

Privacy Policy

July 2015

How do we use the personal information investors provide?

Bennelong Funds Management Limited (BFML, we, us) is committed to maintaining the privacy of any personal information about our investors (investor, you, your) that we collect in accordance with the Privacy Act 1988 (Cth), its amendments and the 13 Australian Privacy Principles (APPs). We will take all reasonable steps to protect your personal information from misuse, interference, loss, unauthorised access, modification or disclosure using both physical and electronic security measures.

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.

Investors' personal information is gathered using an Application Form attached to a current Information Memorandum or Product Disclosure Statement available on this BFML website. The Information Memorandum for BLSEM is available by contacting [Client Services](#) or by calling 1800 895 388. This information is required in order that BFML (as the Responsible Entity) can provide the investment to the investor. We usually only collect information about investors directly from investors.

BFML may also use this information in order to administer, manage and generally service the investor's investment including any requirement to comply with Australian taxation laws, the Corporations Act and other laws and regulations.

Who do we provide investor information to?

For the collection of investors' personal information, BFML outsources this function to third parties we appoint as administrators who are located 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 to 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 your personal information for a permitted purpose:

- inside the Bangarra Group (formerly known as Bennelong Group) of companies
- to third parties we appoint as custodians located in Australia
- to an investor's agent
- to government authorities when required by law

If the investor notifies us that they have a financial adviser, either on the Application Form or in writing (at a later date), the investor also acknowledges that details of their investment will be provided to their financial adviser.

What personal information do we collect and hold?

BFML, through the use of our administrators, may collect and hold your personal information for the purposes of enabling you to invest in a BFML managed fund. The kinds of personal information that we may collect and hold include your name, date of birth, home address, phone number, bank account details and Tax File Number (TFN). 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.

What if the investor does not provide the personal information requested?

Where you do not provide us with all or some of your personal information contained in our Application Forms, you may not be able to invest in a BFML managed fund.

It is not compulsory to provide a TFN or Australian Business Number (ABN). If you are making an investment in a BFML managed fund in the course of a business or enterprise by you, you may quote an ABN instead of a TFN. Without an investor's TFN, or exemption information, withholding tax will be deducted from distributions at the highest marginal rate (plus Medicare Levy).

Joint applicants will be assumed to be joint tenants unless otherwise specified.

The investor must provide us with their current bank account details as redemption and distribution (if applicable) payments are required to be paid into this bank account. The account must be held in the same name as the investment account holder. The bank account must be domiciled in Australia and denominated in Australian dollars.

We are required to send investors various communications about their investment. This includes monthly unitholder statements, application and redemption confirmations, and half-yearly and annual statements. Therefore, it is a requirement for the investor to nominate their preferred method for receiving these communications. In receiving or remaining silent in confirming receipt, an investor is not bound or consenting to any further materials or obligations and may unsubscribe to such further materials at any time.

To comply with our obligations under AML/CTF Laws, we must collect certain information, supported by original or certified copies of relevant documents, about each investor. Documents written in a language other than English must be accompanied by an English translation prepared by an accredited translator.

We may hold your personal information in either physical and or electronic storage facilities.

Contacting Bennelong Funds Management

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. An investor 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. The investor can request access to or changes to their 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 of the [name of Fund]

Level 1, 9 Queen Street Melbourne VIC 3000

Phone: 1800 895 388

Fax: (03) 8611 6534

Email: privacy.officer@bennelongfunds.com

Details of Responsible Entity

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