



KAKARIKI CAPITAL PTY LIMITED ACN: 145 060 073
License No: 365948

PRIVACY POLICY

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LIMITED**
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KAKARIKI CAPITAL PTY LIMITED- PRIVACY POLICY

What is this policy about?

Kakariki Capital Pty Limited (“**Kakariki Capital**”) recognises the importance of ensuring that its customers have confidence in the way their personal information is dealt with.

This document sets out the policy of Kakariki Capital for handling personal information. Kakariki Capital is bound by, and committed to the terms of the Privacy Act 1988 and the National Privacy Principles forming part of that Act.

Any reference to “**Kakariki**” includes Kakariki Capital Pty Limited and its authorised representatives, including Kakariki Nominees Pty Ltd.

Kakariki Nominees Pty Ltd participate actively in Kakariki Capital’s compliance program. Their compliance programs are incorporated into the Kakariki Capital compliance program including participation in Kakariki Capital policy statements and registers. Kakariki Capital applies the same policy standards as contained in this document in reviewing and monitoring its authorised representatives, including Kakariki Nominees Pty Ltd.

Our related body corporates

Kakariki Capital has related body corporates, being Kakariki Nominees Pty. The Privacy Act permits these companies to share the personal information which they hold, unless you agree otherwise. If related companies are entitled to use that personal information, they may only do so for the purposes for which the personal information was originally collected.

What is personal information?

Personal information is any information about an individual that identifies the individual or by which their identity can reasonably be ascertained.

What kinds of personal information do we collect and hold about you?

Kakariki only collects personal information that is necessary for one or more of its functions or activities. The types of personal information which is collected from our clients and suppliers (including employees of our clients or suppliers) includes name, address and other contact details, as well as information about products and services which those individuals request from Kakariki from time to time.

How is personal information collected?

Most information we hold about clients is collected from the client's application form. Information may also be collected over the phone or via the internet during the course of the client's relationship with Kakariki. Sometimes, information about an individual is collected from other people or organisations. For example, information about a director of a corporate customer may be obtained from a public record relating to the company. Regardless of how it is collected, all personal information is handled in accordance with this privacy policy.

What does Kakariki use your personal information for?

Kakariki uses the personal information it holds in order to provide its clients with the services they request. Kakariki's services include funds management services and related investment advice. Providing a client with service includes undertaking activities such as administering the client's accounts or investments, providing client support, responding to inquiries and requests for product information and meeting regulatory requirements.

If Kakariki is unable to collect personal information from or about an individual, it may not be able to do business with that individual or the organisation with which the individual is connected.

We may also use personal information for our own internal purposes and we may use that information for marketing purposes, to inform you about new products and services or special offers from time to time. If you do not wish to receive marketing material from Kakariki, please let us know by contacting info@kakarikicapital.com and we will cease sending it to you. Kakariki may also collect personal information from its suppliers in order to complete business transactions and purchase products and services.

If we want to use your information for purposes other than those set out above, we will request your consent.

Does Kakariki disclose the personal information it holds?

Sometimes Kakariki obtains services from other organisations and where necessary (and where the law permits), personal information will be provided to those organisations. The kinds of services obtained externally by Kakariki include information technology support, financial advice, legal advice and the use of settlement and clearing systems.

External service providers are only authorised to use personal information for the purpose for which Kakariki supplied it. Those organisations are not authorised to use that personal information for their own purposes.

Where a customer nominates someone to act on their behalf, Kakariki may provide information to that person, for example, the client's accountant or financial adviser.

Sometimes, the law requires Kakariki to disclose personal information. For example, information may be disclosed to a court in response to a subpoena or to a Government agency such as the Australian Taxation Office on receipt of a direction issued under taxation laws.

Security and accuracy of personal information

Kakariki will take reasonable steps to ensure that all personal information we collect or use is:

- accurate, complete and up-to-date;
- stored in a secure environment; and
- accessed only by authorised personnel for permitted purposes.

If your details change, we ask that you advise us of the change as soon as possible in order that we may maintain accurate records.

Website

We have implemented procedures and installed equipment to safeguard the security and confidentiality of personal information collected via our website. We continually review these arrangements to ensure that we are doing all that is reasonably and technically feasible at the time to protect your information, although because of the nature of the internet, we cannot guarantee that it is totally protected from hackers or misuse.

This privacy policy does not apply if you access another website through a link from ours. In this case the privacy policy of the owner of the other website (if any) will apply. We cannot and do not make any warranty or representation as to the practices of any linked websites in the handling of your personal information.

Access to personal information

You are entitled to access most personal information Kakariki holds about you. If you would like access to your personal information, please contact the Kakariki Capital Privacy Officer at:

*Kakariki Capital Pty Limited
C/-Privacy Officer*

*Level 12, 17 Castlereagh Street
Sydney NSW 2000*

*Ph: +61 8277 7000
Email: info@kakarikicapital.com*

Resolving concerns

If you believe that the privacy of your personal information has been compromised, you are entitled to complain. Complaints can be made by contacting the person or department you were dealing with or by contacting the Privacy Officer, Isabelle Jensen, on the above number or at the above address. We will respond to complaints as soon as possible.

Additional information

If you would like more information about Kakariki's approach to privacy, you are encouraged to contact the Privacy Officer, Isabelle Jensen, on the above number or at the above address.