

AUSTRALIAN FIDUCIARIES LIMITED

Privacy Policy



ISSUED BY

Australian Fiduciaries Limited
ACN 601 228 844 AFS Licence No. 465658
Rushton Global Market Neutral Fund
ARSN 603 285 801



INVESTMENT MANAGER

Rushton Financial Services Pty Ltd
ACN 601 242 102
AFS Authorised Representative No. 470826

DATED: 30 JANUARY 2015

Australian Fiduciaries Limited - Privacy Policy

This is the Privacy Policy for Australian Fiduciaries Limited ACN 601 228 844 (we, us or our), an Australian financial services licensee (number 465658) and operator of managed investment schemes. It applies to us in our capacity as trustee or responsible entity for any trusts or managed investment schemes operated by us, as well as in our personal capacity.

Your Privacy

We respect your privacy and we are committed to managing your personal information responsibly and in accordance with our legal obligations under the Privacy Act 1988 (Privacy Act). The Privacy Act regulates the way we collect, use, disclose, keep secure, and give you access to, your personal information.

This Privacy Policy sets out the type of information we collect and how we collect, store, use and disclose your personal information.

You are not required to provide us with your personal information, but if you do not do so we may not be able to provide you with our products or services.

If you apply for or accept any of our products or services or otherwise provide us with your personal information, then you agree to your information being collected, held, used and disclosed as set out in this Privacy Policy.

Changes to our Privacy Policy

We may update and revise this Privacy Policy from time to time. The current version of our Privacy Policy can be accessed free of charge on our website, www.australianfiduciaries.com.au, or by contacting us on the details below. This version of our Privacy Policy was last updated in December 2014.

What kind of personal information do we collect and hold?

We will only collect personal information from you which is necessary for us to provide our financial products and services and to comply with our legal and regulatory obligations. Subject to your written consent, we may collect personal information electronically. In order to provide our products and services, we may collect the following information:

- (a) Your full name, date of birth and contact details (including your residential address, e-mail address, and fax and telephone number).
- (b) Information and documentation to verify your identity, such as a copy of your drivers licence or passport, to ensure compliance with the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (AML/CTF Act) and/or other legislation and regulations regarding identification verification, and tax reporting and withholding.
- (c) Your tax file number (as authorised under the tax laws and Privacy Act) and bank account details for the purpose of administering investor accounts and tax reporting and withholding.
- (d) Investor contribution details and investment choice.
- (e) Copies of any relevant trust deeds, partnership agreements or constitutions, which may be relevant to comply with the AML/CTF Act.

It may, on occasion also be necessary for us to obtain other details, including information relating to powers of attorney or for probate and estate administration.

How do we collect and hold your personal information?

Unless it is unreasonable or impractical for us to do so, we will collect your personal information from you directly, including:

- (a) from you filling out application forms, such as an application form completed by you to acquire a financial product or receive other financial services from us;
- (b) through your use of our website;
- (c) from communications between you and our officers, employees and representatives (including communications conducted in person, over the phone, by email or otherwise), and

- (d) from promotional and marketing activities undertaken by us, in which we request or otherwise receive personal information from you (such as from competitions organised by us).

However, we may also collect information about you from third parties, such as:

- (a) your financial or other professional advisor or broker;
- (b) your authorised representatives, such as executors or administrators, and
- (c) subject to your consent, identification verification service providers that we may engage to collect and verify personal information electronically.

Use of our website

We may use "cookies" to help us tailor our website to better suit your needs and improve our service. Cookies are small text files that are stored in your computer's memory and hard drive when you visit certain web pages. Cookies are used to enable websites to function or to provide information to the owners of a website.

We use cookies on this website for the following purposes:

- (a) Analytical purposes: Analytical cookies allow us to recognise, measure and track visitors to the website. This helps us to improve and develop the way the website works, for example, by determining whether site visitors can find information easily, or by identifying the aspects of the site that are of the most interest to them.
- (b) Usage preferences: Some of the cookies on the website are activated when visitors to our sites make a choice about their usage of the site. Our website then 'remembers' the settings preferences of the user concerned. This allows us to tailor aspects of the site to the individual user.
- (c) Terms and conditions: We use cookies on the website to record when a site visitor has seen a policy, such as this one, or provided consent, such as consent to the terms and conditions on our website. This helps to improve the user's experience of the site - for example, it avoids a user from repeatedly being asked to consent to the same terms.
- (d) Session management: The software that runs the website uses cookies for technical purposes needed by the internal workings of our servers. For instance, we use cookies to distribute requests among multiple servers, authenticate users and determine what features of the site they can access, verify the origin of requests, keep track of information about a user's session and determine which options or pages to display in order for the site to function.
- (e) Functional purposes: Functional purpose cookies store information that is needed by our applications to process and operate. For example, where transactions or requests within an application involve multiple workflow stages, cookies are used to store the information from each stage temporarily, in order to facilitate completion of the overall transaction or request.

Storage and security

All personal information we collect will be held securely and in accordance with this Privacy Policy. We will protect your personal information and prevent unauthorised access through the use of secure passwords, user logins, or other security procedures, including firewalls and anti-virus technology.

However, we cannot provide any assurance regarding the security of information transmitted to us online, as the internet is inherently insecure. Nor can we guarantee the supply of information to us from you will not be intercepted. Information you transmit to us online is at your own risk.

Purposes for which we collect, hold, use and disclose personal information

We will only use and disclose your personal information for the purpose of providing our financial products and services to you. We may use and disclose your personal information to:

- (a) assess your application and establish and administer your investment;
- (b) communicate with you (or your advisor) in relation to your investment;
- (c) comply with our legal, regulatory and other obligations, including our reporting and recording keeping obligations;
- (d) improve the quality of our services and for training purposes;
- (e) assist with the administrative, marketing (including direct marketing), planning, product or service development, quality control or research purposes of us and our contractors and service providers, and
- (f) handle any enquiries or complaints relevant to our financial products or services or your investment.

We may disclose your personal information to others if we are required to, such as where we are required to by:

- (a) Australian Government regulators and entities such as the Australian Securities and Investments Commission, the Australian Tax Office, and the Australian Transaction Reports and Analysis Centre
- (b) the Financial Ombudsman Service (FOS);
- (c) court order (including in Family Law matters), or
- (d) other regulatory or governmental entities outside of Australia.

It may be necessary to release information or provide access to external service providers, such as:

- (a) any organisations involved in the provision of, management or administration of our products or services (such as custodians, registries, administrators, mail houses and information technology providers);
- (b) organisations engaged to provide electronic identity verification services (including Edentiti Pty Ltd ABN 67 111 307 361);
- (c) auditors, consultants and other professional advisors (including accountants and lawyers);
- (d) when required or permitted under law or in connection with legal proceedings, or
- (e) authorities investigating (or who could potentially investigate) alleged fraudulent or suspicious transactions in relation to an investment or account.

We will not sell your personal information nor will we provide it to third parties unrelated to the management of your investment or the provision of our financial products or services to you.

Direct marketing

We may also send you direct marketing communications and information about any other products or services offered by us that we expect may be of interest to you. These communications may be sent in various forms, including mail, fax and email. At any time you may opt-out of receiving marketing communications from us by contacting us (see contact details below).

Please note that, if we are currently providing you with services or products, we will still need to send you essential information about your account, the relevant services or products and other information required by law.

How you can access and correct your personal information held by us

You may request access to any of your personal information held by us. Generally, if the personal information held by us about you is incorrect, then we will correct it at your request.

Your right to access is subject to some exceptions allowed by law. We will notify you of the basis for any denial of access to your personal information.

Please contact our Privacy Officer using the below details to request access to any of your personal information held by us.

How can you complain about a breach of privacy?

If you have a complaint about a breach of this Privacy Policy including the manner in which we have collected, held, used, disclosed, kept, or given people access to your personal information, then you may make a complaint to us using the contact details set out below. You will need to provide us with sufficient details regarding your complaint and any supporting evidence.

Your complaint will be referred to our Privacy Officer who will investigate the issue and determine the steps we will take to resolve your complaint. We may ask you to provide additional information.

We will notify you in writing of our determination, generally within 30 days. If you are not satisfied with our determination or you do not receive a response within 30 days, then you can contact us to discuss your concerns and you can refer the complaint to the Office of the Australian Information Commissioner www.oaic.gov.au.

Accuracy, currency, and completeness of information

We will endeavour to ensure your personal information is kept accurate, complete, up to date and relevant. Please let us know if any of your details change. If you feel your personal information is not accurate, complete or up to date, then please notify us and we will take reasonable steps to ensure it is corrected. You can contact us using the details listed below.

We will consider if the information requires amendment. If we do not agree that there are grounds for amendment then we will add a note to the personal information stating that you disagree with it.

Are we likely to disclose your personal information to overseas recipients?

We will not disclose your personal information to overseas recipients, unless required to by law.

Request a copy of this Privacy Policy and further information

A copy of our current Privacy Policy is available from us free of charge from our website, www.australianfiduciaries.com.au. You can also request a copy of the Privacy Policy to be sent to you–

- (a) by email, by emailing your request to privacy@australianfiduciaries.com.au
- (b) by post, by calling 07 3272 6000 (+61 7 3272 6000 for international callers), or by writing to us.

Our postal address is:

Attn: Privacy Officer
Australian Fiduciaries Limited
PO Box 1358
Sunnybank Hills QLD 4109
Australia

If you would like a copy of this Privacy Policy in a particular form (for example, on audio disc), then please contact us and we will accommodate any reasonable request.

If you have any further questions relating to this Privacy Policy, or concerns about the way in which we have handled your personal information, then please contact our Privacy Officer.



Australian Fiduciaries Limited
ABN 22 601 228 844 (AFSL Number 465658)

"The pursuit of excellence with integrity"