

Federation - Privacy Policy

This Privacy Policy is designed to tell you what will happen to the information you provide through this website or through any other form of communication with us, Federation Asset Management Pty Ltd (ABN 39 628 789 220, Authorised Representative No. 001274690) (**Federation**), our wholly owned subsidiaries, or our agents or contractors. Please be sure to read this entire Privacy Policy before using this website or submitting personal information to us or our agents or contractors.

Personal Information

This Privacy Policy concerns any personal information or sensitive information of yours which is provided to us.

Personal information is any information about an identified individual or an individual who is reasonably identifiable, whether the information is true or not and whether the information is recorded in a material form or not.

Sensitive information is any personal information about your racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health, genetics, biometrics or biometric templates. We generally do not wish to be informed of a person's sensitive information. We, in any event, will collect, use or disclose sensitive information about you only as allowed by law, for example where we have received your consent to do so or the collection is required by law.

Your consent

By using this website or otherwise providing us directly, or through others, with your personal information, you agree with the terms of this Privacy Policy and consent to the collection, use, and disclosure of that information in accordance with this Privacy Policy, the *Privacy Act 1988* (Cth) as amended (including the Australian Privacy Principles) (the **Act**) and other applicable privacy laws.

Passive information collection

As you navigate through this website, certain information can be passively collected (that is, gathered without you actively providing the information) through various technologies, such as cookies, internet tags or web beacons and navigational data collection.

This website may use and combine such passively collected anonymous information to provide better services to website visitors, customise the website based on your preferences, compile and analyse statistics and trends and otherwise administer and improve the website for your use. Such information is not combined with personally identifiable information collected elsewhere on the website unless you have consented.

How we collect your personal information

We collect personal information that is necessary for our business activities and in order to provide and develop our services. We may do this in a number of ways, including:

- directly from you, when you provide it to us or our agents or contractors;

- through communications between you and our representatives or advisers;
- your use of our website;
- from publicly available resources (such as ASIC);
- you completing application forms in relation to our products and services;
- through other avenues, where required to meet regulatory requirements and comply with the law;
- by analysing our own records of your use of our services and website; or
- through marketing activities which request information from you, such as surveys.

We may also need to collect personal information from third parties (such as financial planners, solicitors or accountants) if it is unreasonable or impracticable to collect it directly from you, provided we collect this information by lawful and fair means.

What personal information do we collect and why?

The types of personal information we collect may include:

- information that identifies you, such as your name and date of birth;
- contact details, including telephone numbers, email and postal addresses;
- your source of funds;
- investment information;
- the nature of your business;
- identity information such as your passport and driver licence details;
- if you are an entity such as a corporation or trust, your governing documents and details related to certain of your direct and indirect members and authorised signatories;
- your income, net assets or other relevant information related to your status as a wholesale investor;
- your country of residence;
- nominated beneficiaries of a superannuation fund;
- accounting records;
- your tax file number and taxation records; and
- your bank account details.

If we are not provided with the personal information that we request, we may not be able to meet your request or provide our products or services to you.

Why does Federation collect this information?

The personal information you provide us may be used for a number of purposes connected with our business operations, which include (but is not limited to):

- to verify your identity;
- to administer our investor and potential investor relationships;
- to make, maintain and manage investments for an investor including in any Federation fund from time to time;
- to provide information to the trustee, administrator and custodian of a Federation fund;
- to perform our obligations and exercise our rights in connection with a contract between us, or with another counterparty;
- maintaining compliance with all legal and regulatory obligations, industry standards, internal policies and procedures and preventing fraud. This includes, for example:
 - legislation such as the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)* (**AML/CTF Act**) may require us to ask you for information to check your identity (e.g. by referring to your driver's licence, birth certificate or passport) or monitor your use of a financial product;
 - our financial services license may require us to certify your status as a wholesale investor before we can provide you with a financial product or financial product advice; or
 - legislation including without limitation, the *Foreign Account Tax Compliance Act 2010 (FATCA)* US tax legislation (or any related local Australian legislation) which requires us to identify US taxpayers and seek information on any US indicia which may be relevant to you and the Australian tax laws passed to implement the Common Reporting Standards which requires us to identify foreign residents and collect and report financial account information (including identify, account balances and payments) of foreign residents.

Your personal information may be used so that we, our wholly owned subsidiaries, agents and contractors can provide you with information about our products and services, such as by way of direct mail or telemarketing, and, where you have opted in, by email, SMS and MMS, or to request your feedback for promotional purposes. You always have the right to opt-out of receiving such information. You may exercise that right by contacting us as set out below.

We may also use your personal information for purposes related to those described above which would reasonably be expected by you.

We will not use your information for purposes other than those described above unless we have your consent or as permitted by law (including for law enforcement or public health and safety reasons).

Sharing your personal information

As part of administering and managing your investments, we may disclose the personal information we collect to other associated Federation companies or organisations

outside Federation which help us with our business, or regulatory or tax authorities. We take reasonable steps to ensure that any third party we disclose your personal information to is bound by confidentiality and privacy obligations to protect information about you.

We also may disclose your personal information to:

- solicitors, accountants, real estate agents or other advisers;
- outsourced service providers; and
- regulatory or tax authorities where we are required to disclose the information under law.

When making such a disclosure we will take reasonable steps to ensure that the recipient is bound by privacy obligations.

We will only disclose your personal information for the particular purpose for which it was collected, unless:

- you have consented to the disclosure;
- if you would reasonably expect us to use or disclose the information for a secondary related purpose;
- if required or authorised by Australian law for example to a court, ASIC or the Australian Taxation Office or the police; or
- an exception applies under the Australian Privacy Principles, such as in relation to suspected unlawful activity.

Does my personal information leave Australia?

We will only send your personal information outside Australia:

- if we are authorised to do so by Australian law for example to a court, ASIC or the Australian Taxation Office or the police;
- if you would reasonably expect us to use or disclose the information for a secondary related purpose;
- for any of the purposes set out in this Privacy Policy (but only to parties that are subject to obligations in relation to personal information no less onerous than those in this Privacy Policy); or
- if you have consented to us doing so.

We may require you to consent in writing or assume you have consented if you fail to exercise your option to withhold your consent, such that it can be reasonably inferred from the circumstances and your conduct that you consent to your personal information being disclosed (implied consent). If you provide your consent, you acknowledge that Federation may not be taking any steps to ensure that the information will be dealt with by the overseas entity in accordance with the Australian Privacy Principles, and that Federation will not be accountable under the Privacy Act for such disclosure and you will not be able to seek redress pursuant to the Privacy Act.

Access and correction

You may request access to any of the personal information we hold about you by contacting us as specified below. This service is free unless the personal information you request requires research or preparation time. Before we act on your requests, we will give you an estimate of how much this service will cost and ask you to agree before proceeding.

Access to your personal information is subject to some exceptions allowed by law.

For instance, we may not be able to give you access to information if:

- giving access would have an unreasonable impact on the privacy of other individuals;
- it would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations;
- it would reveal evaluative information generated within Federation in connection with a commercially sensitive decision making process;
- denying access is required or authorised by law; or
- relates to existing or anticipated legal proceedings and would not be accessible by the process of discovery in those proceedings.

We will take all reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and up to date. To ensure your personal information is accurate, please notify us of any errors or changes to your personal information and we will take appropriate steps to update or correct such information in our possession.

Storage and security

We will take all reasonable precautions to safeguard your information from loss, misuse, unauthorised access, modification, disclosure or destruction. We may store your files electronically. We implement a range of physical and electronic security measures to protect the personal information that we hold, including the use of password encryptions, firewalls, and other technological safeguards. Identification and password security also applies to online access of personal information.

You should keep in mind that no internet transmission is ever completely secure or error-free. In particular, e-mails sent to or from this website may not be secure.

Links to other websites

This website may contain links or references to other websites to which this Privacy Policy may not apply. You should check their own privacy policies before providing your personal information.

Notifiable Data Breaches scheme

In the event of any loss or unauthorised access or disclosure of your personal information that is likely to result in serious harm to you, we will:

- investigate; and
- notify you and the Australian Information Commissioner as soon as practicable,

in accordance with the Act.

Complaints

If you have any questions or concerns about our collection, use or disclosure of personal information, or if you believe we have not complied with this Privacy Policy or the Act, please contact us as set out below. Our Privacy Officer will investigate the complaint and determine whether a breach has occurred and what action, if any, to take.

Federation will take any privacy complaint seriously and will aim to resolve any such complaint in a timely and efficient manner, and our target response time is 30 days.

Federation expects our procedures will deal fairly and promptly with your complaint. However, if you remain dissatisfied, you can also make a formal complaint with the Officer of the Australian Information Commissioner (which is the regulator responsible for privacy in Australia):

Office of the Australian Information Commissioner (OAIC)

Complaints must be made in writing

 1300 363 992

 Director of Compliance
Office of the Australian
Information Commissioner
GPO Box 5218
Sydney NSW 2001

 www.oaic.gov.au

How to contact us

If you wish to exercise your right to opt-out of receiving our marketing materials, or you have any questions or concerns about this Privacy Policy or our information practices (including whether and what type of health information we hold about you), please contact us by:

- calling us on +61 2 8650 4500;
- e-mailing us at contact@federationam.com; or
- writing to us at Suite 30.04 Chifley Tower, 2 Chifley Square, SYDNEY NSW 2000.

Changes to this Privacy Policy

Our Privacy Policy may change from time to time as updated on this website. Before providing us with personal information, please check this Policy on our website for any changes.

This Privacy Policy was last updated November 2019.