

Background

The objectives of our privacy policy are to ensure that we handle personal information we have about you consistently with the Australian Privacy Principles. This section of the website has a summary of our policy. A copy of our full policy is available on request.

Equity Trustees Limited ABN 46 004 031 298 AFSL 240 975 (**Equity Trustees**) is (or soon will be) the responsible entity for our funds. It too seeks to handle personal information it has about you consistently with the Australian Privacy Principles. Information about this is in the product disclosure statement for each fund and on its website. Alpha Vista Investment Managers Pty Limited and key members of our investment team are authorised representatives of Sanlam Private Wealth Pty Ltd ABN 18136 960775 AFSL 327 927 (**Sanlam**).

What is privacy?

The word 'privacy' means different things to different people. The type of privacy covered by Australia's Privacy Act and its privacy regulator, the Office of the Australian Information Commissioner (**OAIC**), is the protection of people's personal information.

Our policy is directed towards the protection of people's personal information. Personal information is information that identifies you or could identify a person. The protection of your personal information privacy is different to other related concepts such as confidentiality, secrecy or freedom of information. If you are in doubt, contact us or the OAIC.

Generally

The Australian Privacy Principles (**APPs**) are the base line privacy standards which many private sector organisations need to comply with in relation to personal information they hold. There are 13 APP that regulate how private sector organisations manage personal information. They cover the collection, use and disclosure, and secure management of personal information. They also allow individuals to access that information and have it corrected if it is wrong. A copy of the Australian Privacy Principles is available at <https://www.oaic.gov.au/privacy-law/privacy-act/australian-privacy-principles>.

There is also a summary of the APPs below.

Why we collect

Broadly, the primary purpose we collect, hold, use and disclose personal information for purposes related to the direct and indirect promotion of the Fund and assisting in its operation, but also for related and/or secondary purposes, for example to:

- make the use of our website easier
- contact you regarding services from us or our affiliates
you can opt out of communications by contacting us or them,
- comply with legal obligations such as where an investor is located, how old they are and anti money laundering laws,
- monitoring, evaluating and improving products and services,
- research.

If you do not provide us with contact details and other information we ask for, we (or others) may not be able to provide services to you.

How we collect

There are several ways we collect or obtain personal and other information, but we aim to ensure they are lawful and fair, and these are usually because someone has:

- registered their interest in the Fund, with us or an affiliate, or
- applied to become, or are an investor in, the Fund, and the information has been shared with us
for example by or for Equity Trustees or its administrator or Sanlam.

People who assist you such as your financial adviser or the trustee of a fund you use to invest may pass it onto us.

What we collect

Personal information collected can include the following:

- name, gender and date of birth,
- contact details,
- account details,
- TFNs and ABNs,
- details of your investors and beneficiaries,
- details of the source and use of money you invest,
- information contemplated by laws and regulator, settlement system or exchange policies and requests, and
- any other information that we consider necessary or desirable.

Disclosure of personal information

We will seek to ensure that your personal information is not used or disclosed for any purpose other than:

- the primary purpose for which it was collected
or a purpose that is related to the primary purpose for which it was collected or a related secondary purpose,
- where you have consented to the use or disclosure, or
- in other circumstances where the Australian Privacy Principles authorise the use or disclosure such as when it is required by or authorised under law.

We will not disclose personal information we hold about you unless:

- our policy allows,
- you otherwise agree,
- we consider someone needs the information
typically because they are a regulator such as the tax office, a settlement system or exchange or are your adviser, or to assist us or an affiliate, for example the administrator of the Fund, or
- laws or regulator, settlement system or exchange policy requires or requests.

Those we disclose personal information to include:

- Equity Trustees and those that assist it
for example the Fund administrator
- our affiliates and those that assist them,
- regulators, settlement system or exchanges
such as the ATO, AUSTRAC, the ASIC, the OAIC, APRA and ASX,
- your financial or other adviser,
- those we have no reason to doubt are acting on your behalf,
- companies with our group and associated with us, and
- those who help us provide products and services to you
for example, distributors, promotions companies, insurance brokers, insurance companies, custodians, fund administrators, mailing houses, lawyers and auditors.

What about security?

We are committed to ensuring that personal information is kept secure. We take reasonable steps to ensure that the personal information that we hold is protected from misuse and loss and from unauthorised access, modification and disclosure. We have a number of physical access and technology policies and procedures in place designed to provide a robust security environment. No personal data is stored on our web site.

The internet is not a secure environment and we cannot guarantee the security of information we store or exchange electronically. This is the nature of the Internet.

Although we take steps we consider reasonable to protect your information, we cannot guarantee its security nor that anything we send to you is virus free.

It is possible however that your personal information will be moved by those who help us provide products and services to you to a place where Australian laws do not apply, and different standards may apply there.

Records may be stored in the cloud, in Australia or overseas (as is the nature of storage such as this), by us as well as those who help us provide products and services to you. We will tell you what cloud providers are used if you ask, and direct you to their information policies on personal information.

It is not practicable to tell you the countries where that information is likely to be located.

We may use “cookies” to obtain information with regards to web site activity (such as the type of browser used, the number of pages viewed, time of the site and navigation patterns), and to help you use this site when you visit again. This information on its own does not identify an individual but it does provide us with statistics that can help us with design of the web site. You can configure your browser to accept or reject cookies. If you reject cookies you may not be able to use some or all of our web site.

We may also arrange for advertising through our site. If you use an ad blocker, we may restrict your use of the site.

Access to personal information

In most circumstances, you have the right to access any personal information we collect and hold about you, and to have it corrected if it is wrong.

This is subject to exceptions allowed by law such as where giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety or where providing you with access would have an unreasonable impact upon the privacy of others.

If we deny your request or access we will provide you with the reasons for this decision.

To request access please contact us and we will respond within a reasonable period after the request is made.

Correcting personal information

We endeavour to take reasonable steps to ensure that the personal information that we collect, use or disclose is accurate, up to date, complete, relevant and not misleading.

If you believe that any of the personal information that we hold about you is not accurate, complete, up-to-date or is misleading please contact us.

If we agree that the personal information requires correcting we will take reasonable steps to do so.

If we do not correct your personal information we will provide you with the reasons for not doing so. If you request that we associate with the information a statement claiming that the information is not accurate, complete and up-to-date we will take reasonable steps to comply with this request.

What else?

We may take and may act (or not act as relevant) on any advice, information and documents which we have no reason to doubt as to authenticity, accuracy or genuineness.

We may make changes to information handling and privacy policies and practices and this Privacy Policy Statement. We will publish important changes on our web site and if necessary update this Privacy Policy.

Questions and complaints

You can obtain further information about the way in which we manage personal information that we hold, or you can raise any privacy issues with us (including any concerns you may have about breaches of the Australian Privacy Principles), by contacting us in writing. Details are on the [Contacts](#) page of this website.