

Privacy Policy

The following statement explains the policy of Pelathon Funds Management Limited relating to the collection, storage and use of personal information.

The purpose of this policy is to assure anyone who does business with Pelathon Funds Management that Pelathon Funds Management will comply with both the letter and spirit of the Privacy Act 1988.

Compliance with Privacy Legislation

Pelathon Funds Management complies with the National Privacy Principles contained in the Privacy Act 1988.

Collection of Personal Information

Personal information is defined as information or an opinion that can identify a person. The type of personal information that Pelathon Funds Management collects from its customers will depend upon what dealings customers may have with Pelathon Funds Management.

The type of information we may collect and hold includes information about:

- Investors in our investment vehicles (for example, when establishing accounts and to meet any legislative requirements such as Anti Money Laundering), including, without limitation, names, addresses, contact details, bank account details and tax file numbers, etc.
- Tenants (for example, when entering into a lease with Pelathon Funds Management)
- Suppliers and purchasers (for example, when establishing records and systems to enable payment for goods)
- Employees (for example, for the purposes of employment)
- Contractors (for example, when establishing records and systems to enable payment for services), and
- Joint venture partners and other people who provide or who we provide goods and services to and who we have contractual relationships with.

Use and Disclosure of Personal Information

Pelathon Funds Management's policy is only to use or disclose personal information for the purpose which was either specified or reasonably apparent at the time when the information was collected. Pelathon Funds Management may also use or disclose the information collected for any other related purpose for which an investor or customer would reasonably expect it to be used. If Pelathon Funds Management wishes to use or disclose the personal information in other circumstances it would obtain the persons consent to do so.

Security of Personal Information

Pelathon Funds Management will take reasonable steps to protect personal information that it collects and reasonable steps to ensure that the information is accurate and up-to-date. Investor information is held on secure servers or in storage located in controlled environments. Pelathon Funds Management employees are required to maintain the confidentiality of any personal information held.

Sharing Information with Other Organisations

Pelathon Funds Management does not sell personal information to companies. The circumstances in which external organisations may be given access to Pelathon Funds Management investors' personal information include, but are not limited to:

- Investors in our investment vehicles (for example, when establishing accounts and to meet any legislative requirements such as Anti Money Laundering) including, without limitation, names, addresses, contact details, bank account details and tax file numbers, etc.
- to the Australian Securities and Investments Commission, AUSTRAC and to other government agencies as agreed to or required by law
- when Pelathon Funds Management's contractors and service providers are assisting Pelathon Funds Management in the operation of its business or to provide a service (for example, a company which helps maintain Pelathon Funds Management's computer systems or sends out Pelathon Funds Management's mail)
- to third party lenders and our insurers
- to anyone authorised by a provider of personal information, and
- if Pelathon Funds Management is required to provide the information by court proceedings.

Marketing

Pelathon Funds Management may send advertising mail to its investors where the advertising mail is related to the purpose for which the information was collected. If the investor no longer wishes to receive promotional information from Pelathon Funds Management, the investor should advise the Pelathon Funds Management

Privacy Officer. Normally Pelathon Funds Management's records would be amended within 30 days.

Cookies

A cookie is a small data file that may be placed on the computer of a web user (usually in the browser software folder) the first time a computer visits a web site which operates cookies. Cookies are necessary to facilitate on-line transactions and ensure security. If customers do not wish to receive any cookies, they should set their browser to refuse cookies. Pelathon Funds Management does not use cookies to keep personal profiles of its customers' use of the Pelathon Funds Management website at www.pelathon.com

Access to Personal Information

Investors are welcome to request details regarding what personal information Pelathon Funds Management may hold about them. To obtain the information, please contact the Pelathon Funds Management Privacy Officer. Pelathon Funds Management will require personal identification.

Changing Information

If an investor wishes to update personal information that may be inaccurate or out-of-date, they may write to the Pelathon Funds Management Privacy Officer.

Changes in the Future

Pelathon Funds Management reserves the right to change this Privacy Policy at any time. Pelathon Funds Management will notify any changes by posting an updated version of the policy on the Pelathon Funds Management website at www.Pelathon.com

Additional Information on Privacy

For further information about privacy issues and the protection of privacy, visit the Australian Federal Privacy Commissioner's website at www.privacy.gov.au

You can contact the Pelathon Funds Management Privacy Officer as follows:

Pelathon Management Group
Suite 1, 207 Ben Boyd Road
Neutral Bay, NSW 2089
Phone: 02 9098 9100
Email: info@pelathon.com