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## Privacy Policy

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### Rights to privacy

Paragon Funds Management Ltd ('Paragon', 'we' or 'our') understands the importance of protecting an individual's right to privacy.

This privacy policy sets out how we aim to protect the privacy of your personal information, your rights in relation to your personal information managed by us and the way we collect, hold, use, disclose and otherwise manage your personal information.

In handling your personal information, we comply with the Privacy Act 1988 (Cth) ('Privacy Act') and the Australian Privacy Principles ('APPs') under the Privacy Act.

We regularly review our practices and procedures regarding how we collect, hold, use, disclose and otherwise manage personal information. As a result, this policy may be updated from time to time. Where we update this policy we will make the updated policy available, including on our website.

### What kinds of personal information does Paragon collect?

For the purposes of the Privacy Act, personal information is information or an opinion, whether true or not and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

The kinds of personal information that we collect will vary depending on the type of dealings we have with you and how you interact with us.

Where you invest in a fund or other product of Paragon, the kinds of personal information that we may collect include your name, date of birth, address, telephone number, e-mail address, driver's licence details, passport details, tax file number, bank account details, and details regarding your financial or investment arrangements and your financial or accounting advisors.

In some circumstances, we may also hold other kinds of personal information provided by you, for example where we are required to collect and hold particular kinds of information under Australian anti-money laundering legislation for identification and other purposes.

We will not generally collect or hold sensitive information about you, unless we are required to do so by law. Sensitive information includes information about your race, political or religious beliefs, sexual preferences, criminal convictions, membership of professional or trade associations or unions or health information.

We may also collect statistical information relating to your use of our website or other online services, including:

- your server address;
- your top level domain name (for example .com, .gov, .au, .uk etc);
- the pages you accessed and documents downloaded;
- the website you visited immediately prior to accessing this website; and
- the type of browser you are using.

We will not normally be able to identify you from such statistical information.

### How does Paragon collect personal information?

There are a number of circumstances in which Paragon will collect personal information from you. For example, Paragon may collect personal information where you apply to invest in our funds or other products, as part of our administration of any investment you make in our funds or other products, where you request information from Paragon regarding us or our funds or other products or where you submit information to us via our website or other online services.

Generally, we will collect personal information directly from you.

However there may be other occasions when we collect your personal information from other sources, such as from a publicly maintained record or from an information services provider. For example, where you apply to invest in our funds or other products, we may collect personal information regarding you from any registry services provider appointed in respect of the relevant fund or product.

### Why do we need your personal information?

We collect, hold, use and disclose your personal information for purposes relating to our funds management business and operations, including for the purposes of:

- (a) processing your application for investment in our funds or other products and establishing your investment in our funds or products;
- (b) administering any investment you have with us in our funds or other products, including communicating with you about your investment;
- (c) providing access to our website and other related online services;
- (d) responding to queries you submit to us;
- (e) facilitating our internal business operations;
- (f) providing you with information about our products or services that may be of interest to you;
- (g) advising the Australian Tax Office and other governmental authorities of your tax file number;
- (h) making deposits of distributions or withdrawals of your investment to your nominated bank account;
- (i) accounting, billing and other internal administrative purposes;
- (j) complying with our legal requirements under any applicable laws, including the anti-money laundering legislation; and
- (k) complying with any other legal requirements which we are subject to.

You are under no obligation to provide your personal information to us. However, without receiving certain information from you, we may not be able to provide our services to you and may not be able to process any application by you for investment in our funds or other products.

In addition to the purposes set out above, we may collect, use and disclose your personal information to inform you of products, services or offers of Paragon which may be of interest to you. Where you are an investor in a fund or other product of Paragon, this may include providing you with direct marketing information regarding the other funds or products of Paragon or its related companies.

If you do not want to receive this information or do not want us to use or disclose your personal information for direct marketing purposes, you can opt out by letting us know that you wish to opt out of receiving this information and/or Paragon using or disclosing your personal information for direct marketing purposes.

### Who do we disclose your personal information to?

We disclose your personal information for the purpose for which we collect it. That is, generally, we will only disclose your personal information for a purpose related to the provision of funds management services or any related purposes.

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

- (a) your financial advisers or other professional advisers;
- (b) related companies of Paragon (such as subsidiaries or holding companies of Paragon);
- (c) any registry service provider or other similar service provider appointed by us in relation to our funds or other products;
- (d) any other third party service provider which we may engage to provide custody, administration, technology, auditing, mailing, printing or other services;
- (e) Government authorities where required to by law; and
- (f) our professional advisers (including legal and accounting firms, auditors, consultants and other advisers).

We may disclose personal information to overseas recipients, for example to data storage providers located overseas.

While it is not practicable to list every country in which such recipients may be located, recipients of such disclosures are likely to be located in the UK, the USA, South Africa, Singapore and the Philippines.

#### Security of your personal information

We may hold your personal information in both hard copy and electronic forms.

We will take reasonable steps to ensure that the personal information we hold is protected against misuse, loss, unauthorised access, modification or disclosure.

Personal information is held on secure servers or in storage located in controlled, access restricted environments. Our employees are required to maintain the confidentiality of any personal information held by us.

Personal information may also, in certain circumstances, be held on behalf of Paragon in hard copy or electronic forms by Paragon's service providers (such as offsite document storage providers, electronic data storage providers or registry service providers). Paragon enters into agreements with such service providers which impose confidentiality and privacy obligations on the service provider.

### Can you access or correct the personal information that we hold about you?

Paragon takes steps reasonable in the circumstances to ensure that the personal information it collects, holds, uses and discloses about an individual is accurate, complete, up-to-date, relevant and not misleading.

Under the Privacy Act, you have a right to request access to or correction of your personal information that is collected and held by us.

If at any time you would like to request access to or correction of the personal information we hold about you, or you would like more information on our approach to privacy, please let us know.

To obtain access to or correction of your personal information, we may request that you provide us with proof of your identity. This is necessary to ensure that personal information is provided only to the correct individuals and that the privacy of others is protected.

Upon receiving a request for access to or correction of personal information we will review the request, make a decision regarding the request and notify you of that decision.

We will take all reasonable steps to notify you of our decision and (if applicable) provide the relevant access or make the relevant correction within 30 days from the date of your request. In less complex cases, we will attempt to notify you of our decision and (if applicable) provide the relevant access or make the relevant correction within 14 days from the date of your request.

In some circumstances, a fee may be charged for the cost of providing you with access to your personal information (for example where providing access requires a detailed retrieval of your personal information). Such a fee will not exceed the cost to Paragon of providing access.

### How to contact us

For further information or enquiries regarding your personal information or to request access to or correction of personal information or to make a privacy complaint, please contact Paragon using any of the following contact details:

**eml.** [client.services@paragonfunds.com.au](mailto:client.services@paragonfunds.com.au),

**tel.** (03) 9652 2500; or

Level 19, 80 Collins St, Melbourne VIC 3000

### Privacy complaints

If you believe that we have not dealt with your personal information in a manner that complies with the Privacy Act or the APPs, you can make a privacy complaint to us.

Please direct all privacy complaints to Paragon in writing using the contact details set out above.

#### At all times, privacy complaints:

- will be treated seriously;
- will be dealt with promptly;
- will be dealt with in a confidential manner; and
- will not affect your existing obligations or affect the commercial arrangements between you and us.

Upon receipt of your complaint, we will commence an investigation into your complaint.

You will be informed of the outcome of your complaint following the completion of the investigation.

In the event you are dissatisfied with the outcome of your complaint, you may refer the complaint to the Federal Office of the Privacy Commissioner.