



H.B.U Investments Limited Privacy policy

This privacy policy covers H.B.U Investments Limited ACN 608 424 488 AFSL 482375 and its related companies, including H.B.U Funds Management Pty Ltd ACN 615 639 846 (**H.B.U, we, our**).

This privacy policy sets out how H.B.U aims to protect the privacy of your personal information, your rights in relation to your personal information managed by H.B.U and the way H.B.U will collect, hold, use, disclose and otherwise manage personal information about you.

H.B.U will regularly review and update our practices and procedures regarding the management of personal information. As a result, this policy may be updated from time to time. Where H.B.U updates this policy H.B.U will make the updated policy available, including on our website.

Kinds of personal information H.B.U collects

For the purposes of the Privacy Act 1988 (Cth), 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 H.B.U collects will vary depending the type and nature of H.B.U's dealings with you. For example, where you invest in a fund or other product of H.B.U, we may collect information such as your name, residential and business address, date of birth, contact details (such as email and phone numbers), tax file number, bank account details, tax and financial information, employment details, details regarding any investment you make in H.B.U's funds or other products and details regarding your financial or accounting advisors.

H.B.U may also collect other kinds of personal information about you, for example where H.B.U is required to collect certain kinds of personal information about you for H.B.U to undertake identification and verification processes in accordance with the *Anti-Money Laundering and Counter Terrorism Financing Act* or where HBU is required to collect personal information about you under any other relevant laws (including, for certain types of investors, the *Foreign Account Tax Compliance Act* (FATCA)).

H.B.U will not generally collect or hold sensitive information about you, unless H.B.U is 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

How H.B.U collects personal information

H.B.U may collect personal information about you in a range of circumstances, such as:

- (a) where you apply to invest in H.B.U's funds or other products;
- (b) as part of H.B.U's administration of any investment you make in H.B.U's funds or other products;
- (c) where you request information from H.B.U regarding H.B.U or H.B.U's funds or other products;
- or
- (d) where you submit information to H.B.U via H.B.U's website or other online services.

Generally, H.B.U will collect personal information directly from you. However there may be circumstances where H.B.U collects your personal information from third parties. For example, where you apply to invest in H.B.U's funds or other products, H.B.U may collect personal information regarding you from any manager, registry services provider or fund administrator appointed by H.B.U in respect of the relevant fund or product.

Purposes for which H.B.U collects, holds, uses and discloses personal information

H.B.U collects, holds, uses and discloses personal information about you for purposes relating to H.B.U's funds management business and operations, including for the purposes of:

- (a) providing you with information regarding the funds and other products or services of H.B.U;
- (b) processing your application for investments in the funds or other products or services of H.B.U;
- (c) establishing your investment in a fund or other product or service of H.B.U; and
- (d) administering your investment in a fund or other product or service of H.B.U.

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

If you do not want to receive this information or do not want H.B.U to use or disclose your personal information for direct marketing purposes, you can opt out at any time by contacting H.B.U. using the contact details set out below.

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

Disclosures of personal information by H.B.U

H.B.U discloses your personal information to others for the purpose for which we collect it. This means that, generally, H.B.U will only disclose your personal information for a purpose related to the provision of H.B.U's funds management services.

The types of organisations to which H.B.U may disclose your personal information to include:

- (a) your financial advisers or other professional advisers;
- (b) related companies of H.B.U (such as subsidiaries or holding companies of H.B.U);
- (c) any manager appointed by H.B.U in respect of H.B.U's funds or other products;
- (d) any registry service provider, fund administrator or other similar service provider appointed by H.B.U in relation to H.B.U's funds or other products;
- (e) any other third party service provider which H.B.U may engage to provide investment management, custody, administration, technology, auditing, mailing, printing or other services;
- (f) Government authorities where required to by law; and
- (g) H.B.U's professional advisers (including legal and accounting firms, auditors, consultants and other advisers).

H.B.U may also collect, hold, use and disclose personal information to undertake identification and verification processes in accordance with the *Anti-Money Laundering and Counter Terrorism Financing Act* or any other relevant laws. For certain investors, HBU may also be required to collect and disclose certain personal information to the Australian Taxation Office in order to comply with the *Foreign Account Tax Compliance Act* (FATCA).

H.B.U does not currently disclose personal information to recipients located overseas or have established plans to do so. If H.B.U is likely to disclose personal information to recipients located overseas, H.B.U will update this privacy policy regarding the likely disclosures (including, if it is practicable to do so, the countries in which such overseas recipients are likely to be located).

Security of your personal information

H.B.U may hold your personal information in both hard copy and electronic forms.

H.B.U will take reasonable steps to ensure that the personal information H.B.U holds is protected against misuse, loss, unauthorised access, modification or disclosure.

Personal information is held on secured servers or in storage located in controlled, access restricted environments. H.B.U's employees are required to maintain the confidentiality of any personal information held by H.B.U.

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

Access and correction of personal information

H.B.U 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.

You have the right to request access to the personal information H.B.U collects and holds about you. You also have the right to request correction of the personal information H.B.U collects and holds about you.

If at any time you would like to request access to or correction of the personal information about you H.B.U collects and holds you can contact us using any of the below contact details:

H.B.U will seek to respond to requests for access to or correction of personal information within 30 days of the date of the request.

If H.B.U refuses any request for access to or correction of personal information held by H.B.U, written reasons for that refusal will be provided by H.B.U.

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

Privacy complaints

If you believe that H.B.U have not dealt with your personal information in a manner that complies with the Privacy Act or the Australian Privacy Principles or have any other complaint regarding how H.B.U has dealt with your personal information, you can make a privacy complaint to H.B.U.

Privacy complaints should be made to H.B.U in writing using the contact details set out below.

Upon receipt of your complaint, H.B.U will commence an investigation into your complaint.

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 effect your existing obligations or effect the commercial arrangements between you and H.B.U.

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 Office of the Australian Information Commissioner.

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 H.B.U using any of the following contact details:

Privacy officer

H.B.U. Investments Limited
ACN 608 424 488 AFSL 482375
352 Bay Road, Cheltenham VIC 3192
Email: admin@hbuintestments.com.au
Phone Number: 03 8456 6400