

## About this Privacy Policy

Azure Capital Limited and its related entities ('Azure') is committed to treating the personal information we collect in accordance with the Australian Privacy Principles in the Privacy Act 1988 (Cth) (Privacy Act) and the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

In this Privacy Policy, any mention of 'Azure', 'we', 'us' and 'our' refers to Azure Capital Limited and its related entities.

This Privacy Policy has been published to provide a clear and concise outline of how and when personal information is collected, disclosed, used, stored and otherwise handled by Azure. The Policy relates to personal information collected by any means and by any technology.

By using the products or services provided by us you consent to Azure using your personal information as set out in this Privacy Policy.

The Policy outlines the obligations Azure has in managing the personal information we hold about our clients, potential clients, contractors and others, in order to comply with the Privacy Act. It is our objective to handle information responsibly and provide you with some control over the way information about you is handled and stored

## Our Commitment to Protect Your Privacy

We recognise that any personal information we collect about you will only be used for the purposes we have collected it or as allowed under the law. It is important to us that you are confident that any information we hold about you will be treated in a way which ensures protection of that information.

Our commitment in respect of your information is to abide by the Australian Privacy Principles, as set out in the *Privacy Act 1988* (Cth) and other relevant law.

## Personal Information

When we refer to **personal information** we mean information or an opinion relating to an individual which can be used to identify that individual.

The kinds of personal information we collect about you includes (but is not limited to):

- Names
- Contact Details
- Genders
- Dates of Birth
- Employment details and employment history
- Tax File Numbers

You have a right not to provide the information that can identify you, but failure to provide such information may affect the services we provide to you. We will not collect any personal information about you except when you have knowingly provided that information to us or authorised a third party to provide that information to us.

### **Why we Collect Your Personal Information**

We collect personal information for the purposes of identifying you, accessing Azure Group's managed funds and access to capital raisings. We may also collect your personal information for the purposes of managing our relationship with you. The information may also be used by us for planning, product development and research purposes.

In providing our services to you we may need to disclose personal information to a third party. This will be done to the extent that it is permitted by law and set out in this Policy.

### **How do we Collect Your Personal Information?**

Where reasonable and practical we will collect your personal information directly from you.

### **Do we Disclose Your Personal Information?**

We may disclose your personal information:

- to share registries;
- to other Azure entities;
- to other financial institutions that provide financial services eg stockbrokers, fund administrators, custodians, responsible entities;
- to other organisations that are involved in managing or administering our financial services such as third party suppliers, printing and postal services;
- to companies that provide infrastructure systems to us;
- to anyone, where you have provided us consent;
- where we are required to do so by law, such as under the *Anti-Money or Laundering and Courter Terrorism Financing Act 2006 (Cth)* or the *Corporations Act 2001 (Cth)*;
- to any person where we are required by law to do so; or
- to any person or entity considering acquiring an interest in our business or assets.

Prior to disclosing any of your personal information to another person or organisation, we will take all reasonable steps to satisfy ourselves that:

- a) the person or organisation has a commitment to protecting your personal information at least equal to our commitment, or
- b) you have consented to us making the disclosure.

### **Direct Marketing**

From time to time we may use your personal information to provide you with offers you may find of interest, changes to our organisation, or new products or services being offered by us.

If you do not wish to receive marketing information, you may at any time decline to receive such information by emailing us at [admin@azurecapital.com.au](mailto:admin@azurecapital.com.au). If the direct marketing is by email you may also use the unsubscribe function. 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 Personal Information**

It is important to us that the personal information we hold about you is accurate and up to date. During the course of our relationship with you we may ask you to inform us if any of your personal information has changed. If you wish to make any changes to your personal information, please contact us. We will generally rely on you to ensure the information we hold about you is accurate or complete.

### **Access and Correction to Your Personal Information**

We will provide you with access to the personal information we hold about you. You may request access to any of the personal information we hold about you at any time. We may charge a fee for our costs of retrieving and supplying the information to you, depending on its location and volume.

Depending on the type of request that you make we will usually respond to you within 14 days of receiving your request. We may need to contact other entities to properly investigate your request.

There may be situations where we are not required to provide you with access to your personal information, for example, if the information relates to existing or anticipated legal proceedings, or if your request is vexatious. An explanation will be provided to you if we deny you access to the personal information we hold about you.

If any of the personal information we hold about you is incorrect, inaccurate or out of date you may request that we correct the information. If appropriate we will correct the information. At the time of the request, otherwise, we will provide an initial response to you within 7 days of receiving your request. Where reasonable, and after our investigation, we will provide you with details about whether we have corrected the personal information within 30 days. If we refuse to correct personal information we will provide you with our reasons.

### **Using Government Identifiers**

We do collect government identifiers, such as your tax file number but only when you invest in a managed fund.

### **Business Without Identifying You**

It is necessary for us to identify you in order to undertake business with you. Therefore we will be unable to do business with you if you wish to remain anonymous.

## **Sensitive Information**

Sensitive information is personal information that includes information relating to your racial or ethnic origin, political persuasion, memberships in trade or professional associations or trade unions, sexual preferences, criminal record, or health. At this time we do not collect any sensitive information.

## **How Safe and Secure is Your Personal Information that we Hold?**

We will take reasonable steps to protect your personal information by storing it in a secure environment. We may store your personal information in paper and / or electronic form. We will also take reasonable steps to protect any personal information from misuse, loss and unauthorised access, modification or disclosure.

## **Complaints**

If you are dissatisfied with how we have dealt with your personal information, or you have a complaint about our compliance with the Privacy Act, you may contact our Compliance Officer:

Address: Level 34 Exchange Tower  
2 The Esplanade  
Perth WA 6000

T: + 61 8 6263 0888

F: + 61 8 6263 0878

Email: [compliancescp@azurecapital.com.au](mailto:compliancescp@azurecapital.com.au)

We will acknowledge your complaint within 7 days. We will provide you with a decision on your complaint within 30 days.

If you believe Azure has not adequately dealt with your complaint and you are not satisfied with FOS, you may also complain to the Officer of the Australian Information Commissioner (OAIC) whose contact details are as follows:

Address: GPO Box 5218  
Sydney NSW 2001

T: 1300 363 992

Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

You may also lodge a complaint directly with the OAIC on their website.

## **Compliance Officer's Contact Details**

You may request further information about the way we manage your personal information by contacting us. Please address all written correspondence to our Compliance Officer whose contact details appear above.

## **Changes in our Privacy Policy**

We may, without notice, amend this Policy from time to time for any reason and will update the Policy accordingly. We ask that you visit our website periodically in order to remain up to date with such changes. 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.

You may request a copy of this Privacy Policy in an alternative form.

**Azure Capital Limited**

**Version 4: January 2018**