

PRIVACY STATEMENT

Approved by the Board: November 2022

OUR COMMITMENT TO PRIVACY

This Privacy Policy relates to Excelsius Asset Management Pty Ltd (Excelsius Asset) and its related bodies corporate. Reference to Excelsius Asset includes its related entities that collect information from individuals.

Excelsius Asset recognises an individual's right to privacy, and understands the protection and confidentiality of your personal information is important to you.

Excelsius Asset has practices in place to comply with the 13 Australian Privacy Principles set out in the Privacy Act 1998. These principles govern how organisations handle personal information. 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.

THE KINDS OF PERSONAL INFORMATION WE COLLECT

Personal information is Information, or an opinion about an identified, or reasonably identifiable, individual.

The type of personal information Excelsius Asset 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.

We also collect some information from you when you use the website of Excelsius Finance Corporation Pty Ltd, a related company who provides administrative support to us. Your use of the website will determine the amount and type of information which we collect about you. Some of this information will not be personal information because it will not reveal your identity.

The only personal information which we collect about you when you use the website is what you tell us about yourself, for example, by completing an online form or information you provide to us when you send us an email. We will record your email address if you send us an email.

COOKIES

We may use temporary (session) cookies or permanent cookies when you access the web site. This allows us to recognise your browser and track the web pages you have visited. We do not link this information back to your identity or other information that you have provided to us. We do not store any information that identifies you inside cookies. You can switch off cookies by adjusting the settings on your web browser.

COLLECTION OF ANONYMOUS INFORMATION

Excelsius Asset may track usage patterns on our website on an anonymous basis. Your identity cannot be reasonably ascertained from this information. When you visit our website, a web server will record your visit and specifically certain information including information in relation to your operating and the pages you have visited.

HOW WE HOLD YOUR PERSONAL INFORMATION

We may hold your personal information in either electronic or hard copy form. If you provide information to us electronically, we retain this information in our computer systems and databases. This includes computer software programs, internet servers, and hosted internet solutions provided by third parties. If you provide information to us in hard copy (paper), this information is normally retained in our files and a copy is made to our electronic files.

PERSONAL INFORMATION SECURITY

Excelsius Asset 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 Excelsius Asset takes reasonable steps, we cannot guarantee the security of information you provide to us via our website or that we make accessible to you via the secure investor site. No personal data is stored on our public website.

HOW DOES EXCELSIUS ASSET COLLECT PERSONAL INFORMATION?

Personal information from investors may be collected by us for the primary purpose of providing investors with an investment in our schemes. There are also a number of related purposes for which your personal information may be collected and these are to process your application, administer and manage your investment, and comply with Australian taxation laws, the Corporations Act, the Anti-Money Laundering and Counter-Terrorism Financing Act (AML/CFT Act) and other laws and regulations. In addition, we may collect personal information about individuals who are not clients of Excelsius Asset e.g., business contact details of a company representative with whom we deal.

WHY WE NEED YOUR PERSONAL INFORMATION

The personal information we collect may be used for the purposes for which it was collected and related purposes, including to:

- verify your identity;
- help us to administer and improve our products and services;
- manage our relationships with you or our clients;
- provide you or our clients with information about our products, services, the markets;
- and developments that may interest you or them, and
- facilitate our internal business operations, including to fulfil our legal requirements.

Excelsius Asset 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 Excelsius Asset are authorised. You may also authorise us to disclose information to another person nominated by you. Your express consent is required.

DIRECT MARKETING

We may send you direct marketing communications and information about products and services offered by us via email, or regular mail. If you have indicated a preference for a method of communication, we will endeavour to use that method wherever practical to do so. You may opt out of receiving marketing communications at any time by responding via the channel in which you received the marketing communication, or by contacting us (see contact information below). If you have provided us with your email address, we may send you emails relating to our services, or other industry specific information. You can unsubscribe from emails by clicking the unsubscribe link on the footer of the email communication you have received.

We do not provide your personal information to any other organisations for the purposes of direct marketing.

TO WHOM MAY WE DISCLOSE YOUR PERSONAL INFORMATION?

We may disclose personal information for the purposes for which it was collected, and also:

- to any third-party service provider engaged to provide custody, reporting, administration, technology, auditing, registry, mailing or printing services in relation to your investment or a product or service provided by us;
- to the Australian Tax Office and other Government or regulatory body, when and to the extent required or by law;
- to any professional advisers (including legal and accounting firms, auditors, consultants and other advisers);
- within Excelsius Asset and its related companies;
- subject to our professional obligations, as permitted under the National Privacy Principles; and
- where you have consented to such disclosure, or as required or authorised by law.

We may disclose personal information to overseas recipients in order to provide our financial services. Before disclosing any personal information to an overseas recipient, we will take reasonable steps to ensure the overseas recipient complies with the Privacy Act or is bound by a substantially similar privacy regime or you otherwise consent to the overseas disclosure or the disclosure is required to be authorised by law.

ACCESSING OR CORRECTING YOUR PERSONAL INFORMATION

You may contact us to request access to the personal information we hold about you at any time. You may also ask us to correct information about you that you may believe is inaccurate, incomplete or out of date.

We will need to verify your identity before giving you access or correcting your information.

In certain circumstances, Excelsius Asset may not be able to correct or provide you with access to your information. In these circumstances, we will write to you to explain and provide the reasons why. Excelsius Asset takes all reasonable precautions to ensure that the personal information we collect, use, and disclose is accurate, complete and updated. However, we recommend that you advise us if there are any errors in your personal information and that you update us on any changes to your personal information such as change of name or address.



COMPLAINT HANDLING PROCESS

If a complaint remains unresolved, you may apply to the Office of the Australian Information Commissioner (OAIC) to have the complaint heard and determined. The Commissioner may be contacted on the privacy hotline: 1300 363 992. When we write to you about our decision, we will explain how you may access an external dispute resolution scheme or make a complaint to the OAIC.

NEED TO CONTACT US?

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

Excelsius Asset Management Pty Ltd
Level 2,
428 Little Collins Street
Melbourne Victoria 3000.

You can call the Excelsius office on 03 9070 1122 to discuss our privacy policy and how we deal with your personal information.