

Versailles Capital Privacy Policy

This is the Privacy Policy of Versailles Capital Pty Ltd ACN 628 328 647 (**we, us or our**). It applies to us when we provide promotional and investment services to various managed investment schemes which are branded “Versailles Capital” (**our products**) and when we maintain information on the shareholders in our company.

Your Privacy

Your privacy is important to us and we are committed to managing your personal information responsibly and in accordance with our legal obligations including the requirements of the *Privacy Act 1988* and the Australian Privacy Principles. These laws and principles regulate, among other things, the way we collect, use, disclose, keep secure and give you access to your personal information.

This Privacy Policy sets out the type of information we collect and how we collect, store, use and disclose your personal information. We recommend that you read it carefully.

You are not required to provide us with your personal information, but if you do not do so we may not be able to assist you in relation to our products or services.

If you apply for or accept any of our products or services or otherwise provide us with your personal information, you agree to your information being collected, held, used and disclosed as set out in this Privacy Policy. We may revise this Privacy Policy from time to time by placing the revised Privacy Policy on our website or otherwise notifying you of the change.

What kind of information do we collect?

In order to provide our products and services we may collect the following information:

- full name, date of birth, gender and contact details including telephone, address, e-mail and fax;
- a copy of your driver licence and/or passport or other identification documentation for the purpose of verifying identity and to ensure compliance with the *Anti-Money Laundering and Counter-Terrorism Financing Act (AML/CTF Act)* and/or other legislation and regulations regarding identification verification, and tax reporting and withholding;
- your tax file number (TFN) and bank account details;
- details about authorised signatories on your investments in our products;
- detailed contact information about your financial adviser; and
- copies of any relevant trust deeds, partnership agreements or constitutions, which may be relevant to comply with the *Anti-Money Laundering and Counter-Terrorism Financing Act*.

This information is required to facilitate an investment into our products and it may be provided to us or to the independent trustee or responsible entity of our products. It may, on occasion also be necessary to obtain other details, including information relating to powers of attorney or information for probate and estate administration.

How do we collect and hold personal information?

We may collect your personal information in various ways including by telephone, our website, from documents or correspondence and by email. Wherever practicable, we will collect information about you from you personally.

However, it may be necessary at times to collect information about you from other external sources, such as:

- a financial adviser or broker;
- authorised representatives, such as executors or administrators; and
- identification verification service providers.

If you use our website, our web server (i.e. the computers that house our website) has the capacity to collect the following types of information for statistical purposes:

- the number of users who visit the website;
- the number of pages viewed; and
- traffic patterns.

This is anonymous statistical data and no attempt is made to identify users or their browsing activities. This data is used only to evaluate our website performance and to improve the content we display to you.

Other information, such as browser type, may be included in a 'cookie' that is sent to your computer when you complete certain tasks on our website. A cookie contains bits of information that enables our servers to identify and interact efficiently with your computer. Cookies are designed to provide a better, more customised website experience, and to make it easier for you to use our website. You can configure your computer to accept or reject cookies.

All personal information we collect will be held securely and in accordance with this Privacy Policy. Your information is protected from unauthorised access through the use of secure passwords, user logins or other security procedures.

We take this opportunity to advise you that the Internet is an insecure medium and that, for your protection, you should maintain up to date anti-virus software whenever you access the internet.

For what do we use personal information?

Generally, we only use and disclose information for the purpose for which it was disclosed to us or related purposes which would reasonably be expected. Those purposes include:

- to enable us to provide information to the independent trustee and responsible entity of our products;
- to assist you establish or administer your investment in our products;
- for communication purposes which may include surveys and questionnaires;
- to comply with our record-keeping, reporting and tax obligations;

- to protect legal rights and comply with legal obligations;
- to prevent fraud and abuse;
- for quality assurance and training purposes;
- to enable us to provide information about new and existing products and services that will enhance our relationship with you. However, we do respect the right of individuals to ask us not to do this; and
- to handle any relevant enquiries or complaints.

We may be required by law to disclose personal information.

For instance, we may be required to provide details to:

- Australian Government regulators such as the Australian Securities and Investments Commission, the Australian Tax Office, the Australian Transaction Reports and Analysis Centre and to other regulatory or government entities;
- as required by a court order (including in Family Law matters); and
- other regulatory or governmental entities outside of Australia.

In order to meet the needs of our shareholders and the needs of investors in our products it may be necessary to release information or provide access to external service providers, for instance:

- to mail houses and software and information technology providers;
- to auditors, consultants and other professional advisers;
- to your financial adviser;
- to a legal personal representative, attorney or any other person who may be entitled to receive the proceeds from your shareholding in our company;
- to other financial institutions who hold an account in an investor's name, for example, where amounts have been transferred to or from that account; and
- to authorities investigating (or who could potentially investigate) alleged fraudulent or suspicious transactions.

Information about you or your dealings with us is not and will not be sold to any other company, individual, or group.

Can you access and amend your personal information?

You may request access to any personal information we hold about you. Generally, if it is incorrect, we will correct it at your request. Your right to access is subject to some exceptions allowed by law. We will notify you of the basis for any denial of access to your personal information.

Can you complain?

Yes. If you have a complaint about a breach of this Privacy Policy including the manner in which we have collected, held, used, disclosed, kept, or given people access to your personal information, then you may make a complaint to us using the contact details set out below. You will need to provide us with sufficient details regarding your complaint and any supporting evidence.

Your complaint will be referred to our Directors who will ensure the issue is investigated and they will determine the steps we will take to resolve your complaint. We may ask you to provide additional information.

We will notify you in writing of our determination, generally within 30 days. If you are not satisfied with our determination or you do not receive a response within 30 days, you can contact us to discuss your concerns and you can refer the complaint to the Office of the Australian Information Commissioner www.oaic.gov.au

Will your information be sent overseas?

Your information will be handled in accordance with Australian law. If that requires us to disclose information to overseas Government Agencies, and the like, then we will comply with our legal responsibilities.

Are copies of this Privacy Policy available?

Yes. A copy of our current Privacy Policy (this document) is available from us free of charge as follows:

- You can download a copy in document format from our website www.versaillescapital.com.au;
- You can request a copy be emailed to you by emailing your request to info@versaillescapital.com.au;
- You can telephone us and request a copy be emailed to you by calling 1300 631 002;
- You can write to us and request a copy be emailed to you. Our postal address is:
Versailles Capital Pty Ltd, Suite 805, 97 Pacific Highway, North Sydney NSW 2060

Any Questions?

If you have any further questions relating to this Privacy Policy, or concerns about the way in which we have handled your personal information, please do not hesitate to contact us by email, telephone or letter.