
Section 1 Responsible persons and contact points

If you have any questions about this Policy or your privacy (including any access, correction, complaint or marketing opt-out requests, or for further details of the entities to which this Policy applies) you can contact us via the following contact details:

- Email: info@madigancapital.com
- Phone: (02) 8277 6019
- or by writing to our Privacy Officer at:

Madigan Capital Pty Ltd
Level 54
Governor Phillip Tower
1 Farrer Place
Sydney NSW 2000

For information about privacy generally, or if your concerns are not resolved to your satisfaction, you may contact the Office of the Australian Information Commissioner at www.oaic.gov.au and on 1300 363 992.

This Policy is subject to change at any time. Please check the Privacy Policy link on our website/s regularly for any changes.

Section 2 What types of Personal Information do we collect?

In the course of providing financial services and performing our other functions we may collect:

- i. *Personal information* including:
 - a. names;
 - b. mailing and/or street addresses;
 - c. email address;
 - d. telephone number;
 - e. facsimile number;
 - f. age or date of birth;
 - g. government identifiers (such as your tax file number);
 - h. nationality;
 - i. country of birth;
 - j. family court orders;
 - k. various financial information;
 - l. interests, preferences and opinions; and
 - m. information about your use of our products and services and your other dealings with us, including any contact we have with you by telephone, email or online.

- ii. *Sensitive information* including:
 - a. professional memberships; and
 - b. criminal records.

Note: the terms *personal information* and *sensitive information* used in this policy have the meaning as set out in the Privacy Act. Some of the personal information we collect is collected under other laws such as the AML/CTF laws, under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006.

We are subject to stricter requirements where we collect sensitive information about you. For example, we can collect this information where you consent, or if the collection is necessary to lessen or prevent a serious threat to life, health or safety or we otherwise collect the information in accordance with applicable privacy laws.

We may also collect some information that is not personal information because it does not identify you or anyone else. For example, we may collect anonymous answers to surveys or aggregated information about how users operate our website/s.

Section 3 How do we collect and hold your Personal Information?

How we collect personal information will largely depend upon whose information we are collecting. If it is reasonable and practical to do so, we collect personal information directly from you, for example:

- i. through your access and use of our website/s;
- ii. during conversations between you and our representatives; or
- iii. when you make an enquiry or complete an application.

We may also collect personal information from your organisation and representatives, our related companies, public sources and third parties such as our fund administrator or independent sources.

Sometimes we may be provided with your personal information without having sought it through our normal means of collection. We refer to this as *unsolicited information*. Where we collect unsolicited information, we can generally only hold, use and or disclose that information if we could otherwise do so had we collected it by normal means. If that unsolicited information could not have been collected by normal means then we may be required to destroy, permanently delete or de-identify the information as appropriate.

Section 4 Cookies

In some cases, we may also collect your personal information through the use of cookies. When you access our websites, we may place a cookie (which is a small summary file containing a unique identification number) on your computer. This enables us to recognise you when you return and greet you each time you visit our websites with any relevant preferences. It also enables us to keep track of services you view or preferences you have so that, if you consent, we can send you news about those services.

We may also use cookies to measure traffic patterns, to determine which areas of our websites have been visited and to measure transaction patterns in aggregate. This information is used to research user habits and enables us to improve our online services. Our cookies do not collect personal information. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them.

We may log the electronic address of your computer, otherwise known as an IP address, to analyse trends, administer websites, track user movements and gather broad demographic information.

Our websites may use Google services such as Google Analytics from time to time. For more about how Google collects and processes data, and your privacy choices with Google, please see Google's privacy policy and their information at www.google.com/policies/privacy/partners/.

Section 5 What happens if we cannot collect your Personal Information?

If you do not provide us with the personal information described above, some or all of the following may happen:

- i. we may not be able to provide the requested services to you, either to the same standard or at all;
 - ii. we may not be able to provide you with information about our products and services that you may want; or
 - iii. we may be unable to tailor the content of our websites to your preferences and your experience of our websites may not be as enjoyable or useful.
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Section 6 How we use your Personal Information

Our uses of personal information include but are not limited to:

- i. Providing you with one or more of our financial services or products;
- ii. Improving and tailoring our services and products;
- iii. Assessing your application for a financial product or service;
- iv. Conducting product and market research;
- v. Understanding your needs, interests and behaviour;
- vi. Verifying your identity and personal information;
- vii. Maintaining and updating our records;
- viii. Training and managing our people;
- ix. Communicating with you about the products and services that we offer across the Group (subject to legal requirements and your right to opt out) and conducting other marketing activities;
- x. Co-operating with regulators and authorities and complying with our legal obligations (e.g. under anti-money laundering laws);
- xi. Dealing with suspected fraud, misconduct and breaches of legal obligations; and
- xii. Facilitating the sale of any interest in our business.

It may be necessary for us to disclose your personal information to certain third parties (some of whom may be located overseas), e.g. in order to assist us with one or more of our functions or activities. This may include our related companies, your representatives, government agencies, bodies or authorities (including regulatory bodies) and organisations providing services to us, such as unit registry, fund administration, custodial, audit, investment management, legal, customer contact, data processing, data analysis, information broking, research, investigation, insurance, website or technology services. It is not practicable to list every country in which such recipients are located but it is likely that such countries will include the USA, Canada, the United Kingdom, the Middle East and members of the European Union from time to time.

Section 7 Storage and Security of your Personal Information

We may hold your information in either electronic or hard copy form.

We take a range of steps to protect the personal information we hold about you from misuse, loss, unauthorised access, modification or disclosure.

Depending on the circumstances, these steps may include:

- i. Restricting access to information on our databases on a need to know basis with different levels of security being allocated to staff based on their roles and responsibilities and security profile.
- ii. Ensuring all staff are aware that they must not reveal or share personal passwords.
- iii. Ensuring where sensitive information is stored in hard copy files that these files are stored in a secure location with access restricted to staff on a need to know basis.
- iv. Implementing physical security measures at our premises to prevent break-ins.
- v. Implementing security systems, policies and procedures to protect personal information stored on our computer networks.
- vi. Implementing human resources policies and procedures, such as email usage, confidentiality and document security policies, designed to ensure that staff follow correct protocols when handling personal information.
- vii. Undertaking due diligence with respect to third party service providers who may have access to personal information, including customer identification providers and cloud service providers, to ensure they are able to provide appropriate protection to your information.

Where any personal information is no longer needed by us, or required to be retained by any other laws, we are required to take reasonable steps to destroy it in a secure manner, or delete or de-identify it as appropriate.

Section 8 Links

Our website may contain links to other third-party websites. We do not share your personal information with those websites and we are not responsible for their privacy practices.

Third party websites are responsible for informing you about their own privacy practices. Please check their privacy policies.

Section 9 How we ensure the quality of your Personal Information

Privacy laws require us to take reasonable steps to ensure the personal information we collect, use and disclose is accurate, complete and up-to-date.

You can help us with this by contacting us if any of the details you have provided change or if you believe that the information we have about you is not accurate, complete or up-to-date.

Section 10 Gaining access to your Personal Information

You may request access to the personal information we hold about you, or request that we change the personal information, by contacting us.

If we do not agree to provide you with access or to amend your personal information as requested you will be notified accordingly. Where appropriate we will provide you with the reason/s for our decision. If the rejection relates to a request to change your personal information you may make a statement about the requested change and we will attach this to your record.

Section 11 Privacy Complaints

If you wish to make a complaint regarding the treatment of your privacy or a possible breach by us of the Australian Privacy Principles, you may do so by contacting us as set out in Section 1.

We will respond, usually within 21 days after receipt of a complaint. We may seek further information from you in order to provide a full and complete response.