

Privacy Policy – DCP Syndication Pty Ltd

This privacy policy (**Policy**) applies to personal information collected by DCP Syndication Pty Ltd ABN 55 129 528 301 and its related bodies corporate (together, DCP, 'we', 'us' or 'our'). The Policy outlines how we collect, hold, use and disclose your personal information in accordance with the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles.

Collection of personal information

We only collect personal information that is necessary for what we do. Personal information is information or an 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.

Sensitive information is personal information that includes information relating to your racial or ethnic origin, political opinions, membership of a political organisation, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record or health information. We will only collect sensitive information where reasonably necessary for one or more of our functions or activities and with your consent, or where required or authorised by law.

The type of personal information we may collect and hold from you includes the following:

- Identity and contact information, including your name, address, e-mail address, phone number and date of birth.
- Financial and transaction information, including your bank account details, investment information and transaction history.
- Identification and verification information, including your driver licence, passport or other information required to verify your identity and assess compliance risks (including beneficial ownership information).
- Investor and account information, including information collected through the investor portal, such as application data, account activity and saved forms.
- Digital and usage data, including IP address, device information and interactions with our website or investor portal.
- Other information reasonably required to provide our services or to comply with legal obligations.

How we collect your information

We collect personal information directly from you where reasonable and practicable. We may also collect personal information about you from third parties, including related companies, your adviser, public sources and service providers. Where reasonable, we will make you aware when we collect personal information from third parties and the reasons for doing so.

Some information we request from you may be mandatory. If you do not provide this information, we may not be able to verify your identity, provide our services, process your application or comply with our legal obligations.

We store personal information in physical and electronic records, including at our premises and with our service providers. This may include storage or processing via third party platforms used to operate our investor portal. We take reasonable steps to protect the security and integrity of personal information. We also keep records of our interactions with you (including by telephone, email and online) and your transaction history.

We may utilise cookies and similar technologies to improve the functionality of our website and investor portal and to understand how users interact with our services. You can configure your browser to refuse cookies, although this may affect functionality.

How we may use and disclose your personal information

We may use and disclose your personal information for purposes including:

- the verification of your identity;

- the processing of applications and withdrawals (either by us or you), including to communicate with you concerning such applications or withdrawals;
- the administration and management of our products and services, including monitoring, auditing and evaluating those products and services;
- the improvement of our products or services;
- the maintenance and development of our services, products, business systems and infrastructure;
- marketing and promotional activities by us and our related bodies corporate;
- providing customer support, including handling customer enquiries and complaints;
- complying with applicable laws and regulatory obligations, including obligations under the AML/CTF Act;
- disclosing information to third parties in connection with our business and operations;
- operating and supporting our investor portal and associated systems;

We may also use or disclose your personal information without your consent:

- where we use or disclose it for a purpose related to the primary purposes of collection and you would reasonably expect such disclosure;
- if we reasonably believe that the use or disclosure is necessary to lessen or prevent a serious threat to an individual's life, health or safety or to public health or safety;
- if we reasonably suspect that unlawful activity has been, or is being, engaged in; or
- if it is required or authorised by law.

In the event we propose to use or disclose such personal information other than for any of the reasons set out above, we will first seek your consent prior to such disclosure or use.

If you have received communications from us and you no longer wish to receive those sorts of communications, you should contact us by telephone at +61 438 619 692 or use any unsubscribe mechanism provided in the communication, and we will ensure the relevant communication ceases.

The types of organisations to which we may disclose your personal information

We may disclose your personal information to organisations outside of DCP, including to:

- offshore service providers; and
- contractors and agents.

Your personal information is disclosed to these organisations only in relation to the services we provide to you or for a purpose permitted by this Policy.

Cross border disclosure

DCP may disclose your personal information to entities or persons outside of Australia. To the extent that we need to disclose your personal information to an overseas recipient, you acknowledge and consent to such disclosure, but only for a purpose directly connected with the services provided by us or for a purpose otherwise permitted by this Policy. Where we disclose personal information to overseas recipients, we take reasonable steps to ensure that the recipient handles the information in accordance with the Australian Privacy Principles, unless an exception applies.

Data quality and security

We have taken reasonable steps to:

- make sure that the personal information we collect, use or disclose is accurate, complete and up to date;
- protect your personal information from misuse, loss, unauthorised access, modification or disclosure both physically and through computer security methods; and
- destroy or permanently de-identify personal information if it is no longer needed for any purpose for which it may be used or disclosed, unless we are required or authorised by law to retain it.

We retain personal information for as long as necessary to fulfil the purposes for which it was collected and to comply with legal obligations, including minimum retention periods required under the AML/CTF Act and other applicable laws.

Access to and correction of your personal information

You may request access to, or correction or deletion of the personal information we hold about you, subject to where we are required or permitted by law to retain that information. If you would like to access or correct your personal information, please contact us using the details below. We will respond to requests for access or correction within a reasonable period (generally within 30 days). We may charge a reasonable fee (where permitted by law) for providing access to your information, but will not charge a fee for making a request.

Questions and complaints

If you have a question or complaint about how we have handled your personal information, please contact us using the contact details below. We will acknowledge receipt of your complaint as soon as reasonably practicable and endeavour to investigate and resolve your complaint within 30 days.

If you are not satisfied with our response, you may lodge a complaint with the Office of the Australian Information Commissioner.

Governing law

This Policy is governed by the laws in force in Queensland, Australia. You agree to submit to the exclusive jurisdiction of the courts of that jurisdiction.

Consent

By using our website, investor portal, or entering into an agreement that refers to this Policy, you acknowledge that you have read and understood this Policy and consent to the handling of your personal information as described. We reserve the right to modify this Policy as our business needs require. We will post such changes on our website, after which, your continued use of the website or dealings with us will constitute acceptance of the updated Policy to the extent permitted by law.

Contacting us

If you need more information, want to access or update your personal information or you have a privacy concern, or if you wish to contact us regarding our handling of your personal information or any of the matters covered in this Policy, please contact the us by email, phone or mail using the following details:

Email: Charmaine Pamiloza

Phone: +61 402 817 795

You can also contact the Office of the Australian Information Commissioner if your complaint is about your privacy.

Office of the Australian Information Commissioner

Visit: oaic.gov.au

Email: enquiries@oaic.gov.au

Phone: 1300 363 992

Mail: GPO Box 5288, Sydney NSW 2001