



Privacy Policy

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Introduction

L1 Capital Pty Ltd (ABN 25 125 378 145) (“L1”, “we” or “us”) values the privacy and security of information about our clients and potential investors. L1 only collects personal information that is necessary to assist us in providing our services to our clients. In this policy, we set out how and why L1 will collect, store, use, disclose and otherwise manage your personal information.

Personal Information is defined in this Policy as any information that alone or together with other information in L1’s possession relates to an identified or identifiable person, such as name, phone number, email address and investor number (“Personal Information”).

By visiting any website operated by L1 that links to this Policy (the “Website”), using any of our services or otherwise providing us with your Personal Information (or authorising it to be provided to us by someone else), you agree to your Personal Information being collected, stored, used, disclosed and otherwise managed as set out in this Privacy Policy, including transfers to third parties and other countries.

This Privacy Policy sets out how and why L1 will collect, store, use, disclose and otherwise manage your personal information. This Policy covers the obligations of L1 and its related bodies corporate and affiliates.

What Personal Information does L1 collect?

L1 may collect, process use and disclose Personal Information that is necessary to assist us in providing our services to our clients, including opening an account, engaging in a transaction, speaking with us on the telephone, emailing us, registering to attend an event or a webinar or in connection with your use of the Website.

In this section, we set out our information-collection practices, including the types of Personal Information that we collect. In subsequent sections of this Policy, we describe how we use and disclose Personal Information.

If you provide us with Personal Information that we have not requested (unsolicited Personal Information) we will, unless otherwise required or permitted by law, delete or destroy it as soon as possible after receiving it.

In certain circumstances we may be required or permitted by law or a Court or Tribunal to collect certain Personal Information about you. For example, we may need to collect your name, residential address, country of residence, date of birth, business name (if any), directorship appointments (if any) and other types of Personal Information required by law, including (but not limited to) information required under the following:

- *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* and *Anti-Money Laundering and CounterTerrorism Financing Rules Instrument 2007* (“AML/CTF Laws”)
- *Income Tax Assessment Act 1997 / Tax Administration Act 1953*
- *Superannuation Industry (Supervision) Act 1993*

For certain investors, L1 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”) or the *Common Reporting Standard* (“CRS”).

You do not have to provide us with your Personal Information but if you do not provide us with the Personal Information that we need, we may not be able to provide our services or assistance to you or our clients on your behalf and may not be able to process any application by you for investment in our funds or other products.

Personal Information we collect directly from you, such as when you open an account, register to use our Website, request information from us or register for an event

L1 may collect and maintain Personal Information about you, and about any person or entity on whose behalf you are acting, that you provide to us through our Website, such as when you register to use our Website, attend an event, subscribe to our newsletter, or obtain a product or service from L1. The types of Personal Information will vary based on your interaction with us, but could include:

- name and company information (if applicable)
- phone numbers,
- address,
- email address,
- banking details,
- date of birth,
- country of residence,
- investment details,
- payroll details,
- taxation details (including Tax File Number),
- dietary requirements (if attending an in-person event);
- identification documents such as driver licence, passport, Medicare card or utility bill; and
- other accounting, audit and financial services related information.

We also may collect Personal Information for your account from third parties authorised to disclose your Personal Information, such as from your employer or from companies that provide identification verification services.

Information about Third Parties

We may collect information from you regarding other individuals related to your account. By disclosing information about authorised signatories, dependents, relatives, potential beneficiaries, employees, agents, or other representatives as outlined above, you warrant that you have the consent of those parties to such collection, use, and disclosure of their information as described in this Policy.

Information from telephone, email or Website communications with L1

If you communicate with L1 by telephone, email or via the Website, we may keep a record of that communication. In accordance with the relevant law, we also may record and monitor telephone calls for training, quality assurance, security, and customer service purposes.

Information you provide to public websites or social media platforms that relate to L1 or our products or services

We may also collect information about you from public websites or social media where you have communicated in relation to L1 or our products or services.

If you do not provide the Personal Information requested, we may not be able to process an application, provide services to you, or provide you with information about our products and services.

How does L1 collect Personal Information?

L1 may collect your Personal Information in various ways, including via telephone, our Website, email or hardcopy and/or online forms. In most situations we collect your Personal Information directly from you.

However, we may also collect information from third parties, such as trustees and responsible entities, fund managers, companies / trusts in which you are a unit holder, shareholder or officeholder, your employer, your financial adviser and/or anyone you have authorised to deal with us on your behalf.

Depending on the type of service requested, we may also seek to collect information about someone else from you (for example, details of the members of your company/fund or your employees/contractors). However, you must not provide us with Personal Information about another person unless you have clear consent from that person to do so, have told them that their Personal Information will be handled in accordance with this Privacy Policy and where they can find it.

On all occasions, Personal Information is collected, held, used, disclosed and otherwise managed by us in accordance with this Privacy Policy.

What other information do we collect?

We automatically gather information about you when you visit our website or interact with our emails, including whether you click on links within them. Our collection methods involve the use of technologies such as cookies, web beacons, and other similar mechanisms, which are explained in more detail below. By gathering this data, we gain insights into how our website is utilized and how you engage with the content we send you. During your visit, we or our third-party service providers may collect a range of technical and navigational information about you, including your device type, operating system version, browser type and version, Internet connection type, mobile network provider, and the time and date of your visit. Additionally, we may collect information about the specific web pages you view, the links you click, the searches you conduct on our website, and the IP address used to access our site. We may also collect general geographic location information, such as your city, state, post code, or metropolitan region, as well as data about the website you visited prior to ours. For a more detailed explanation of the information collected, please refer to the section below titled "Website Analytics and Interest-Based Advertising." Furthermore, we may use similar tracking technologies in emails that we or third parties send to you, as further described below.

Cookies

A cookie is a small file containing a combination of letters and numbers that gets stored on your computer, tablet, mobile phone, or other device when you visit a website. Cookies contain information that can be transferred to or read from your device, enabling websites to identify and remember devices and store certain information such as user preferences. Cookies help us distinguish you from other users of our Sites, improving your browsing experience on our website and allowing us to enhance its functionality. Our website employs both session cookies, which are active for a specific browsing session and expire upon session end, and persistent cookies, which remain on your device and remember your actions or preferences across multiple browsing sessions.

We understand that some clients may have concerns regarding cookies being stored on their devices. If you prefer, you can configure your browser settings to refuse all cookies or prompt you when a cookie is being set, giving you the choice to accept or decline it. Additionally, you can delete cookies from your device. Most web browsers have a help feature that can guide you on how to prevent your browser from accepting new cookies, receive notifications when new cookies are set, and disable cookies altogether. However, please be aware that if you choose to block or delete cookies, some of the features on our website may not function correctly. To learn more about how to opt-out of cookies for specific purposes, such as interest-based advertising, please refer to the section titled "Third-Party Analytics and Interest-Based Advertising" below.

Web beacons

L1's Website and emails may use web beacons, also known as pixel tags or clear gifs, to collect information about your email usage. These web beacons are electronic files that typically contain a single-pixel image. We and our service providers may use web beacons and cookies to determine whether and when you open our emails, as well as to gather information such as the type of device, operating system, email program, and web browser used to view the email, the

IP address from which you opened the email, and whether you click on any links in the email. These technologies allow us to assess the effectiveness, relevance, and value of our email communications and to provide you with targeted advertising.

We may combine all the information we have collected about you, including your Personal Information, to better understand your preferences and needs. If you have registered for secure access on our Website or accessed an email that includes a web beacon or sets a cookie, we can link the information we collect about your usage of our Website with other information we know about you, such as any searches you conduct or information you request during your web session. This allows us to identify your computer or device on each visit to our Website and determine whether you came to our Website by clicking on an email link. By linking this information, we can assess the usefulness of the information and tools offered on our Website and the effectiveness of our email communications and online advertising. This also helps us identify L1 products that may be of interest to you. For more information about how we and our service providers use information for analytics and advertising purposes, please see the section below titled "Website Analytics and Interest-Based Advertising."

Why does L1 collect and use Personal Information?

L1 only collects, holds and uses Personal Information for the purposes for which it was provided (which will normally be obvious at the time of collection), related purposes or as permitted or required by law. Such purposes may include:

- Establishing, maintaining and administering your account or your investment in any of L1's funds or other products;
- Conducting verifications, monitoring and reporting required under the AML/CTF Laws;
- Recording tax information such as TFN, ABN, country of residence in order to report to the ATO (and other relevant bodies as required by law) and withhold tax correctly from payments;
- Communicating with you or our clients regarding the status of your unit / share holdings, value, distributions or responding to your and/or our clients' enquiries / information requests;
- Processing authorised payments to and from you;
- Providing you and/or our client with the services requested (such as unit registry and investor relations services, accounting and fund administration services, payroll services and compliance services);
- Quality assurance and training purposes;
- To comply with our legal obligations;
- To count and recognise visitors to the Website;
- To support Website performance, perform Website analytics, enhance Website navigations, and improve our Website's design and functionality;
- For Website and account security purposes; and
- Any other uses identified at the time of collecting your Personal Information.

In addition to the purposes set out above, L1 may collect, use and disclose your Personal Information to inform you of products, services or offers of L1, its related companies or commercial partners which may be of interest to you.

Where you are an investor in a fund or other product of L1, this may include providing you with direct marketing information regarding the other funds or products of L1 or its related companies. If you do not wish to receive such material, you can opt out at any time using the details in the "Contact Us" section below.

Who does L1 disclose Personal Information to?

Any Personal Information provided to us may be disclosed to other entities in order to facilitate the purpose for which the information was collected. Such entities generally include:

- The ATO for the purpose of legislative compliance and reporting;
- ASIC or the ASX for the purpose of legislative compliance and reporting;
- Third party service providers for the purpose of enabling them to provide a service such as unit registry, payroll, superannuation administration, audit and tax, secure storage and archiving services, or product management (such as trustees and responsible entities);
- Your personal financial advisor / planner or legal advisor and their service providers (if you have provided consent for such disclosure) for the purpose of managing your affairs;
- Entities on behalf of which we provide our services to you (including your fund manager, responsible entity, trustee, company for which you work or in which you have shares);
- Government bodies, regulators, law enforcement agencies and any other parties where authorised or required by law;
- Other entities if you have given your express consent; and
- Any other entities identified at the time of collecting your Personal Information or to which we are legally required to disclose your Personal Information.

Direct Sharing through Third-Party Websites and Services

The Website offers features that allow you to share information directly with third-party websites and online services. For instance, you can share articles or content through Facebook, Twitter, LinkedIn, and other services, and view content through video players and other services such as the YouTube video player. By using these features, you may disclose information to those websites or services, and their users, and even to the public at large. These third-party websites and services may also set and/or access cookies on your device. Please be aware that because these websites and services are not operated by L1, we are not responsible for their content or practices. The collection, use, and disclosure of information through these websites and services will be subject to their own privacy policies and not this Policy.

Event Registrations

L1 may use third-party software applications to facilitate event registrations, either on the Website or elsewhere. If you decide to register for an event, either L1 or a third-party may request personal information such as your name, address, telephone number, email address, and any other relevant information needed to coordinate your attendance.

Aggregated Information

From time to time, L1 may share aggregated information about users of the Website, such as sharing reports on the usage of the Website for regulatory reporting or marketing purposes.

A small number of fund managers and/or third party service unit registry providers that we deal with are located in countries outside of Australia (including the USA, Singapore, India Mauritius and the Cayman Islands). Our contracts with these parties generally include an obligation for them to comply with Australian privacy law and this Privacy Policy. However you acknowledge that, by agreeing to the disclosure of your Personal Information to these entities outside of Australia, we will no longer be required to take reasonable steps to ensure the overseas recipient's compliance with the Australian privacy law in relation to your Personal Information and we will not be liable to you for any breach of the Australian privacy law by these overseas recipients. On this basis, you consent to such disclosure.

Website Analytics

We work with third-party partners who help us gather, analyse, and report on the information we collect as described above. These partners may use cookies and web beacons to track your activity on the Website. Specifically, we use Adobe Analytics and Google Analytics to collect and analyse information for the purposes discussed earlier. Your information may be transmitted to and stored on servers located outside of your country of residence. You can opt out of cookies used by Adobe Analytics [here](#), and you can opt out of cookies used by Google Analytics [here](#).

Please note that while our Website doesn't currently respond to "do not track" browser headers, you can still limit tracking by following the steps outlined above. The use of tracking mechanisms by third parties is subject to their own privacy policies, not ours.

Links to third party websites

Our Website contains links to the websites of other entities. If you click on such links, you will be transferred to the website of these entities. L1 has no control over, and is not responsible for, the privacy practices of these entities. You should read the privacy policy of these entities to find out how they handle your Personal Information when you visit their websites.

How does L1 protect and retain Personal Information?

We take reasonable steps to protect any Personal Information that we hold from misuse, interference and loss and from unauthorised access, alteration and disclosure. For example, we implement the following security measures:

- Security procedures for access to our business premises;
- Security procedures within our offices;
- IT security procedures including password protection, firewalls, intrusion detection and site monitoring; and
- Mandatory confidentiality guidelines for all staff within the business.

Personal Information is held in the cloud (stored on Microsoft SharePoint) or in storage located in controlled, access restricted environments. L1's employees are contractually required to maintain the confidentiality of any Personal Information held by us. Further information can be found in L1's Information Security Policy which is available upon request.

Personal Information may also, in certain circumstances, be held on behalf of L1 in hard copy or electronic forms by L1's service providers (such as offsite document storage providers, electronic data storage providers or registry service providers). L1 enters into agreements with such service providers which impose confidentiality and privacy obligations on the service provider.

However, data protection measures are never completely secure and, despite the measures we have put in place, we cannot guarantee the security of your Personal Information. You must take care to protect your Personal Information (for example, by protecting any usernames and passwords). You should notify us as soon as possible if you become aware of any security breaches.

L1 retains Personal Information for as long as is required for the purposes set out above, or as required by law, regulation or internal policy.

Accessing Personal Information held by L1

You have a right to request access to the Personal Information we hold about you. Where you make such a request, we will generally provide you with access to Personal Information we hold about you, subject to a small number of legal restrictions or exemptions. Where such restrictions or exemptions exist we will advise you of those reasons at the time of your request or as soon as practical after you make the request.

If you wish to access the Personal Information we hold about you, you should contact us using the details in the “Contact Us” section below.

While we do not charge you for a request for accessing your Personal Information you should be aware that we may charge a reasonable fee (which will be notified to you once you make a request) for time and cost in the following circumstances:

- If an extended amount of time is required to collate and prepare material for you; and
- If you wish to have your files photocopied for you.

How can you correct and update your information?

You have a right to request the correction of any Personal Information we hold about you. We take reasonable steps to ensure that the Personal Information we hold about you is accurate, complete and up to date. However, we also rely on you to advise us of any changes to your Personal Information.

Please contact us using the details in the “Contact Us” section below as soon as possible if there are any changes to your Personal Information or if you believe the Personal Information we hold about you is not accurate, complete or up to date so that we can update your file accordingly.

Notifiable data breaches scheme

L1 is fully compliant with the data breach notification obligations that arise when a data breach is likely to result in serious harm to any individuals whose Personal Information is involved in the breach. L1 has in place a Data Breach Response Plan which ensures L1 employees understand their roles and responsibilities should a notifiable breach occur.

What do you need to do if you have a complaint?

If you wish to make a complaint about a breach of this Privacy Policy or the privacy principles of the *Privacy Act 1988* you can contact us using the contact details below. You will need to put your complaint in writing and provide us with sufficient details regarding your complaint together with any supporting evidence.

We will refer your complaint to our Head of Legal and Compliance who will investigate the issue and determine the steps (if any) that we will undertake to resolve your complaint. We will contact you if we require any additional information from you and will notify you in writing of the outcome of the investigation.

If you are not satisfied with our determination, you can contact us to discuss your concerns or complain to the Australian Privacy Commissioner via www.oaic.gov.au.

Revisions to this privacy policy

L1 regularly reviews its practices and procedures regarding how it collects, holds, uses, discloses and otherwise manages Personal Information. As a result, L1 may update this Privacy Policy from time to time, so please review it periodically for changes on our Website at www.L1.com.au.

Your continued use of our services (including online services), requesting our assistance or the provision of further Personal Information to us (directly or via an authorised person) after this Privacy Policy has been revised, constitutes your acceptance of the revised Privacy Policy.

Contact us

If you have a query relating to this Privacy Policy or wish to make a complaint, please contact us using the following contact details:

L1 Capital Pty Ltd

Level 45, 101 Collins Street Melbourne, Victoria 3000, Australia

Phone: (03) 9286 7000

Email: info@L1.com.au