

Privacy Policy

Primary Securities Ltd and its service providers are provided by information from investors and borrowers in order to establish and maintain records and to ensure all information is sent to investors, borrowers and regulatory bodies as necessary. The privacy of that information is important to us.

This privacy policy sets out the way we manage personal information received and is in accordance with the Privacy Act 1988 as amended and with the Australian Privacy Policies.

Each of Primary Securities Ltd's service providers has its own privacy policy which are consistent with this privacy policy. The privacy policy of each service provider is published on the website of that service provider and, where applicable, should be read in conjunction with this privacy policy.

Kind of Personal Information Collected and Held

In order to provide services to investors and borrowers in the managed investment schemes of which Primary Securities Ltd is the responsible entity/trustee or is the proposed responsible entity/trustee we may collect the following information:

- 1. Full name, date of birth, telephone, residential/business address, email and fax:
- 2. Identification documentation for the purpose of verifying identity and to ensure compliance with the Anti-Money Laundering and Counter-Terrorism Financing Act and other legislation and regulations regarding identification verification:
- 3. Tax file number, Australian Business Number and GST registration details for the purposes of tax reporting and withholding;
- 4. Bank account details for the purpose of making payments and also administering direct debit payments to Primary Securities Ltd when authorised to do so:
- 5. Contact information about investors' financial advisers;
- 6. Copies of any relevant trust deeds, partnership agreements or other documentation which may be required to comply with the Anti-Money Laundering and Counter-Terrorism Financing Act;
- 7. Powers of attorney;
- 8. Information relating to probate and estate administration.

How is information Collected and Held

We generally collect personal information from applications, questionnaires and other forms you complete and provide to us, from information you disclose to us on the phone, in correspondence, or in person, or from third parties.

If we are provided with personal information about you from a third party we will take reasonable steps to ensure that you are or have been made aware of the matters set out in this privacy policy.

We will only collect sensitive information about you with your express consent or if exempted by the Australian Privacy Principles, such as if the collection is required or authorised by law.

We may receive unsolicited personal information about you. We destroy all unsolicited personal information, unless the personal information is relevant to the purposes for which we collect your personal information.

Primary Securities Ltd holds personal information in a combination of secure computer data storage facilities and secure paper based files and takes all reasonable steps to protect the personal information held from misuse, loss and unauthorised access, modification or disclosure. Your personal information may be stored by third party data storage providers and may be combined or linked to other information held about you in a client file. Computer stored information is protected through the use of passwords.

Purpose for Collecting, Holding Using and Disclosing Personal Information

Primary Securities Ltd collects and holds information from investors and borrowers in order to establish and maintain records and to ensure all information is sent to investors and regulatory bodies as necessary.

Primary Securities Ltd uses or discloses personal information only for the purpose for which it was collected or related purposes which would reasonably be expected. Our service providers may handle your personal information and we prohibit them from using that information other than for the specific purpose for which it was supplied.

Primary Securities Ltd may be required by law to disclose personal information particularly to:

- 1. Government regulators or entities such as the Australian Securities and Investment Commission or the Australian Tax Office;
- 2. The Financial Ombudsman Service:
- 3. As required by a court order;
- 4. Pursuant to a request under section under s 173(3) of the Corporations Act 2001 (the right to receive a copy of the register of a scheme for use for a proper purpose).

Access and amendment

Investors may at any time request access to their personal information held by Primary Securities. Any errors in the information held will be amended on request.

Primary Securities Ltd will only refuse access where authorised by law.

Complaints

Any complaints regarding breaches of this privacy policy will be handled in accordance with Primary Securities Ltd's Complaints Procedures which can be accessed on the FAQ section of our website.

Disclosure of Information to Overseas Recipients

We may be required to disclose your information to service providers that are based overseas. Where possible the information will only be transferred to another country where we reasonably believe that the other country has privacy laws substantially similar to those of Australia.

Availability of Privacy Policy

A copy of this Privacy Policy is available from free of charge either by downloading a copy from our website or by contacting Primary Securities Ltd and requesting that a copy be sent to you by email, facsimile or post.

Investor Payments made by Credit Card

Personal information collected via this website is for the purpose of processing payments of credit card payments. Primary Securities Ltd follows generally accepted industry standards to protect the personal information submitted, both during transmission and once received

Primary Securities Ltd uses the eWAY Payment Gateway for its online credit card transactions. eWAY processes online credit card transactions for thousands of Australian merchants, providing a safe and secure means of collecting payments via the Internet. All online credit card transactions performed on this site using the eWAY gateway are secured payments.

- Payments are fully automated with an immediate response.
- The complete credit card number cannot be viewed by Primary Securities Ltd or any outside party.
- All transactions are performed under 128 Bit SSL Certificate.
- All transaction data is encrypted for storage within eWAY's bank-grade data centre, further protecting credit card data.
- eWAY is an authorised third party processor for all the major Australian banks.
- eWAY at no time touches your funds; all monies are directly transferred from your credit card to the merchant account held by Primary Securities Ltd.

For more information about eWAY and online credit card payments, please visit www.eWAY.com.au

After paying an account online an email confirmation will be received by the payer from eWay confirming the payment details.