Metacap Developments Pty Ltd
PRIVACY POLICY

OUR COMMITMENT TO PROTECT YOUR PRIVACY

Metacap Developments Pty Ltd ACN 113 465 366, Authorised Representative Number 001273770 (Metacap), its related businesses (collectively known as "Metacap) seeks to provide the best possible service to its customers by providing the best possible range of financial products and services. In this Privacy Policy references to 'we', 'us' and 'our' refer to Metacap and to the AMAL Trustees Pty Ltd ACN 609 737 064, AFSL 483459, the trustee of the managed investment schemes of which Metacap is the investment manager.

We understand how important it is to protect your personal information. This document sets out our Privacy Policy commitment in respect of personal information that you may provide to us.

We recognise that any personal information we collect about you will only be used for the purposes indicated in our policy, where we have your consent to do so, or as otherwise required or authorised by law. It is important to us that you are confident that any personal information we collect from you or is received by us will be treated with appropriate respect ensuring protection of your personal information.

Our commitment in respect of personal information is to abide by the Privacy Act 1988 (Cth) and any other relevant law.

PERSONAL INFORMATION

When we refer to personal information we mean information or an opinion about an individual, from which that individual is, or may reasonably be, identified.

This information may include the individual's name, date of birth, driver's licence number, marital status, number and age of your dependants, phone number, email address, address, nationality and employment history.

Personal information also includes sensitive information. Sensitive information includes information about an individual's health, race or ethnic background, their religion, trade union membership, political opinion, sexual preference or criminal record. Generally we will not collect such information about an individual, unless such information is required in order to process an application for a product or service provided by us. We will only collect sensitive information about an individual with that person's consent.
INFORMATION ABOUT NON-INDIVIDUAL CUSTOMERS

If our customer is an entity other than an individual, for example a company or a trust, we may collect information about that entity. This information may include that entity’s name and address, registration details, details of individuals involved with that entity and financial information about that entity.

In this policy, a reference to Information includes personal information (including sensitive information) about individuals as well as information about non-individual customers.

WHY WE COLLECT YOUR INFORMATION

We collect and receive Information about you in order to conduct our business and to provide our services, including offering units in the managed investment schemes we offer. We also collect Information about you to enable to directly marketing of our products and services. If you apply for employment with us we may also collect personal information about you.

HOW DO WE COLLECT YOUR INFORMATION?

Information may be collected by us in a number of circumstances, including when you:

- apply to become a customer of Metacap or apply for one of our products or services;
- attend an event hosted by us; or
- apply for employment with us;

Where reasonable and practical we will collect Information about you directly from you or one of your representatives or from publically available information. However, we will also collect Information about you from third parties, such as a partner or spouse who contacts us on your behalf, from our contractors who supply services to us, through our brokers and introducers), from advisers such as accountants or lawyers or other organisations authorised by you.

If you do not provide the Information requested by us, we may not be able to provide you with our services.

If you provide Information to us about another individual or about an entity with which you are associated, you must ensure that you are entitled to disclose that Information to us and that, without us taking any further steps required by privacy laws or by our general duty of confidentiality, we may collect, use and disclose such Information for the purposes described in this Privacy Policy. For example, you should take reasonable steps to ensure any individual concerned is aware of the various matters detailed in this Privacy Policy. Any such individual or entity must also provide the consents set out in this Privacy Policy in respect of how we will deal with their Information.

HOW DO WE USE YOUR INFORMATION?

We use Information provided to us for the purpose for which it has been provided, for reasonably related secondary purposes, any other purpose you have consented to and any other purpose permitted under the Privacy Act. This may include using your Information for the following purposes:

- to provide you with the products or services you requested;
- to verify your identity;
to assess, process and manage your application for a product or service offered by us, including to verify your details and assess our risk;
- to assess, process and manage your application for employment; or
- for complaints handling or data analytics purposes.

TO WHOM WILL WE DISCLOSE YOUR INFORMATION?

To enable us to maintain a successful business relationship with you, we may disclose Information about you to:

- organisations that provide products or services used or marketed by us, including, funders, lenders, valuers, trustee companies, financial institutions, surveyors, and debt collectors;
- your employer/s or referees, your professional advisors, your bank and any other organisation that may have or is considering having an interest in our business or a product provided by us;
- companies and contractors who we retain to provide services for us, such as IT contractors, call centres, stationery printing houses, mail houses, storage facilities, lawyers, accountants and auditors, who will need to have access to your Information to provide those services;
- people considering acquiring an interest in our business or assets;
- other individuals or companies authorised by you

By providing us with your Information, you consent to us disclosing your Information to such entities without obtaining your consent on a case by case basis.

Sometimes we are required or authorised by Australian law to disclose your personal information. Circumstances in which we may disclose your personal information would be to a Court, Tribunal or law enforcement agency in response to a request or in response to a subpoena or to the Australian Taxation Office. From time to time, we may also be required to provide Information about you to a foreign law enforcement agency or foreign regulator.

Some of our third party service providers (including our information technology service providers) may be located in countries outside of Australia. Although our contracts with third parties generally include an obligation for them to comply with Australian privacy law and our Privacy Policy, some of our related bodies corporate, branches and third party service providers are located in countries that do not have laws that provide the same level of protection as the laws of Australia.

We may also use cloud storage and IT servers that are located offshore.

DIRECT MARKETING

From time to time we may use your Information to provide you with current information about products and services, special offers you may find of interest, changes to our organisation, or new products or services being offered by us or any company we are associated with. By providing us with your Information, you consent to us using your Information to contact you on an ongoing basis for this purpose, including by mail, email, SMS, social media and telephone.

If you do not wish to receive marketing information, you may at any time decline to receive such information by contacting our Privacy Officer on the contact details below. We will not charge you for giving effect to your request and will take all reasonable steps to meet your request at the earliest possible opportunity.
UPDATING YOUR INFORMATION

It is important to our relationship that the Information we hold about you is accurate and up to date. During the course of our relationship with you we will ask you to inform us if any of your Information has changed.

If you wish to make any changes to your Information that we hold about you, or if you think any such Information we hold about you is incorrect, you should contact us to have it updated. We will generally rely on you to assist us in informing us if the Information we hold about you is inaccurate or incomplete.

ACCESS TO YOUR INFORMATION (THIS SECTION APPLIES ONLY TO 'PERSONAL INFORMATION' ABOUT INDIVIDUALS)

We will provide you with access to the personal information we hold about you, subject to limited exceptions in the Privacy Act as outlined below. You may request access to any of the personal information we hold about you, at any time.

To access personal information that we hold about you, use the contact details specified below. We may charge a fee for our reasonable costs in retrieving and supplying the information to you.

DENIED ACCESS TO PERSONAL INFORMATION (THIS SECTION APPLIES ONLY TO 'PERSONAL INFORMATION' ABOUT INDIVIDUALS)

There may be situations where we are not required to provide you with access to your personal information. For example, such a situation would be information relating to an existing or anticipated legal proceeding with you, or if your request is vexatious. An explanation will be provided to you if we deny you access to your personal information we hold.

BUSINESS WITHOUT IDENTIFYING YOU

In most circumstances it will be necessary for us to identify you in order to successfully do business with you, however, where, it is lawful and practicable to do so, we will offer you the opportunity of doing business with us without providing us with Information. Such a situation would be where you make general inquiries about interest rates or current promotional offers.

HOW SAFE AND SECURE IS YOUR INFORMATION THAT WE HOLD?

We will take reasonable steps to protect your Information, by storing it in a secure environment, and when the Information is no longer needed for any purpose for which the Information may be used or disclosed, it will be destroyed or permanently de-identified.

We will also take reasonable steps to protect any Information we hold about you from misuse, loss and unauthorised access, modification or disclosure.
FURTHER INFORMATION AND COMPLAINTS

You may request further information about the way we manage your personal information or lodge a complaint by contacting our Privacy Officer(s) on the contact details below:

CONTACT DETAILS

You can contact us by calling us on (07) 3206 1562 or by writing to The Privacy Officer, Metacap Developments Pty Ltd at njimenez@metacapdevelopments.com

Alternatively, you can email us at admin2@metacapdevelopments.com

We will deal with the complaint by investigating the complaint, and providing a response to the complainant within 15 business days, provided that we have all necessary information and have completed any investigation required. In cases where further information, assessment or investigation is required, we will seek to agree alternative time frames with you.

ALTERNATIVE FORMS OF OUR PRIVACY POLICY

If you would prefer to receive a copy of our Privacy Policy, including the ‘Notifiable Matters’ in an alternative form (such as in hard copy or via email) please contact us on the phone number or email address provided under the section titled ‘Contact Details’ above. We will be pleased to comply with your request.

CHANGE IN OUR PRIVACY POLICY

We are constantly reviewing all of our policies and attempt to keep up to date with market expectations. Technology is constantly changing, as is the law and market place practices.

As a consequence we may change this Privacy Policy from time to time or as the need arises.

This Privacy Policy was last updated in December 2018.