

## **1. PRIVACY POLICY**

### **1.1. Your privacy is important to Atlas**

Atlas Investment Services Pty Ltd and its related entities ("Atlas") respects and upholds the confidentiality of information and the privacy of individuals. Atlas treats the trust you have in us seriously and is committed to safeguarding the personal and financial details that you provide us. This statement summarises Atlas' policies regarding the collection, storage, use and disclosure of personal information, including sensitive information, that may be collected for one or more of the functions or activities of our core business or submitted to us through any of Atlas' websites or via any other means of collection. This policy applies to related bodies corporate within the Atlas group of companies and their employees, and to outsource service providers which collect personal information on behalf of those bodies corporate. Our privacy policy is available on our website and to anyone who asks for it free of charge.

### **1.2. Australian Law**

We are bound by the Privacy Act 1988 (Cth) and guided by the Australian Privacy Principles. Unless we have your direct permission to do otherwise, we will only collect and use your personal information as set out in this Privacy Policy.

### **1.3. Personal Information**

The personal information Atlas collects and stores may differ for investors, customers, service providers and prospective employees, but will usually include your name, current addresses, age or age group, bank account numbers or other financial statements or ancillary information (including tax file numbers), information about previous transactions and dealings you have had with us, email address, telephone/mobile phone number, fax number and personal correspondence, which includes emails. If you apply for, or we consider you for a possible employment position with us, we may also collect information about your qualifications, skills, experience and character and conduct screening checks (including reference, background, directorship, financial probity, identity, eligibility to work, vocational suitability and criminal record checks). When lending to borrowers, Atlas may collect tax returns or financial position statements which contain personal information.

### **1.4. Why do we collect, use and disclose personal information?**

Atlas offers various investment products and services to our investors and also strives to meet the needs of prospective investors and clients with product information and services. To do this effectively, we need to collect certain personal information. It may be necessary to keep a record of the transaction for business purposes or to enable us to respond to your concerns, or to improve our products or service. We may hold personal information for one or more of the following primary purposes:

- (a) internal accounting and administration;
- (b) to supply you with information about your investment accounts with Atlas including regular statements;
- (c) to respond to inquiries;
- (d) enhancing investor relations and investment opportunities;
- (e) in relation to prospective employees, to use and disclose your personal information to assess your application, conduct screening checks and consider and contact other persons about you;
- (f) in relation to the representatives of prospective borrowers who provide us with personal guarantees, to use and disclose your personal information to assess the viability of a proposed investment, conduct bankruptcy and credit checks and make related enquiries;

- (g) to inform you about updates or changes to the product or service you have acquired;
- (h) to provide information about us and our investment opportunities; and
- (i) to analyse our website usage and to help us improve the structure, layout and usability of our websites and to enable you to participate in any interactive features of those websites.

Your personal information will not necessarily be made available to all of our staff. Access to your information will generally be restricted to those staff who require the information for the purposes set out above. Occasionally we require organisations outside Atlas to provide a service for purposes which are necessary for us to conduct the functions or activities of our core business. We will take such steps as are reasonable in the circumstances to ensure these organisations both inside and outside of Australia deal with personal information according to this policy and do not breach the Australian Privacy Principles in relation to the information.

#### **1.5. How we collect personal information**

As a client with Atlas, we will need to obtain sufficient relevant information about your financial situation to understand your needs and objectives so we can provide you with products and services, provide you with information and marketing material and satisfy certain legislative and regulatory requirements. Personal information is information that can identify you. Only personal information which is relevant to Atlas' business relationship with you will be collected. Atlas mainly collects personal information directly from you in a number of ways such as:

- (a) during face-to-face meetings;
- (b) when you complete and submit an information or application form;
- (c) through conversations via telephone;
- (d) when you subscribe to one of our publications;
- (e) an email you send us; and
- (f) when you visit our website

#### **1.6. The personal information we collect from you**

Some personal information we collect from you requires your consent, for example, opening an account or issuing investment products to you. We may from time to time use certain personal information as part of improved investor relations or for marketing purposes that we think will be useful to you. Our marketing communications will provide you with details of how to opt-out. Certain 'sensitive information' is afforded higher protection in the Privacy Act 1988 (Cth) and the Australian Privacy Principles. Sensitive information includes, for example, information or an opinion about an individual's racial or ethnic origin, membership of a political association, religious beliefs or affiliations and philosophical beliefs. Sensitive information is subject to greater restrictions in that it may only be collected with your consent, it must not be used or disclosed for a secondary purpose unless the secondary purpose is directly related to the primary purpose of collection and such use is within your reasonable expectation. Further, sensitive information cannot be used for the secondary purpose of direct marketing.

#### **1.7. Consent**

By communicating, investing or dealing with Atlas, including by submitting information through our website, you consent to the information you provide being collected, stored, used and disclosed by us in accordance with our privacy policy.

#### **1.8. Websites**

- (a) The type of information collected when you visit a Atlas website includes your IP address, the date and time of your visit, the pages accessed and the documents retrieved (although this information about your activity on our websites is not used to identify you personally, unless required by law) and the type of browser used.
- (b) When you visit a Atlas website, our server may attach a small data file known as a “cookie” to your hard drive. This enables us to analyse usage patterns on our websites in order to tailor it to our users’ needs. The cookies used on our site only identify your computer to our servers when you visit our website and are not linked to particular individuals unless required by law. Most web browsers are set to accept cookies. If you do not wish to accept cookies, you can refuse the transfer of cookies to your computer’s hard drive by adjusting your internet browser.
- (c) Atlas’ websites may contain links to other websites that are not owned by Atlas. Our privacy policy does not extend to your use of these sites and you should refer to the respective privacy policies of such websites.

#### **1.9. Secondary Purpose**

Atlas may lawfully disclose your personal information for purposes other than the purpose for which it was collected (secondary purpose) in certain circumstances, including where you would reasonably expect us to disclose the information for that purpose. We can (and you authorise us to) disclose any information about you as we, in our sole discretion, reasonably believe necessary or as otherwise permitted under the Privacy Act 1988 (Cth), including: a. when disclosure is required or authorised by or under an Australian law or a court or tribunal order; b. to lessen or prevent serious threat to your health and safety or to public health or safety; c. to take appropriate action where we have reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to our business functions or activities has been, is being, or may be engaged in; d. to assist another entity, body or person to locate a person who has been reported as missing; e. for the establishment, exercise or defence of a legal or equitable claim; f. for the purposes of a confidential alternative dispute resolution process; g. for one or more enforcement related activities conducted by, or on behalf of, an enforcement body. Atlas does not sell personal information.

#### **1.10. Security of your personal information**

You may have contact with us personally, by telephone, mail, over the internet or other electronic medium. We take such steps as are reasonable in the circumstances to keep your personal information secure in a combination of secure computer storage, hard copy files and other records to protect the personal information we hold from misuse, interference, loss, unauthorised access, modification or disclosure.

#### **1.11. Accuracy and access of your personal information**

You have the right to access the personal information you have provided to us. If you require details of your personal information held by us, we will need to verify your identity before meeting your request, which we will process in a reasonable time. We will take such steps as are reasonable in the circumstances to give access in a way that meets the needs of both Atlas and the individual. Atlas is committed to ensuring the continued accuracy of all personal information held by us. If we are satisfied, having regard to the purposes for which your information is held it is inaccurate, out of date, incomplete, irrelevant or misleading, or you request us to correct that information then we will promptly correct it and notify any related bodies corporate of the corrections. When your personal information is no longer needed by us we will remove any personal identifiers or we will ensure the secure destruction of the records. As far as permissible under law, Atlas accepts no responsibility for the unauthorised access of personal information it holds.

#### **1.12. Changes to our privacy statement**

From time to time it may be necessary for us to review and revise this privacy statement. We reserve the right to change our privacy statement at any time and to notify you by publishing an updated version on Atlas’s websites.

**1.13. How to contact us if you have a problem or complaint**

If you have any queries in relation to this policy, or to make a request to access or correct your personal information or to make a complaint in relation to our handling of your personal information, please contact:

Atlas Investment Services

A. Level 26, 360 Collins Street, Melbourne VIC 3000 Australia

P. +61 3 8652 9279

E. [operations@atlasau.com.au](mailto:operations@atlasau.com.au)