



SharePrices

Diversified Investment Trust

Privacy

Policy

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1. Introduction

This Privacy Policy applies to (“Australian Managed Funds”) which is a registered trading name of Share Prices Funds Management Pty Ltd ABN 51 623 404 339.

Australian Managed Funds is a Corporate Authorised Representative (CAR) of Share Prices Australia Pty Ltd ABN 82 105 855 892 who holds an Australian Financial Services Licence (AFSL 287367), (CAR) Number: 001263287 for the purpose of financial and securities services.

For the purpose of Managed Investments, Australian Managed Funds is a Corporate Representative of Gleneagle Asset Management Pty Ltd, ABN 29 103 162 278 who holds an Australian Financial Services Licence (AFSL 226199)

This Privacy policy applies to Australian Managed Funds and its related affiliates including Share Prices Australia Pty Ltd (Share Prices), Share Prices Financial Services (Australian IPOs), Share Prices Advisory Services and our affiliated companies, financial advisers and appointed corporate authorised representatives (together and separately, “we”, “us” and “our”).

Australian Managed Funds values and respects your privacy and we value your trust. Australian Managed Funds is committed to protecting your privacy by applying our strict security protocols to secure the privacy and confidentiality of your personal information.

This Privacy Policy explains how we handle your personal information and that of others regardless whether or not they are customers of ours in order to ensure we meet our obligations under the Privacy Act 1988 (Cth) (Privacy Act).

From 12 March 2014, we are subject to the new privacy requirements as a result of implementation of the Australian Privacy Amendment (Enhancing Privacy Protection) Act 2012 (the Privacy Act), which amends the Privacy Act 1988. In particular we must adhere to the Australian Privacy Principles in relation to collecting, using, disclosing, securing and allowing access to, your personal information.

This policy (together with our Terms of Use and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting the Australian Managed Funds website and any of its inner pages, including any sub-domains thereof (“our site”) you are accepting and consenting to the practices described in this policy.

2. Consent

By electing to acquire or enquire about our services, you will be deemed to consent to us collecting and using your personal information in a manner consistent with this Privacy Policy, including (if applicable) monitoring your use of our website. Your consent will be considered by us as either or combined as expressed consent, implied consent, authorised consent, allocated consent, appointed consent, written consent or verbal consent.

3. Why we collect information about you

The main reason as to why financial information companies like ourselves collect information about our clients (you) is so we are able to professionally provide you with the products and services you that have requested.

The other reasons as to why we collect your information is as follows (other than as required by law) include

- to enable you to access and use financial products, tools and services that we may offer or arrange;
- to operate, protect, improve and optimise our website, app, business and our users' experience, such as to perform analytics, conduct research and for advertising and marketing;
- to send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you;
- to send you direct and re-marketing promotional messages and other information that may be of interest to you, including information sent by, or on behalf of, our business partners, affiliates, third parties, related companies that we think you may find interesting;
- to administer rewards, surveys, contests, or other promotional activities or events sponsored or managed by us or our business partners; and
- to comply with our legal obligations, resolve any disputes that we may have with any of our users, and enforce our agreements with third parties.

4. How we collect information about you

In order to ensure the accuracy of your personal information, Australian Managed Funds will endeavour to collect your personal information directly from yourself. However, in some circumstances (where required) it may be impractical or unreasonable to collect the information in this way so a third-party person, agency, accountant, financial advisor, financial planner, stock broker, advisor or affiliate may provide your details.

The personal information that we collect may be provided to us from a variety of sources including but not limited to:

- by filling in forms on our websites;
- Subscribing to directly affiliated websites such as Shareprices.com.au, Australian-IPOs.com.au, Australianmanaged.funds.com.au and or other affiliated websites.
- registering to use our site or app or online presence including social media;
- subscribing to our Services;
- searching within our site, or place an order on our sites;
- by corresponding directly with us by phone, e-mail, meetings or otherwise;
- when you share information with us from other services or licensees;
- purchasing products and services we have provided to you in the past;
- when responding to your direct enquiries;
- use of affiliate or associated websites;
- when you attend a function, meeting, seminar or associated with our site;
- participate in discussion boards / forums or other social media;
- enter a competition, promotion or survey;
- when you report a problem with our site;
- from third parties such as Credit Reporting Bodies (CRBs) or other third parties that are permitted to disclose your personal information to us; and
- when you request information of our products or services via our advertising or marketing partners.

If you provide personal information to us about someone else, you must ensure that you are entitled to disclose that information to us. You should also take reasonable steps to ensure the individual concerned is aware of how we collect, use and disclose personal information for the purposes described in this Privacy Policy.

5. Information we may collect from you

Please note, the information that you provide us with may be used to contact and identify you, this information includes:

General information

- Your name
- E-mail address
- Phone number(s)
- Age and date of birth
- Nationality
- Your current and past mailing or street address
- Copies of your identification documents

Financial information

We also collect financial and trading information about you in order to provide the information or products or services that are required based on the information you have provided, this information includes:

- Your financial history
- Credit card information
- Banking details
- Personal trading information
- Trading interests
- Information about your assets and liabilities
- Your health or insurance related information
- Employment information

Security information

We may ask you for some identifying questions to help retrieve lost passwords such as mother's maiden name, favourite pet, first school etc.

Your Tax File Number (TFN) – (optional)

If we request your TFN, we are doing so as agent for your new superannuation scheme under the Superannuation Industry (Supervision) Act 1993. It is not an offence to decline to provide your TFN. However, if you fail to provide your TFN to your superannuation scheme or retirement product issuer, you may become subject to a "No-TFN" tax rate on employer contributions of 31.5%, as well as the mandated 15% tax rate on superannuation. You also have the right to deal with us anonymously, but if so, we may be unable to provide you with certain products or services.

6. Information we receive about you from other sources

We may receive information about you if you use any of the other websites we operate or are affiliated with or from any of the other services we provide.

We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

7. Technical information we collect about you

With regard to each of your visits to our site we may automatically collect the following technical information to assist us with improving our services and providing more accurate and relevant services to you:

Technical information

- The internet protocol (IP)
- Address used to connect your computer to the internet
- Your login information
- Browser type and version
- Your time zones
- Browser plug-in types and versions
- Your device type such as a mobile, tablets or computer
- What operating system and platform

Information about your visit

- Uniform Resource Locators (URL)
- Clickstream to, through and from our site
- Date and time
- Products you viewed or searched for
- Page response times
- Statistics on page views
- Download errors
- Length of visits to certain pages
- Traffic to and from the sites
- Geo-location information
- Page interaction information (such as scrolling, clicks and mouse-overs)
- Methods used to browse away from the page
- Any phone number used to call our customer service number

8. Cookies

What is a cookie?

A cookie is a small file of letters and numbers that is placed on your browser or the hard drive of your computer when you visit a website.

Most reputable websites will ask you if you will give permission for these cookies to be used whilst visiting their sites. Cookies contain information that is transferred to your computer or handheld mobile device hard drive.

Our site uses cookies to distinguish you and your computer from other users of our site.

This helps us to provide you with a good experience when you browse our site and also allows us to improve our site and provide to you what's relevant to you.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our site. They include, for example, cookies that enable you to log into secure areas of our site, use a shopping cart or make use of e-billing services.
- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our site when they are using them. This helps us to improve the way our site works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our site. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to our site, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

9. Use of your personal information

We only use your personal information for the purposes connected with the primary purpose of your data collection.

We use information held about you in the following ways:

Information you give to us

- to identify you when we are speaking with you;
- managing our relationship with you;
- maintaining your subscriptions or services with us;
- contacting you in regards to our product updates, additions and important announcements;
- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
- to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you;
- to notify you about changes to our service;
- to ensure that content from our site is presented in the most effective manner for you and for your computer;

- comply with our legal obligations; and
- assist government and law enforcement agencies or regulators.

If you are an existing customer, we will only contact you by telephone, postal mail or electronic means (e-mail, social media or SMS) with information about goods and services similar to those which were the subject of a previous expression of interest, previous sales or negotiations of a sale to you.

If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by either telephone, postal mail or electronic means if you have consented to this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which we collect your data.

The secondary purpose which we believe you should reasonably expect might include disclosure to maintenance personnel or other third-party contractors (including outsourced and cloud service providers) who may be unable to avoid accessing personal information in the course of providing technical or other support services to our company. Examples of disclosures may include disclosures to:

- our employees and related bodies corporate;
- third party suppliers and service providers (including providers for the operation of our associated websites and/or our business or in connection with providing our products and services to you);
- professional advisers, dealers and agents;
- our existing or potential agents, business partners or partners; (e) anyone to whom our assets or businesses (or any part of them) may be, or are transferred;
- specific third parties authorised by you to receive information held by us; and/or
- other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

Information we collect about you

We may also use the information that we collected about you:

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our site safe and secure;

- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you; and
- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

Information we receive from other sources

We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the type of information we receive).

We use all of the information we have, as stated in this policy, to help us provide and support our Services. We are able to deliver our Services, personalise content, and make suggestions for you by using this information to understand how you use and interact with our site and Services.

We may provide business partners with information about the reach and effectiveness of their advertising without providing information that personally identifies you, or if we have aggregated the information so that it does not personally identify you, for example, we may tell business partners how many people viewed a certain page on our site, or provide non-personally identifying demographic information to business partners to help them understand their audience or customers.

10. Disclosure of your information

We may disclose your personal information to any of our related or affiliated bodies, which means our subsidiaries, our ultimate holding company and its subsidiaries, or any other individual or organisation (“Person”) who directly or indirectly controls, is controlled by, or is under direct or indirect common control with, us, and includes any Person in like relation to a related body. A Person is deemed to control another Person if such person possesses, directly or indirectly, the power to direct or cause the direction of the management and policies of such other Person, whether through the ownership of voting securities, by contract or otherwise.

We may share your information with selected third parties including:

- businesses/companies listed on our site (described as “affiliates” on our site), suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- advertisers and advertising networks that require the data to select and serve relevant adverts to you and others;

- trusted partners who work on behalf of or with us under confidentiality agreements. These companies may use your personal information to help us communicate with you about the Services you are using and our offers, and our marketing partners. However, these companies do not have any independent right to share this information, except to the extent required by law;
- analytics and search engine providers that assist us in the improvement and optimisation of our site; and
- with vendors, service providers, and other partners who globally support our business, such as providing technical infrastructure services, analysing how our Services are used, measuring the effectiveness of ads and services, providing customer service, facilitating payments, or conducting academic research and surveys.

We may disclose your personal information to third parties:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets; and
- if Australian Managed Funds or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.

If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms of Use and other agreements; or to protect the rights, property, or safety of Share Prices, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

11. Keeping your information safe

The storage of your personal information is a priority of Australian Managed Funds and we ensure that your information will remain safe and secure at all times.

Australian Managed Funds has appointed both a physical (hands on) Privacy Officer and an internal IT specialist that focus on all the security aspects required to ensure your data remains secure.

At Australian Managed Funds we will store personal information locally, and on cloud hosted applications, some of which may be located overseas or on virtually hosted clouds.

Australian Managed Funds has taken adequate precautions to ensure that we will protect your personal information from any unauthorised access, modifications, deletions, misuse or loss by enforcing the latest internet security technologies and

firewalls along with extra building security features fitted at the physical locations of any local data storage.

Australian Managed Funds also provides thorough internal training for all staff that have access to any personal information.

Your personal information may also be transferred overseas when the third parties with whom we may share it (as described in this policy) when they are located overseas. An example of such a third party is Saxo Capital Markets (Australia) Pty Ltd (ABN 32 110 128 286) (Saxo) who is one of our clearing and execution brokers (see Saxo's Privacy Policy at <https://www.home.saxo/en-au/legal/privacy-policy/saxo-privacypolicy>)

In addition, it is possible that we, or our subcontractors, will utilise cloud technology in connection with the storage of personal information, and it is possible that this may result in off-shore storage.

It is not practicable for us to specify in advance the location of every service provider with whom we deal. It is possible that information will be transferred to a jurisdiction where you will not be able to seek redress under the Privacy Act and that does not have an equivalent level of data protection as Australia. If you have any concerns regarding the transfer of your personal information overseas please contact us using the details provided below.

Please note that despite all the security protocols and security services employ to protect your information, there are no guarantees that future technologies such as hackers or computer-based virus may access our stored information in the future despite our ongoing efforts to ensure our database security remains intact.

12. Employee records

In accordance with the Privacy Act, this policy does not apply to our acts and practices directly related to a current or former employment relationship between us and an employee, or to an employee record held by us relating to the employee.

13. Access to information

The Australian Privacy Principles give you the right to access information held about you. Your right of access can be exercised in accordance with those principles and the Privacy Act.

There is no set fee for requesting access to your personal information.

We will take all reasonable steps to correct any information you find inaccurate. Should we deny access and or refuse to correct your personal information, we will

provide you with reasons that will be based on the grounds provided by the Privacy Act. All requests for access to personal information should be made via e-mail to privacy@Australianmanagedfunds.com.au or by mail to the Privacy Officer, Level 27, 25 Bligh Street, Sydney Australia NSW, Australia 2000.

14. Updating and correcting your information

Although we take all reasonable steps to ensure that all your personal information that we collect is, accurate, complete and up-to-date, sometimes information is still missed – this can be easily rectified.

If you consider that the information which we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, we will take reasonable steps, consistent with our obligations under the Privacy Act, to correct that information if you so request. We will respond to all requests for access and/or correction within a reasonable time.

Please contact us at privacy@Australianmanagedfunds.com.au or by mail to the Privacy Officer, Level 27, 25 Bligh Street, Sydney Australia NSW, Australia 2000. Alternatively – Australian Managed Funds will provide you with instant online access to update your details at any time within the login members area.

Simply login to Australianmanagedfunds.com.au and click on your name and it will take you to the area called “Edit Personal Details” this area will allow you to update all data areas that are collected.

15. Marketing communications

Please note that Australian Managed Funds will contact you to provide you with information about the products and services you directly enquired about and other products and services that we, our related entities or our affiliated companies think may be of interest to you.

We may also re-advertise our products and services to you when you visit other websites via the use of any stored cookies that you may have accepted from us in the past.

You may “opt-out” from receiving communications from us or from third parties that send communications to you in accordance with this Policy.

You have the right to remove, edit or ask us not to process your personal data for any marketing purposes.

We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes.

You can also exercise the right at any time by contacting us at Customer Service or by using the 'unsubscribe' facility on the electronic communication with you.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

If you do not want to receive further marketing or promotions from us or our related companies or our advertisers/marketing partners, please contact us on 1300 123 345 or contact us at email: privacy@Australianmanagedfunds.com.au.

16. Links to other websites

The Australian Managed Funds website does contain many hyperlinks links to other websites for you to access.

Please be aware that the privacy policies of these different websites are all different than the Privacy Policy of Share Prices.

The operators of those other sites may not be the same as ours and you should refer to their own privacy policies as they will differ.

17. Complaints

We place a high priority on effectively dealing with any complaints you might have about breach of your privacy. We insist that complaints about breaches of the Privacy Act and the Australia Privacy Principles are made or confirmed in writing so that we can be sure about the details of the complaint. Generally, we will only accept complaints from an individual who believes an act or practice of us has interfered with their privacy and may have breached one of the Australian Privacy Principles.

A complaint should identify whether it is about:

- the collection, use or disclosure of personal information;
- the security or storage of personal information;
- the accuracy of personal information; or
- a refusal to give access to, change or delete personal information.

Our Privacy Officer will normally deal with privacy complaints. If the Privacy Officer is involved in the conduct the complaint is about, the complaint will be dealt with by an alternative officer appointed by us who was not involved in the complaint.

We will attempt to confirm with the complainant:

- their understanding of the conduct relevant to the complaint;
- their understanding of the Australian Privacy Principles relevant to the conduct; and
- what they expect as an outcome.

We will inform the person making the complaint:

- whether we will conduct an investigation; and
- the name, title and contact details of the investigating officer.

After we have completed our enquiries, we will contact the complainant, usually in writing, to advise the outcome and invite a response to our conclusions about the complaint. If a response is received, we will assess it and advise if we have changed our view.

If the complainant is unsatisfied with the outcome, we will advise further options including, if appropriate, review by the Privacy Commissioner within the Office of the Australian Information Commissioner.

If you have a complaint about the way in which we have handled a privacy issue, you may contact us at: privacy@Australianmanagedfunds.com.au or via another option below.

If you are not satisfied with the process of making a complaint to our Privacy Officer you may make a complaint to the Office of the Australian Information Commissioner at: GPO Box 5218, Sydney NSW 2001

Email: enquiries@oaic.gov.au Telephone: 1300 363 992.

If you still do not get a satisfactory outcome, you have the right to complain to the Australian Financial Complaints Authority (AFCA). AFCA is an external complaints and dispute resolution body. The service to you is free. The contact details for AFCA are: Australian Financial Complaints Authority G.P.O. Box 3, Melbourne VIC 3001 Toll Free: 1800 931 678 (free call) Facsimile: +61 1800 931 678 Website: www.afca.org.au Email: info@afca.org.au

18. Terms and Conditions

Permission to use our website and its services is conditional upon your agreement and acceptance of the terms and conditions (see Terms and Conditions).

By clicking 'I Accept' or "Join" or "Register for Instant Access" when joining the SharePrices.com.au, Australian IPO or Australian Managed Funds website services, you will be deemed to have accepted our Terms and Conditions and Privacy Policy terms as stated in the sign up procedure.

19. Changes to our Privacy Policy

At the time of publishing this Privacy Policy, all of our policies and procedures are up-to-date with all the required privacy legislations. Australian Managed Funds will make regular changes and updates to this Privacy Policy to make sure that all policies are up-to-date.

All changes we may make to our Privacy Policy in the future will be posted on this page and will be readily available on every page of the Australian Managed Funds website.

From time to time, we may change our policy on how we handle personal information or the types of personal information which we hold. Any changes to our policy will be published on our website.

You may obtain a free copy of our current policy from our website or by contacting us on the details below. It is your responsibility to check the website from time to time in order to determine whether there have been any changes.

Please check back frequently to see any updates or changes to our Privacy Policy. Any information collected after an amended Privacy Policy has been posted on our site, will be subject to that amended Privacy Policy.

20. Contact us

How to Contact Us

If you have any questions or concerns about our Privacy Policy our practices, or you require information, or wish to make a complaint, please contact us at:

Email: privacy@Australianmanagedfunds.com.au

Address: Level 27, 25 Bligh Street, Sydney Australia NSW, Australia 2000.

Phone: 1300 123 345

Alternatively, please visit our [Contact Us](#) section.

21. Issue date and version

Version:5.27

This Privacy Policy was last updated on Wednesday 25th of August 2020 and is subject to change.