



ARENA INVESTMENT MANAGEMENT LIMITED

ACN 077 235 879

PRIVACY POLICY

March 2014

1. About this policy

We recognise that your privacy is important to you. This policy has been prepared by Arena Investment Management Limited to provide you with information on the collection, storage, use and disclosure of your personal information by Arena Investment Management Limited and its related entities (*Arena*). When referring to personal information, we mean information that identifies an individual or from which an individual's identity can reasonably be ascertained.

Arena abides by the *Privacy Act 1998 (Cth)* and the Australian Privacy Principles (APPs). A summary of the APPs is available by contacting our office. Our contact details are provided at the end of this document.

2. About us

Arena Investment Management Limited is a responsible entity and manager of various managed investment schemes and joint ventures (**Funds**) and holds Australian Financial Services Licence No. 233190.

3. Kinds of personal information collected and held

In the course of providing investment management services we may collect:

- a) personal information such as your name, date of birth, telephone numbers, email address, bank account details and investment information;
- b) sensitive information such as your tax file number or membership of a professional association; and
- c) other information that may be required under Australian anti-money laundering legislation for identification and other purposes, including sensitive information such as your country of origin.

In some circumstances, we may also hold other personal information you provide to us.

4. How we collect personal information

Generally, we collect your personal information directly from you. For example, we may request that you provide your personal information when you fill out an application form for one of our Funds or submit information to us via our website or using one of our standardised forms. We also receive personal information by direct communication including email, letters, over the telephone and through financial transactions. There may be other occasions when we collect your personal information from you or from other sources, such as from your authorised financial adviser, our related bodies corporate, a publicly maintained record or from an information services provider. We will only do so where it is not reasonable and practical to collect the information directly from you.

5. How we hold personal information

We hold personal information in a number of different formats including in electronic databases, hard copy and electronic versions of forms that you submit to us. Personal information that we store is made available to staff who need access to it on personal devices such as computers and smartphones.

We will take all reasonable steps to ensure that the personal information we hold is protected from misuse, interference and loss, unauthorised access, modification or disclosure, including:

- d) restricting access to personal information to those staff, related entities and service providers who need access to the personal information to perform their role;
- e) implementing security systems designed to protect personal information stored on our computer network;
- f) implementing physical security measures within our offices and at our premises;
- g) training our staff on this policy and the APPs; and
- h) where appropriate, requiring that our service providers and other third parties to whom we disclose personal information comply with the APPs.

We will take reasonable steps to destroy personal information or ensure it is de-identified when we no longer need it for any purpose for which it may be used or disclosed under the APPs.

6. How we use and disclose personal information

We usually collect, hold, use and disclose your personal information for the following reasons:

- a) providing you with access to our website including restricted pages containing your personal investment information;
- b) facilitating our internal business operations;
- c) administering and processing any applications, withdrawals or other requests that you submit to us;
- d) communicating with you in relation to your investments in our Funds;
- e) marketing and promotional activities including providing you with information about our products or services that may be of interest to you;
- f) advising the Australian Taxation Office and other governmental authorities of your tax file number;
- g) to enter your details on the register of the members of a Fund;
- h) to make deposits of distributions to your nominated bank account;
- i) for accounting, billing and other internal administrative purposes;
- j) to comply with our legal requirements under any applicable laws, including the anti-money laundering legislation and our obligation to make registers of members

of our Funds (including your name, address and holding in the Fund) available for inspection or provide a copy in certain circumstances;

- k) where disclosure is reasonably necessary for a law enforcement related activity;
- l) for the purposes for which it was provided for or for a related secondary purpose (or, in the case of sensitive information, a directly related secondary purpose) where you would reasonably expect us to use or disclose the information;
- m) where another permitted general situation applies or another permitted health situation exists; or
- n) where you have given your consent.

We will not use or disclose personal information collected by us for any purpose other than those listed above.

7. Who we disclose personal information to

The types of organisations to which we may disclose the personal information you provide us with include:

- a) your financial advisers or other professional advisers;
- b) third party service providers which we may engage to provide registry, compliance, custody, administration, technology, auditing, mailing, printing, due diligence or other services;
- c) Government authorities such as the Australian Securities and Investments Commission (**ASIC**) where required to by law or where reasonably requested;
- d) our professional advisers (including legal and accounting firms, auditors, consultants and other advisers);
- e) any person who makes a valid request to inspect or obtain a copy of a register of members of a Fund that is registered with ASIC, of which you are a member and
- f) our related bodies corporate or any other company within the Arena group.

Arena has appointed Boardroom Pty Ltd (Boardroom) to provide registry, investor communications and related services for Arena's Funds. Boardroom is one of Australia's leading providers of registry and related services for listed and unlisted investment funds. When you provide personal information to Arena in relation to a current or proposed investment in an Arena Fund that information will be disclosed to Boardroom to enable Arena to provide its services to you. Arena requires Boardroom to comply with this policy and the APPs.

8. Overseas disclosures

Arena does not currently disclose personal information to overseas recipients and has no plans to do so.

9. Accessing and seeking correction of your personal information

You may request access to your personal information at any time and we will notify you of whether we agree to provide you with access. If access is provided we will require you to provide evidence of your identity prior to providing access in accordance with this policy. We will provide access to personal information by either providing you with copies of the information requested or allowing you to inspect the information.

We will not provide you with access to personal information which would reveal any confidential formulae or the detail of any in-house evaluative decision making process, but may instead provide you with the result of the formulae or process or an explanation of that result.

The APPs place other restrictions on accessing your personal information. Restrictions include:

- a) where the provision of access would have an unreasonable impact on the privacy, or would pose a serious and imminent threat to the health or safety of any individual;
- b) the request for access is frivolous or vexatious; or
- c) the provision of access is unlawful or would be likely to prejudice a criminal investigation.

If we decline your request for access, we will provide you with an explanation for that refusal.

We seek to ensure that personal information that we hold is accurate, complete and up to date by confirming your identity by reference to our records when you contact us. We also have various forms available on our website with which you can update your personal information at any time. Generally we will require changes to personal information to be advised in writing.

10. How you can make a privacy complaint

If at any time you have any complaints in relation to privacy, please contact our Privacy Officer in writing using the contact points referred to below. We will try to acknowledge your complaint immediately and respond within a reasonable period (usually no longer than 30 days), however if you are unhappy with our response, you are entitled to contact the Office of the Australian Information Commissioner who may investigate your complaint further.

Additional information about privacy in Australia may be obtained by visiting the web site of the Office of the Australian Information Commissioner at www.oaic.gov.au.

Arena will seek to handle privacy complaints in a manner consistent with its internal dispute resolution procedure for financial services, however the external resolution process for financial service (through the Financial Ombudsman Service) is separate from privacy complaints which are dealt with by the Office of the Australian Information Commissioner.

11. Changes to our privacy and information handling practices

This policy was adopted on 12 March 2014 and is subject to change at any time and changes will be published on our website. Please check our website regularly for any changes.

12. Contact details

Any questions or complaints may be directed to the Privacy Officer by telephone on (03) 9093 9000, fax on (03) 9093 9093, post to Locked Bag 32002, Collins Street East, Victoria 8003 or email to privacy@arenainvest.com.au.

You may deal with the us by not identifying yourself or by using a pseudonym, however we may not be able to provide you with the information that you seek without verifying your identity.

www.arenainvest.com.au

Contact

Arena Investment Management Limited
ACN 077 235 879
AFSL No. 233190
Level 5, 41 Exhibition Street
Melbourne Victoria 3000

Any questions may be directed to:
Free call: 1800 008 494
Fax: 03 9093 9093

Postal address:
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Collins Street East
Victoria 8003

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