of your personal information. You must take care to protect your personal information. You should notify us as soon as possible if you become aware of any security breaches.

Accessing your personal information held by Vinva

You may access personal information we hold about you, subject to a small number of legal restrictions or exemptions. Where such restrictions or exemptions exist we will advise you of those reasons at the time of your request.

If you wish to access the personal information we hold about you or request correction of it, you should contact Vinva using the contact details below.

While we do not charge you for a request for accessing your personal information you should be aware that we may charge a reasonable fee (which will be notified to you once you make a request) for time and cost in the following circumstances:

- if an extended amount of time is required to collate and prepare material for you; and
- if you wish to have your files photocopied for you.

How can you correct and update your information?

We take reasonable steps to ensure that the personal information we hold about you is accurate, complete and up-to-date. However, we also rely on you to advise us of any changes to your personal information.

Please contact us using the contact details below as soon as possible if there are any changes to your personal information or if you believe the personal information we hold about you is not accurate, complete or up-to-date so that we can update your file accordingly.

What do you need to do if you have a complaint?

If you wish to make a complaint about a breach of this Privacy Policy or the privacy principles of the Privacy Act 1988 you can contact us using the contact details below. You will need to provide us with sufficient details regarding your complaint together with any supporting evidence.

We will refer your complaint to Vinva's Compliance Officer who will investigate the issue and determine the steps (if any) that we will undertake to resolve your complaint. We will contact you if we require any additional information from you and will notify you in writing of the outcome of the investigation as soon as practicable and, in general, no later than 30 days after the receipt of the initial complaint.

If you are not satisfied with our determination, you can contact us to discuss your concerns or complain to the Australian Privacy Commissioner via www.oaic.gov.au.

Contact us

If you have a query relating to this Privacy Policy or wish to make a complaint, please contact us using the following contact details:

Attn: The Privacy Officer
Vinva Investment Management Limited
Level 13
10 Bond Street
Sydney NSW 2000

Ph: (02) 8298 4700

Email: vinvaclientnotifications@vinva.com