

## **PRIVACY POLICY**

### **Our commitment to privacy**

This Privacy Policy relates to 8IP Emerging Companies Limited and its related bodies corporate ("8EC", "we", "us" and "our").

8EC recognizes an individual's right to privacy and understands the protection and confidentiality of your personal information is important to you. 8EC is bound by the *Privacy Act 1988 (Cth)*.

This Privacy Policy outlines the type of personal information we collect, how that information is collected, used, stored and protected, and to whom we may disclose your personal information. We may also provide you with additional information about how 8EC will use your personal information at the time that it is collected.

### **Personal Information We Collect**

Any information that identifies you is deemed to be personal information. We primarily collect this information through our standard forms, information you provide through our website, and when you phone or contact our staff.

The type of personal information 8EC may collect from you includes – your name, contact details (such as your address and telephone number), date of birth, individual investment details, bank account information and tax file number. The *Corporations Act 2001 (Cth)* requires us to collect your name, address and date of birth. The Government's anti-money laundering laws may also mandate us to collect additional personal information from you.

Phone calls to the staff of our Investment Manager may be recorded or monitored for quality control, training, regulatory or other compliance reasons.

If you do not provide personal information to us, we may not be able to provide you with the services or information you require. In most cases, we will collect your personal information directly from you. In some cases, we may also collect your personal information from a third party such as a financial planner.

When browsing our website web servers automatically collect standard information as part of the HTTP web protocol – your IP address, browser type, operating system, access times, referring sites, pages viewed and other anonymous information. Generally personal information collected on our websites is what you give us when you login, complete a form or perform a transaction.

Cookies are a small simple text file placed on your computer by a website. We use cookies to collect statistical usage information to enable us to improve our websites. These cookies cannot be used to personally identify you. Session cookies are also used when login to our secure website to manage your security and enhance your user experience.

### **How We Use Personal Information**

8EC uses your personal information to administer your investment, comply with relevant laws and communicate with you on an ongoing basis about your investment and the market. We may also send you educational and marketing material about our other products and services we offer – you may contact us at any time to ask us not to send this information.

8EC may use information that you provide through our website or over the phone for analysis to improve our products and services.

Staff may also use personal information to verify your identity over the phone.

In some circumstances 8EC may disclose your personal information to persons/entities outside of 8EC.

For example:

- 8EC uses agents and external providers to help us provide our services to you (such as our registry provider, mailing houses, printing companies and external consultants).
- From time to time we may be required to provide your details to a governmental or regulatory body (such as ASIC, ATO, AUSTRAC, foreign regulators for purposes of tax reclaims for our Funds or law enforcement agencies).
- A court order may require us to disclose certain information.

8EC takes steps to ensure that our agents and third parties keep your personal information confidential and use it only for the purposes for which they, and 8EC, are authorized.

You may also authorize us to disclose information we hold about you to your financial adviser\*, administrator\* or other person nominated by you. Your express consent is required.

*Exemption Note* – 8EC intends to rely on some of the exemptions permitted under the Privacy Act. For instance, the exemption for disclosing personal information to our related bodies corporate.

\*If you nominate an individual contact within an Advisory firm or Administrative firm, 8EC deems (in order to protect the privacy of our Investors) that you give authority to the firm and not the individual contact.

### **Personal Information Security**

8EC regards the security of your personal information as a priority and has a number of physical and electronic protection measures in place.

You should be aware that the Internet is not a secure environment. Whilst 8IP takes reasonable steps, we cannot guarantee the security of information you provide to use via our website or that we make accessible to you via the secure investor site. No personal data is stored on our public website. Personal data is stored on our secure investor site.

### **Access To Your Personal Information**

In many circumstances you can request access to personal information we hold about you. Sometimes it is not possible for us to give you access in which case we will explain why.

8EC will take reasonable steps to correct personal information held about an individual where 8EC is satisfied that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading or, you request that 8EC corrects the information.

### **Need To Contact Us?**

If you have any questions about this Privacy Policy, or wish to make a complaint about how 8EC has handled your personal information, or you wish to access or correct your personal information held by us, please contact:

Gary Cullen  
Head of Risk and Operations, Eight Investment Partners  
Tel: (02) 8274 2088  
Email: gary.cullen@8ip.asia