



Privacy Policy

This policy sets out how and why Tribeca Private Pty Ltd (ABN 91 650 304 608) ("Tribeca", "we" or "us") will collect, use, store, disclose and otherwise manage and protect your personal information.

Personal information is defined under the Privacy Act 1988 as "information or opinion, whether true or not, and whether recorded in material form or not, about an identified individual, or an individual who is reasonably identifiable."

We take privacy seriously and are committed to ensuring the protection of your personal information.

What personal information do we collect?

We collect personal information about you when you contact us, use our products or services, visit our websites or deal with us in some other way. The personal information we collect from you may include information about your identity (e.g. your name, address, date of birth, gender, marital status), your tax file number and tax residency status, and financial and transaction information.

If you provide us with personal information that we have not requested (unsolicited personal information) we will, unless otherwise required or permitted by law, delete or destroy it as soon as possible after receiving it.

For certain investors, Tribeca may also need to collect and disclose certain personal information to the Australian Tax Office in order to comply with the Foreign Account Tax Compliance Act (FATCA).

You do not have to provide us with your personal information but if you do not provide us with the personal information that we need, we may not be able to provide our services or assistance to you or our clients on your behalf and may

not be able to process any application by you for investment in our investment products.

How do we collect personal information about you?

We may collect your personal information through our direct dealings with you, e.g. via telephone or email correspondences, or when you submit an online form.

We may also collect information about you from third parties, such as services providers (fund Administrators or registrar), agents, brokers, advisors, companies or bodies that you own shares or have an interest in, family members, and / or anyone you have authorized to deal with us on your behalf.

Tribeca will only collect sensitive personal information with an individual's consent or where required by law of the establishment, exercise of defence of a claim. Sensitive information is personal information about an individual's race or ethnic origin, political opinions/associations, religious beliefs, trade/professional associations, sexual preferences, criminal record or health.

How do we use personal information you provided us?

We collect, use and exchange your information so that we can:

- Confirm your identity;
- Access your applications for an investment product;
- Manage our relationships with you;
- Minimize risks and identify or investigate fraud and other illegal activities;
- Provide you with the services requested (e.g. tax / financial reporting for individual investors);
- Communicating with you on matters of importance related to your investments;
- Provide quality assurance and training to our staff;
- Any other uses identified at the time of collecting your personal information. Tribeca may also collect, use and disclose your personal information to inform you of products, services or offers of Tribeca or its related Group companies which may be of interest to you. Where you are an investor in a fund managed by Tribeca, this may include providing you with direct marketing information regarding other funds of Tribeca or its related Group companies. If you do not wish to receive such material, you can opt out at any time.

Who do we share your personal information with?

We may share your personal information with other members of the Tribeca Group. We may also share your personal information with third parties that generally include

- Third party service providers for the purposes of enabling them to provide a service such as financial reporting, investor reporting / communication, share registry, secure storage and archiving services or managing a product;
- Anyone you authorized to deal with us on your behalf (e.g. financial planner, legal advisor, etc) to manage your affairs;
- The Australian Taxation Office for the purposes of compliance with reporting obligations under legislation / regulations;
- The Australian Securities and Investments Commission and the Australian Stock Exchange, for the purposes of legislative and regulatory compliance;
- Government agencies / regulators / law enforcement agencies and any other parties where authorized or required by law;
- Other entities if you have given your express consent; and
- Any other entities identified at the time of collecting your personal information or to which we are legally required to disclose your personal information.

How do we store and protect your personal information?

Your personal information is stored in secure buildings and systems in written and/or electronic form. Tribeca uses reasonable measures and steps to ensure that personal information is protected from misuse and loss and from unauthorized access or modification or disclosure. Such measures include:

- Use of physical security, password protection and other measures;
- Regular staff training on how to keep business data and your personal information safe and secure;
- Confidentiality agreements in place to bind third party service providers (e.g. unit registry, fund administrators, mailing houses, etc) who may be provided with your personal information in order to provide designated services in accordance with Privacy Act;
- Destroying or de-identifying personal information in a secure manner when it is no longer required.

Accessing your personal information held by Tribeca

You have a right to request access to your personal information we hold. If you wish to change any personal information we hold about you, the request must be in writing and must satisfy our internal procedures that the individual making the request is the same person as the subject of the request. These changes may include change of address or bank account details.

How can you make a complaint under this Policy?

If you believe that Tribeca has breached its privacy obligations, please contact Tribeca's Compliance Manager at corporate@tribecaip.com.au in the first instance. If the complaint cannot be resolved, the matter may be referred to the Australian Privacy Commissioner via their website www.oaic.gov.au

Tribeca's Privacy Policy is subject to change from time to time as we consider necessary. Please contact us on +61 (2) 9640 2600 if you would like a copy.