



Theta Asset Group Privacy Statement

An outline of our Policy

The Theta Asset Group is bound by the Australian Privacy Principles (**APPs**) in the *Privacy Act 1988*. This Privacy Statement provides an outline of how the Theta Asset Group deal with the personal information of individuals. It was issued in March 2014 and takes into account the regulatory changes introduced by the Office of the Australian Information Commissioner under the *Privacy Amendment (Enhancing Privacy Protection) Act 2012*.

A copy of the complete Privacy Policy for the Theta Asset Group can be obtained by calling us on +61 2 8012 0638, during Sydney office hours of 9am–5pm, Monday to Friday (excluding public holidays) and requesting a copy from us.

Our practices when handling Personal Information

Anonymity and Pseudonymity

When contacting a company of the Theta Asset Group, you generally have the right to remain anonymous (that is, you don't have to give us your name) or you can use a pseudonym (a fictitious name) to protect your identity. Where you contact us and you choose not to identify yourself, we may be unable to provide you with some services or information in connection with your account.

Collection of Information

The Theta Asset Group only collect personal information that is reasonably necessary for, or directly related to provision of the services we offer. This is to ensure the proper probity of counterparties for the issuance of our Funds; for individuals investing with us and the on-going management of the Funds; or where the information is required under relevant laws or regulations.

We normally collect personal information directly from the individual or their authorised representative(s). Sometimes, we collect personal information from a third party, a publicly available source or by other lawful means, but only if:

- We have consent from the individual, or the individual would reasonably expect us to collect their personal information; or
- If it is necessary for a specific purpose such as executing a function or activity in connection with your investment or business dealings with us; or
- Where we are permitted, or required to, by lawful authority.

The Theta Asset Group do not collect any personally sensitive information.

Dealing with Unsolicited Information

Disclosure of unsolicited information we hold may occur but only where we are required to under the law or where it is permitted by law. The Theta Asset Group sometimes receives unsolicited information from individuals or other sources. In this situation we will take reasonably practicable steps to de-identify or destroy the information, or to protect the information from misuse or unauthorised disclosure.

Notification of Collection

The Theta Asset Group takes all reasonable and practicable steps to notify you and to ensure you are aware of certain matters, at or before the time of collection, or as soon as practicable afterwards. Where an application or other form is used to collect personal information, it will generally contain a collection notice (or reference to where a collection notice can be obtained) and individuals may be asked to confirm they have reviewed that notice.

Use and disclosure

The Theta Asset Group takes reasonable steps to confirm that third parties with whom we deal, are also compliant with the Privacy Act. In executing services, activities and functions, where necessary, personal information may be disclosed to third parties and/or related bodies corporate currently located in Australia.

Theta Asset Group does not sell personal information. We only use or disclose personal information where it is reasonably necessary for, or directly related to, one or more of our functions or activities; or because it is required under relevant law or regulation. Personal information will only be given to other organisations where one or more of the following situations applies:

- We have consent from the individual;
- The individual would reasonably expect, or has been advised that personal information may be used or disclosed;
- If the use or disclosure is required by lawful authority; or
- If the use or disclosure relates to one or more *Permitted General Situations* under the *Privacy Act 1988* including (but not limited to) a serious and imminent threat to somebody's life or health, or if it is reasonably necessary for law enforcement.

Direct Marketing

The Theta Asset Group will not use the personal information we hold to provide you with information about relevant products and services.

Data Quality and Security

We take reasonable steps to ensure information we hold about you is relevant, accurate, up-to-date and complete and we take all reasonable and practicable steps to protect personal information we hold against loss, unauthorised access, misuse, modification, disclosure or interference. When we no longer need the personal information we hold about you, we will take all reasonable and practicable steps to de-identify or destroy the information in a secure manner. Where that is not practicable, we will protect information from misuse or unauthorised disclosure by putting the information beyond reasonable use.

YOUR RIGHTS – ACCESS AND CORRECTION

You have the right to access the personal information we hold about you. The Theta Asset Group encourages you to ask us to correct any personal information we hold that is out-of-date, incorrect, incomplete or misleading. To protect your privacy, we strongly urge you not to provide any personal information that is not required or that we do not ask for. If you have provided us with your email address for communications, you can delete it at any time, but if you do so, we may be unable to provide you with some services or information in connection with your account.

Contact us

If you have any questions or if you would like to give us feedback or make a complaint about how we handle your information, contact our Privacy Officer.

Phone: +61 2 8012 0638
Email: invest@thetaasset.com.au; or
Postal address: Privacy Officer,
Theta Asset Group,
PO Box Q423,
Sydney NSW 1230.

Alternatively, you may wish to refer to the Office of the Australian Information Commissioner (OAIC) for more detailed information about the APPs or by viewing the website at www.oaic.gov.au.

Theta Asset may make changes to the Privacy Statement from time to time, without notice to any person or third party. An updated summary of the Privacy Statement will be available through the company websites of the Theta Asset Group.