

PRIVACY POLICY

Licensees:	Aurora Funds Management Limited
AFSL Numbers:	222110
Registered Address:	Suite 613, 370 St Kilda Road VIC 3004
Principal Place of Business:	Suite 613, 370 St Kilda Road VIC 3004

Policy Approver	Board of Directors
Policy Owner	Compliance Manager
Policy Delegate	Compliance Manager
Policy Version Date	July 2017
Policy Review Cycle	Annually
Next Policy Review Date	July 2018

Privacy Policy

Background

Aurora Funds Management Limited (**Aurora, we**) is subject to the Australian Privacy Principles (**Principles**) under the Privacy Act 1988 (Commonwealth) (**Act**) and to other laws that protect your privacy. The Principles are designed to protect the privacy of individuals by regulating the way personal information is managed.

In summary, the Act defines 'personal information' as information or an opinion relating to an individual which can be used to identify that individual.

Aurora respects your privacy and is committed to not misusing any personal information we have collected about you.

Purpose of Policy

This Privacy Policy outlines how we handle personal information including:

- from whom we collect personal information, and the types of personal information collected, held by us;
- how personal information is collected and held;
- the purposes for which your personal information is collected, held, used and disclosed;
- how you can gain access to your personal information and seek its correction if required;
- how you may complain or inquire about our collection, handling, use or disclosure of your personal information and how that complaint or inquiry will be handled; and
- the third parties to whom we may disclose personal information.

From whom do we collect personal information and what types of personal information do we collect?

In the course of conducting our business we may collect personal information from shareholders, interested parties, suppliers, employees, job applicants, work experience people or contractors.

The information we collect may include:

- **Personal Information** including names, addresses, email addresses and other contact details; dates of birth; financial information, age, employment status and details of your dealings with us.
- **Sensitive Information** including details of your professional memberships.

Information such as your bank account details and tax file number (TFN) are collected by our share registry (Registry Direct and One Registry). Please refer to their privacy policy for further details on how they manage the privacy of this information: www.registrydirect.com.au/privacy/. We may exchange your personal information with our share registry and handle your personal information to assess your applications, manage your investment and provide investor services. Some investor personal information is collected pursuant to the Taxation Administration Act and the Corporations Act, and we are also required to make limited shareholder details available to members of the public on request.

Aurora may collect sensitive information (e.g. from wholesale investors) in order to comply with the Anti-Money Laundering and Counter-Terrorism Financing laws (AML/CTF). This personal information may include government identifiers such as your TFN.

In respect of employees, potential employees and work experience people we also collect personal resumes, employment history, third party references, bank details, superannuation details, tax file numbers and emergency contact details. Aurora may also conduct criminal checks and bankruptcy searches on individuals as required. The results of these searches may be held on our employee files. We collect some staff personal

information pursuant to various laws including the Fair Work Act, Superannuation Guarantee (Administration) Act and Taxation Administration Act.

How do we collect and hold your personal information?

How Aurora collects personal information will largely be dependent upon whose information we are collecting. If it is reasonable and practical to do so, we collect personal information directly from you.

We may collect information about you when you:

- invest in the Aurora Funds;
- request information about Aurora;
- telephone, email or write to us;
- have a face-to-face meeting;
- apply for work experience with us;
- apply for employment with us; or
- accept an offer of employment.

We may also collect personal information from other organisations and people such as counterparties, Registry Direct and One Registry Services who provide share registry services including investor communication and voting facilities for the Aurora Funds, public sources, related bodies corporate and other independent sources, however, we will only do so where it is not reasonable and practical to collect the information from you directly.

Unsolicited Information

Sometimes we may be provided with your personal information without having sought it through our normal means of collection. This is referred to as “unsolicited information”. Where we collect unsolicited information we will only hold, use and or disclose that information if we could otherwise do so had we collected it by normal means. If that unsolicited information could not have been collected by normal means then we will destroy, permanently delete or de-identify the information as appropriate unless we are prevented from doing so by law.

How do we use your personal information

We use personal information where reasonably necessary for conducting our business and for other related purposes that would be reasonably expected by you, or to which you have consented or we are otherwise authorised by law.

Our uses of personal information include but are not limited to:

- providing, administering, improving and personalising our products and services;
- establishing your identity;
- maintaining and updating our records;
- managing our relationship with you and keeping you informed of the Aurora Funds business activities;
- providing you with information on other products and services that may be of interest to you
- complying with our legal obligations, and assisting government and law enforcement agencies and/or regulators;
- dealing with your enquiries and concerns;
- in the case of job applicants, considering you for positions with us;

- in the case of employees, managing your employment including paying your wages and employee entitlements, training, disciplining, health and safety, administration and insurance (including WorkCover).

Direct Marketing

We will not disclose your personal information to any unrelated third party for their marketing purposes.

If you do not want to receive emails and/or other communication from us, you can tell us by contacting us by using any of the contact details set out in this Privacy Policy.

Sensitive Information

We only collect sensitive information where reasonably necessary for one or more of the uses specified in this Privacy Policy and if we have the consent of the individuals to whom the sensitive information relates, or if the collection is necessary to lessen or prevent a serious threat to life, health or safety or another applicable legal basis applies.

Storage and security of your personal information

The security of your personal information is of paramount importance to us and we take reasonable steps to protect the personal information we hold about you from misuse, loss, unauthorised access, modification or disclosure.

These steps include, depending on the circumstances:

- restricting access to personal information to a 'need to know' basis.
- training and reminding our staff of their obligations with regard to your personal information, and the requirements of the Privacy Act 1998 (Cth) and the Australian Privacy Principles.
- ensuring where sensitive information is stored in hard copy files that these files are stored in lockable filing cabinets in lockable rooms. Access to these records is restricted to staff on a need to know basis.
- implementing physical security measures at our premises to prevent break-ins.
- implementing security systems, policies and procedures designed to protect personal information storage on our computer network.
- implementing policies and procedures designed to ensure that staff follow correct protocols when handling personal information.
- undertaking due diligence with respect to third party service providers who may have access to personal information, including cloud service providers, to ensure as far as practicable that they are compliant with the Australian Privacy Principles or a similar privacy regime.

Personal information we hold that is no longer needed, or required to be retained by any other laws, is destroyed in a secure manner, deleted or de-identified as appropriate.

Our website may contain links to other websites. We do not share your personal information with those websites and we are not responsible for their privacy practices. Please check their privacy policies.

When we disclose your personal information

We use and disclose personal information for the purposes for which it was collected by us and for purposes which are related to these purposes.

We may disclose your personal information to certain third parties including to assist us with one or more of our functions or activities, or where permitted or required by law. These third parties may include:

- our related bodies corporate;
- your representatives;

- organisations providing share registry services under an arrangement with us;
- those to whom we outsource certain functions, for example third parties that provide us with archival, accounting, legal, business consulting, banking, payment, delivery, data processing, data analysis, information broking, recruitment, training, website and information technology services or support;
- auditors and insurers;
- academic institutions (to verify education details) and referees;
- government and law enforcement agencies and regulators; and
- entities established to help identify illegal activities and prevent fraud.

We may disclose your personal information from time to time if one or more of the following apply:

- you have consented;
- you would reasonably expect us to use or disclose your personal information in this way;
- we are authorised, or required to do so, by law;
- disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety;
- where another permitted general situation applies (as defined in Section 16A of *the Privacy Act 1988 (Cth)*); or
- disclosure is reasonably necessary for a law enforcement related activity.

We use information storage systems located within Australia. If we are likely to disclose personal information about an individual to overseas organisations we will update this Privacy Policy or take reasonable steps to ensure you are aware.

How we ensure the quality of your personal information

We take reasonable steps to ensure the personal information we hold, use and disclose is accurate, complete and up-to-date. These steps include ensuring that the personal information is accurate, complete and up-to-date at the time of collection, and when using or disclosing the personal information.

On an ongoing basis we maintain and update personal information when we are advised by you or when we become aware through other means that your personal information has changed.

Please contact us if any of the details you have provided to us change. You should also contact us if you believe that the personal information we have about you is not accurate, complete or up-to-date.

How to gain access to your personal information we hold

You may request access to the personal information we hold about you, or request that we change and/or update the personal information we hold, by contacting us.

Upon request, we will give you access to the personal information held about you, unless specific limitations apply (e.g. if the request is frivolous or vexatious, or providing access would be unlawful).

We will respond to a request for access to personal information within a reasonable period after the request is made, and give access to the personal information in the manner requested by you, if it is reasonable and practicable to do so.

If we do not agree to provide you with access, or to amend your personal information as requested, you will be notified accordingly. Where appropriate we will provide you with the reason/s for our decision, and the mechanisms available to complain about the refusal. If the rejection relates to a request to change your personal information you may make a statement about the requested change and we will attach this to your record.

Privacy Complaints

If you wish to make a complaint about a breach of the Australian Privacy Principles by us, you may do so by providing your written complaint by email, letter or by personal delivery to any one of our contact details as noted in this Privacy Policy. You may also make a complaint verbally, either in person or by contacting us on the telephone number provided below.

We will respond to your complaint within a reasonable time (usually no longer than 30 days), and we may seek further information from you in order to provide you with a full and complete response.

Your complaint may also be taken to the Office of the Australian Information Commissioner. You may contact the Australian Information Commissioner by calling them on 1300 363 992, contacting them online at www.oaic.gov.au, or by writing to the Office of the Australian Information Commissioner at GPO Box 5218 Sydney NSW 2001.

How to contact us

If you would like to know more about how we manage your personal information or you wish to make a complaint, please contact us on **1300 553 431**, or write to or email us at the following address:

Compliance Manager
Aurora Funds Management Limited
PO Box 33281
Melbourne VIC 3004
Email: enquiries@aurorafunds.com.au