Privacy Policy

How do we collect your personal information?

Personal information can be collected using several methods including when you complete an application form, provide information on our website (e.g., subscribe to updates, responding to social media posts, attend an event or submit a query), or through our use of cookies.

The information provided directly by investors (or by an adviser acting as their agent) in application forms is required so that we can provide investment services to the investor.

What personal information do we collect and hold?

The kinds of personal information that we may collect, and hold include your name, date of birth, address, phone number, bank account details and Tax File Number (TFN).

We can also collect personal information about your internet usage and browser history in relation to our website via the use of cookies.

If we are no longer authorised or required by law to do so, we will not retain your personal information for any purpose.

Cookies

Like many websites, our site may use cookies by default. A cookie is a small text file that is sent to your computer (or other device) by the websites that you visit. Cookies may be used to enhance user experience and/or provide us with data to improve our site.

By using our site, you agree to the use of cookies for such purposes. You can refuse to accept cookies by modifying the settings in your browser. If you do refuse to accept cookies, you may not be able to use all the features of our site.

How do we use your personal information?

By providing us with your personal information, you consent to us using, disclosing and otherwise handling your personal information in accordance with this Privacy Policy as updated from time to time. We may use this information to administer, manage and generally service your investment including any legislative and regulatory requirements. This will enable us to provide customer service and administrative information, including;

- sending ad hoc marketing communications which we believe may be of interest to you;
- personalising your experience on our websites; and
- identifying usage trends and ongoing website enhancements for broader business purposes.

We may use information about your internet usage and browser history in relation to our financial products to enable full functionality to you and to help us improve the financial services we offer or market to you.

All external communications made based on collecting your personal information will include the ability to easily opt-out (unsubscribe) at any time, with the exception of operationally critical information which we are legally obliged to communicate. In receiving or remaining silent in confirming receipt, you are not bound or consenting to any further materials or obligations.

Who do we provide your personal information to?

We are only permitted to use and disclose your personal information for purposes that can be directly related to the financial services that we are authorised to provide. As such, the permitted purposes include:

- internal accounting, record keeping and auditing;
- unit registry; and
- performance monitoring; and
- data carrying by any parties authorised by you (e.g. your financial adviser or agent).

We outsource the collection of investors' personal information to third parties we appoint as administrators who are in Australia. The administrators' details are contained in the application form.

Our administrators may use and disclose your personal information for a permitted purpose which may involve the transfer of your personal information outside of Australia (including to countries such as the Cayman Islands, Germany, Hong Kong, India, Ireland, Malaysia, the Netherlands, Singapore, the United Kingdom and the United States where there may be less stringent data protection laws) to process personal information on our behalf. Where this is the case, it is not possible to ensure that the overseas recipient does not breach the APPs in relation your personal information. In providing us with your personal information, you consent to the possibility that your personal information may be transferred outside of Australia for processing.

We may also share personal information with the following parties for permitted purposes:

- our related parties within the Antipodes Group of companies;
- third parties we appoint as custodians located in Australia;
- an agent and/or adviser appointed by an investor;
- government authorities when required by law; and
- third party data carrying service providers that enable access to investors' personal and investment information by their appointed advisers.

How is my personal information protected?

We take cyber security and your privacy very seriously and have controls in place to protect your information and accounts. Along with our registry service providers (which by law house customer data), including Citi and Apex, we maintain strict security protocols and testing. This includes our online investor portal, which can only be accessed via two-factor authentication.

You will receive occasional emails from our registry service providers (including Citi and Apex), but if you are ever unsure or suspicious about an email or text relating to your investments, please contact our Client Experience team immediately (details at the top of this page).

There are also several steps you can take to help safeguard your personal information against cyber threats. Update your devices and software promptly, be vigilant about clicking any hyperlinks, use strong passwords and (where possible) multi-factor authentication, and regularly back up your files. For more information, visit the Australian Cyber Security Centre.

Provision of your personal information and your rights

We take reasonable steps to ensure the personal information we collect, use or disclose is accurate, complete and up to date.

You can request access to your personal information held by Antipodes Fund Services Limited (AFS) and our service providers. All requests can be directed to:

Privacy Officer
Antipodes Fund Services Limited
The Responsible Entity (or Trustee) of the [name of Fund]
Level 25, 264/278 George Street
Sydney NSW 2000

Phone: 1800 895 388 (AU) or 0800 442 304 (NZ)
Fax: +613 8611 6534
Email: privacy.officer@bennelongfunds.com

You may also request that we amend, correct or delete your personal information if we and our service providers are no longer authorised to hold it. However, we are not obliged to make those changes or provide such information where the law stipulates we retain it or provides us with the discretion to refuse.

Details of Responsible Entity (or Trustee)

Antipodes Fund Services Limited
ABN 39 111 214 085
AFS Licence Number 296806

Complaints

AFS treats complaints concerning privacy in the same manner as any other complaint about our products or services.

Please contact the Privacy Officer using the details provided above.

AFS will acknowledge your complaint within 14 days of receipt and will endeavor to resolve the complaint within 30 days. If AFS has not resolved the complaint within 30 days, or you are dissatisfied with the outcome of our internal complaints process, you have the right to contact the Office of the Australian Information Commissioner (OAIC) about your complaint via their online Privacy Complaint Form, available at: http://www.oaic.gov.au/privacy/privacy-complaints/