

Privacy Policy

Ironbark Asset Management Pty Ltd

Dated: 1 June 2024

Entity

Ironbark Asset Management Pty Ltd
ABN 53 136 679 420 AFSL 341020
Level 14, 1 Margaret Street, Sydney NSW 2000

Contact details

If you have an enquiry or would like more information about Ironbark Asset Management Pty Ltd, you can speak to an Ironbark representative, Monday to Friday (excluding public and bank holidays in Sydney).

Ironbark Client Services:



1800 034 402



client.services@ironbarkam.com



www.ironbarkam.com

About this document

This Privacy Policy (**Policy**) applies to Ironbark Asset Management Pty Ltd (ABN 53 136 679 420) and its related bodies corporate (Ironbark, we, our or us), and describes how Ironbark collects, handles, and protects the privacy of your personal information.

This Policy outlines the types of personal information that we usually collect, the purposes for which we collect it, to whom we disclose it, how we hold and keep it secure, and your rights in relation to your personal information, including how to complain and how we deal with complaints.

We will handle your personal information in accordance with this Policy and applicable laws, including the Privacy Act 1988 (Cth) (Privacy Act) and the Australian Privacy Principles (APPs).

In this Policy, '**personal information**' means any information or opinion about an identified individual or an individual who is reasonably identifiable, whether true or not, and whether recorded in a material form or not. Examples of personal information include an individual's name, signature, address, phone number or date of birth or any other information about an individual where their identity is apparent or can reasonably be ascertained.

'**Sensitive information**' is a subset of personal information. Sensitive information includes information about an individual's racial or ethnic origin, political opinions or associations, religious or philosophical beliefs, trade union membership, sexual orientation or practices, criminal record, health or genetic information, and some aspects of biometric information.

We regularly review our practices and procedures regarding how we collect, hold, use, disclose and otherwise manage personal information. As a result, this Policy may be updated from time to time. Where we update this Policy we will make the updated Policy available, including on our website.

What personal information does Ironbark collect?

The personal information that Ironbark collects will depend on the circumstances, including whether we collect the information from you as an investor, customer, supplier, contractor, stakeholder, job applicant or in some other capacity.

We collect personal information so that we can provide our financial products and services, comply with our legal obligations (such as those under relevant taxation laws, the Corporations Act 2001 (Cth) and the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)), monitor compliance in accordance with our internal policies and perform other necessary functions and activities of our business.

If we do not collect your personal information, we may not be able to provide you with a financial product or service or may be limited in how we can deal or interact with you.

The types of personal information that Ironbark may collect when providing financial products or services include:

- your name and contact details, including address, email and phone number;
- passport information, drivers licence information or other identify information;
- financial information and banking details;
- date of birth and citizenship status;
- tax file number (TFN) and employment details; and
- details of your spouse, dependents or beneficiaries.

In addition, Ironbark may collect personal information about individuals who are not customers or investors with Ironbark (for example, business contact details of a company representative).

If you are applying for a job with us, we may also collect your:

- name and contact details, including address, email and phone number;
- passport information, drivers licence or other forms of identification
- your date of birth;
- employment history and qualifications;
- regulatory accreditation records;
- employment references;
- directorship and property ownership details;
- citizenship and entitlement to work in Australia documents (e.g. VEVO records);
- social media;
- police records; and
- credential information.

We may also collect sensitive information (such as information about your health) if necessary to provide you with a financial product or service. If we need sensitive information, we will ask for your consent prior to collecting this information.

How does Ironbark collect personal information?

We may collect your personal information in different ways depending on you interact or deal with us, including:

- from you directly when you contact us or our service providers by telephone or email;
- through your interaction with our website or social media platforms;
- from anyone authorised or acting on your behalf;
- when you complete an application form;
- through you meeting or having discussions with one of our Ironbark representatives;
- through third parties with whom we interact in order to provide our financial products and services; and
- from publicly available sources, including social media.

We will generally collect personal information about you directly from you. However, in some circumstances, Ironbark may collect information about you from third parties. For example, Ironbark may collect personal information about you from:

- your representatives or professional advisors (for example if we collect information from your accountant or financial advisor);
- our service providers (such as our third party identity verification service providers);
- your employer, where you are acting as a representative of your employer in dealing with us;
- corporate clients, where we are providing services; and
- referees, where you are a prospective employee.

Information collected through Ironbark's website

Ironbark may collect information based on how you use Ironbark's website or digital media. Ironbark uses "cookies", analytic tools and other data collection methods to collect anonymous information on website users and their activities. Cookies are small text files that are placed on your computer by the websites that you visit. Cookies are widely used in order to make websites work or for efficiency, as well as to provide information to the owner of the website.

Information Ironbark collects may include (but is not limited to) how the website is found, which pages are viewed, the frequency a visitor may come to the website. This information is combined into an overall picture of the nature of the person who uses our website and does not individually identify you.

If you are uncomfortable with the use of cookies, you can manage and control them through your browser settings, this includes by deleting them from your 'browser history' (cache) when you leave the website.

This information is collected for use within Ironbark and by preferred vendors for our analysis, to measure the success of our digital advertising and social media, and to improve our ability to provide relevant information and content to users.

No attempt is made by Ironbark to personally identify you through your use of the website, except when you submit a digital form. If you complete and submit a form on our website or a social media channel, you agree to enter your information onto those platforms. The information we collect is stored, accessed and used by us to administer those platforms as required.

If you access your account information online through a secure area, we will collect information about your visit using cookies to track your use of our website. This information is collected for security purposes and to protect the integrity of your account details. Your secure information may be accessed by an agreed third-party provider that may host your information on behalf of Ironbark. You can authorise third parties (such as your financial adviser) to have access to your information on a secure website (specific terms and conditions may apply in these circumstances).

Where Ironbark acts on behalf of a third party financial product issuer, Ironbark is remunerated by receiving a percentage share of the management and/or incentive fees for the financial product and there is no additional cost to investors.

You may request further particulars about our remuneration and any other benefits by contacting us.

You may receive advice about our financial products and services from a financial adviser who is a representative of another licensee. These financial advisers may receive remuneration including fees, commissions and/or other benefits from us if you invest in one of our financial products. Your financial adviser will disclose all remuneration details in a Statement of Advice that they are required to give to you when providing personal financial advice.

How does Ironbark secure and store your personal information?

We store your personal information in hard copy and electronically, and some data will be stored with our third-party providers. Ironbark takes all reasonable steps to protect your information from loss and unauthorised access, destruction, use, modification, or disclosure.

Ironbark have implemented a range of technical security measures such as secure authentication, password controls, encryption, firewalls and anti-virus technology to prevent unauthorised access to your personal information. Any vendor engaged by Ironbark is required to comply with similar protection measures.

Personal information may be held or accessed by a third-party service providers located overseas, including the Philippines and the United States of America.

We will destroy or de-identify personal information once permitted by law and if we no longer need to retain the personal information.

How does Ironbark use your personal information?

Ironbark may collect, hold, use or disclose your personal information to provide you and our corporate clients with a range of financial products and services such as:

- establishing and managing your investment in our investment funds;
- providing you with trust, funds or fiduciary services; and
- providing our corporate clients with trust, fund or fiduciary services.

Ironbark may also collect, hold, use or disclose your personal information to:

- facilitate your participation in any event that is hosted by Ironbark;
- provide you with information about our products and services or respond to queries you submit to us;
- process and administer any employment application you may make to us from time to time;
- manage, develop and enhance our products and services;
- consider any feedback (including a complaint) that you raise with or involving Ironbark;
- prevent or investigate any actual or suspected fraud, unlawful activity or misconduct;
- identify you or establish your tax status under any Australian or foreign legislation;
- comply with any relevant laws, regulations, codes of practice and court orders;
- consider applicants to provide goods or services to Ironbark; and
- to comply with our legal obligations, resolve any disputes, and enforce our agreements and rights with third parties.

How does Ironbark deal with direct marketing?

In addition to the purposes set out above, we may collect, use and disclose your personal information to inform you of products, services or offers of Ironbark or its related companies which may be of interest to you. Where you are an investor in an Ironbark financial product, this may include providing you with direct marketing information regarding other financial products or services of Ironbark that we think may be of interest to you.

If you do not want to receive this information or do not want us to use or disclose your personal information for direct marketing purposes, you can opt out by letting us know that you wish to opt out of receiving this information and/or Ironbark using or disclosing your personal information for direct marketing purposes.

How is personal information disclosed to others?

In the course of providing our financial products and services to you, we may disclose your personal information to our related parties or third party service providers that perform a range of services on our behalf, some of which include:

- mailing house or printing services;
- custodians and administrators;
- registry and platform providers;
- auditors and solicitors;

- insurance providers;
- information technology service providers; and
- other consultants or service providers.

Some of the parties that Ironbark discloses your personal information to may be located outside Australia, including the Philippines and the United States of America.

Depending on the nature of the financial product or service that Ironbark provides, we may disclose your personal information to your nominated representative (such as, your accountant or financial adviser) and their respective service providers.

We may also disclose your personal information to law enforcement agencies, courts or government agencies where required to comply with specific legal requirements.

How can you access or correct your personal information?

We will endeavour to ensure that the personal information collected from you is up to date, accurate and complete.

You may request access, or correction of, the personal information we hold about you at any time by contacting our Privacy Officer. We may need to verify your identity before responding to your request and may ask you to provide us with additional information as part of such verification. Subject to any applicable exceptions or requirements, we will provide you with access to the personal information you request within a reasonable time. If we decide to refuse your request, we will tell you why in writing and how you can complain if you are not satisfied with our decision.

You will not be charged for making a request for your personal information. However, we may charge a fee to provide you information to cover administrative costs (including for supervised inspection). We will inform you of any fee at the time your request is made.

How can you complain if you have concerns about how Ironbark has managed your personal information?

Where you may have a complaint relating to how Ironbark has managed your Personal Information, please contact us using the information below. Where possible, we will seek to respond to privacy complaints within 30 days of the date of the complaint.

If we cannot resolve your complaint within 30 days, we will contact you to advise you of the maximum response timeframe for your complaint.

What can you do if you have not received a response to your complaint or you are unhappy with the outcome?

If a complaint remains unresolved or you are unhappy with the outcome, you may contact the Australian Financial Complaints Authority (AFCA) or the Office of the Australian Information Commissioner (OAIC).

The OAIC contact details are below:

Phone 1300 363 992
Online enquiry <https://www.oaic.gov.au/about-the-OAIC/contact-us>
Website www.oaic.gov.au
Address Office of the Australian Information Commissioner
GPO Box 5288
Sydney VIC 2001

The AFCA contact details are below:

Phone 1800 931 678
Email info@afca.org.au
Website www.afca.org.au
Address Australian Financial Complaints Authority
GPO Box 3
Melbourne VIC 3001

How To Contact Us?

If you have any questions about this privacy policy or you wish to access or correct your personal information, please contact Ironbark's Privacy Officer:

Phone 1800 034 402
Email Privacy@ironbarkam.com
Address Privacy Officer
Ironbark
Level 14, 1 Margaret Street
SYDNEY NSW