

Privacy Policy - Divgro Pty Ltd

Divgro Pty Ltd ACN 633 109 789 ('Divgro', 'we' or 'us') are bound by the Privacy Act, its Amendment (Enhancing Privacy Protection) Act, and its Privacy Amendment (Notifiable Data Breaches) Act, and will protect your personal information in accordance with the Australian Privacy Principles. These principles govern how we can collect, use, hold and disclose your personal information, and how we respond when a data breach (including cyber and data security breaches), is likely to result in serious harm to any individuals whose personal information is involved in the breach.

What kinds of personal information do we collect and hold?

When you apply for an interest in our fund ('Fund'), we may collect information that is necessary to be able to provide you with an investment in the Fund. For instance, we may ask for identification information such as your name, address and date of birth.

We will not generally collect or hold sensitive information about you, unless we are required to do so by law. Sensitive information includes information about your race, political or religious beliefs, sexual preferences, criminal convictions, membership of professional or trade associations or unions or health 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.

In certain circumstances we may be required or permitted by law or Court or Tribunal order to collect certain personal information about you, including (but not limited to) information required under the following:

- Anti-Money Laundering and Counter-Terrorism Financing Act 2006 and Anti Money Laundering and Counter Terrorism Financing Rules Instrument 2007 ('AML/CTF Laws');
- Income Tax Assessment Act 1997 and Tax Administration Act 1953; and
- Foreign Account Tax Compliance Act ('FATCA').

Why do we collect, hold, use and disclose personal information?

The main reason we collect, use, hold and disclose personal information is so we can service your request concerning the Fund. This may include:

- Checking your eligibility for the Fund;
- Providing you with units in the Fund; and
- Helping you manage your interests in the Fund.

How do we collect personal information?

We collect most personal information directly from you. Sometimes we collect personal information about you from other people such as publicly available sources of information.

How do we hold personal information?

Much of the personal information we hold will be stored electronically and securely by us or at offices of an external fund administrator (where appointed). We use a range of security measures to protect the personal information we hold.

Who do we disclose your personal information to, and why?

Sometimes we may disclose your personal information to organisations outside our organisation. For example, with an administrator of the fund where appointed, so that it may perform its duties for the Fund.

Who do we notify when there is a data breach of your personal information?

In accordance with the Notifiable Data Breaches scheme under the Privacy Act, we are obliged to notify individuals whose personal information is involved in a data breach that is likely to result in serious harm (these are referred to as 'eligible data breaches'). This notification must include recommendations about the steps individuals should take in response to the breach. The Australian Information Commissioner ('Commissioner') must also be notified of eligible data breaches.

In summary, subject to certain exemptions, the scheme requires us to:

- Carry out a reasonable and expeditious assessment if there are reasonable grounds to suspect that there may have been an eligible data breach (and to take reasonable steps to complete that assessment within 30 days); and
- Make the prescribed notifications (to the Commissioner, and if practicable, to affected individuals) as soon as we are aware that there are reasonable grounds to believe that there has been an eligible data breach. The notifications must include a description of the data breach, the kinds of information concerned and recommendations about the steps individuals should take in response to the data breach.

Do we disclose personal information overseas?

We may disclose your personal information to recipients located outside Australia. These entities may include our service providers.

Do we use or disclose personal information for marketing?

We may use your personal information to offer you products other than the Fund that we believe may interest you. We will not do this if you tell us not to. If you don't want to receive marketing offers from us, please contact us on the details listed at 'Contact us'.

Access to and correction of personal information

You can request access to the personal information we hold about you. You can also ask for corrections to be made. To do so, please contact us on the details listed at 'Contact us'.

Revisions to this Privacy Policy

We may update this Privacy Policy from time to time. Please review it periodically for changes on our website at www.divgro.com.au

Resolving your privacy concerns and complaints - your rights

If you are concerned about how your personal information is being handled or if you would like to make a complaint, please contact us on the details listed at 'Contact us'.

If you are unhappy with our response, you can discuss your concerns with the Commissioner via www.oaic.gov.au.

Contact us

If you have a query relating to this Privacy Policy or wish to make a complaint, please contact our Compliance Officer by email at info@divgro.com.au

This information is provided for information only. It does not constitute an offer or invitation to enter into any legal agreement of any kind for units in the Fund.