



Tacking Point Asset Management Privacy Policy

Privacy

Tacking Point and its related entities are bound by Privacy Laws and are committed to protecting your personal information. This Privacy Policy explains how we manage, store and access your personal information, including our obligations and your rights in respect of our dealings with your personal information. We will use your personal information for the primary purpose of administering your investment and conducting research and marketing to you when they apply for, and in the course of administering, any investment of any financial product (such as our managed investment schemes generally known as managed funds or schemes) we operate.

This information from you can include the personal information or sensitive information (as defined below), as well as other personal information that you provide to us from time to time in connection with your investment. Where possible, we will collect personal information directly from you or an agent of you. However, it may be necessary for us to collect personal information about you from other sources for the purposes of verifying your identity or otherwise conducting checks for the purpose of compliance with the Anti-money Laundering Laws as noted under the heading "Relevant Laws" below as detailed below.

Personal information

"Personal information" is information or opinion about an identified individual, or an individual who is reasonably identifiable. We collect and hold personal information that is reasonably necessary for, or directly related to, one or more of our functions or activities as a Responsible Entity of managed investment schemes (generally known as managed funds or schemes) and other products we offer. This information may include (as well as other information):

- your full name and date of birth;
- your contact details including residential address;
- your employment details, employment history and salary information;
- your tax file number;
- your investment history; and
- your nominated beneficiary details (as is applicable to the product sought for access).

"Sensitive information" is information or opinion about an individual that is:

- personal information which is also information or an opinion about the individual's racial or ethnic origins, political opinions, political association membership, religious beliefs or affiliations, philosophical beliefs, professional or trade association membership, trade union membership, sexual orientation or practices, or criminal record; or
- health, genetic or biometric information about the individual.

We will only collect sensitive information about you with your consent, except where we are required or permitted by law to collect your sensitive information without your consent and we require this to accept an application from you for investment.

Collection and use

Purpose

We collect and/or use personal information about an investor so that we can admit you as a unit holder of our managed funds and provide you with services and benefits in connection with that managed fund or other products we offer.

You also have the right to refuse to provide us with personal information but if you decide to do this we may be unable to admit you as a member of our managed funds or provide you with services and benefits in connection with your membership of our managed funds for example, we will need to collect your Australian tax file number ("TFN") or Australian Business Number ("ABN") and related information.

We collect your TFN, for the purpose of paying distributions to you without withholding tax, as permitted by tax laws.

As noted above, if you do not provide us with your TFN or ABN it is not an offence for you to withhold this information.

However, if you choose not to provide us with your TFN or ABN and do not have an exemption, we must deduct tax at the highest personal tax rate, plus the Medicare levy, before passing on any distribution to you.

Method of collection

We only collect personal information by lawful and fair means. This information will generally come from what has been provided in your application form, or through our contact with you or your employer or adviser or agent to you or through a third party to access your application. We or our Administrator holds your personal information on our behalf.

Relevant laws

We are subject to a variety of laws, including the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) and Corporation Act 2001 (Cth) and regulations made under those Acts, which may require us to collect, hold and use information to personally identify you.

Unsolicited information

If we receive personal information about you that we have not requested, and if we determine that we could not have lawfully collected that information under privacy law if we had requested it, we will destroy or de-identify the information, if it is lawful and reasonable to do so.

Disclosure

In general, we do not use or disclose your personal information for a purpose other than:

- a purpose set out in this Privacy Policy;
- a purpose you would reasonably expect;
- a purpose required or permitted by law; or
- a purpose otherwise disclosed to you to which you have consented.

ACCESS

You may request access to your personal information by emailing investments@tpam.capital We will deal with your request for such access within a reasonable time.

If we refuse access, we will provide you with a written notice which sets out the reasons for the refusal and the relevant provisions of the Privacy Laws that we rely on to refuse access.

We may recover reasonable costs in relation to a request for access to personal information.

Accuracy

We take reasonable steps to ensure that the personal information we collect is accurate, up-to-date, complete and relevant.

Where we believe that the personal information we hold is inaccurate, out-of-date, incomplete, and/or irrelevant or misleading, we will take reasonable steps to correct that information.

You may also request that we correct your personal information that we hold by contacting us via emailing investments@tpam.capital

Security

We and/or our Administrator holds your personal information in paper-based and electronic files. We require the Administrator to take all reasonable steps to ensure that your personal information which is kept in our files is protected from:

- misuse, interference and loss; and
- unauthorised access, modification or disclosure.

This means that, in respect of our paper-based files, the Administrator maintains various security systems on its premises, and in respect of its electronic files, it maintains secure electronic network systems.

When we no longer require your personal information (including when we are no longer required by law to keep records relating to you), we ensure that it is destroyed or de-identified.

Website

This section explains how we handle personal information collected from our website. If you have any questions or concerns about transmitting your personal information via the internet, you may contact us using the contact details provided above, as there are other ways for you to provide us with your personal information.

Visiting our website

Anytime you access an unsecured part of our website, that is, a public page that does not require you to log on, we may collect information about your visit, such as:

- the time and date of the visit;
- any information or documentation that you download;
- your browser type; and
- your server address.

Email

When we receive emails, we will retain the email's content and any response to you where we consider it necessary to do so. Your email address will only be used or disclosed for the purpose for which it was provided. It will not be added to any mailing lists or used for any other purpose without your consent.

Security

We make reasonable efforts to ensure that the most up-to-date security measures are used on our website to protect your personal information. Any data containing personal information which we transmit via the internet is encrypted. However, we cannot absolutely guarantee that any information transmitted via the internet by us, or yourself, is entirely secure. Please note that you use our website at your own risk.

Links on our website

Our website may contain links to third party websites and we must state that the terms of this Privacy Policy do not apply to external websites. If you wish to find out how any third parties handle your personal information, you will need to obtain a copy of their privacy policy.

Marketing

We or our related entities may use your personal information, including your contact details, to provide you with information about products and services, including those of third parties, which we consider may be of interest to you. We may also provide your details to other organisations for specific marketing purposes while you are a unit holder in our managed funds even if you are on a Do not Call Register.

You may opt out at any time if you no longer wish to receive marketing information. In order to do so, you will need to request that we no longer send marketing materials to you or disclose your information to other organisations for marketing purposes. You can make this request by using the contact details provided above, or by "unsubscribe" from email marketing messages.

Questions and complaints

If you have any questions, concerns or complaints about this Privacy Policy, or our use of your personal information you may contact us with any queries about privacy via the following means:

Tacking Point Asset Management

Email: investments@tpam.capital

Business address: Angel Place, Level 31, 123 Pitt Street, Sydney NSW 2000

Telephone number: 1300 241 537 in Australia

You may also lodge a complaint with the Office of the Australian Information Commissioner by

Telephone: 1300 363 992 or

Email: enquiries@oaic.gov.au.

Once a complaint has been lodged, the Privacy Officer will respond to you as soon as possible.

Changes to the privacy policy

Tacking Point may make changes to this Privacy Policy from time to time, without notice to you. An up-to-date copy of our Privacy Policy is available on our website.