



Plenary
Funds Management

Privacy Policy

Document Details

Document Owner:	Company Secretary
Author:	Certainty Compliance Pty Ltd
Approved by:	Board of Directors
Any questions about this document:	Sofie Remmery (PFM Compliance Manager) sofie.remmery@plenary.com
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2. Privacy Policy

2.1 Our commitment to protect your privacy

Plenary Funds Management (ACN 647 661 372) and its affiliates (collectively known as "**PFM**" and also referred to in this Policy as "**us**," "**we**" and "**our**") recognises the importance of ensuring its clients have confidence in the way PFM handles personal information.

We understand how important it is to protect your personal information. This document sets out our Privacy Policy commitment in respect of personal information that you may provide to us.

Any personal information we collect about you will only be used for the purposes indicated in this policy, where we have your consent to do so, or as otherwise required or authorised by law. It is important to us that you are confident that any personal information we collect from you or that is received by us will be treated with respect and appropriately protected.

Our commitment in respect of personal information is to abide by the Australian Privacy Principles set out in Schedule 1 of the Privacy Act 1988 (Cth) ("**Privacy Act**"), for dealing with data breaches under the Notifiable Data Breach Scheme, and any other relevant law.

2.2 Who is PFM?

PFM, a subsidiary of Plenary Group Holdings Pty Limited, is a boutique infrastructure fund manager within a market leading PPP infrastructure development, investment, and management business.

PFM provides investment management services for unlisted infrastructure funds and separately managed client accounts, specifically those invested in social infrastructure assets. These assets include PPPs, aged care businesses, disability care businesses, social housing, and other assets in the social infrastructure and social care sector.

Although the exact scope of each mandate will differ based on the fund or client account, the core focus of PFM is providing investors with the opportunity for stable, long term returns through investment in high-quality unlisted social infrastructure assets, primarily in Australia and New Zealand.

2.3 Personal Information

When we refer to *personal information*, we mean information or an opinion about you, from which you are, or may reasonably be, identified.

This information may include (but is not limited to) your name, date of birth, driver's licence number, marital status, phone number, email address, address, nationality, tax file number, employment history, income, assets, and liabilities.

It is not common practice for us to collect other sensitive information about you (such as information about your religion, trade union membership, political opinion, or sexuality and gender identity). We will only collect sensitive information about you where required and with your consent.

2.4 Why we collect your Personal Information

We collect and receive personal information about you in order to conduct our business, including when you make an application for investment in managed investment schemes, securities, and other financial products we act as investment manager for. From time to time we may offer other products and services.

2.5 How do we collect your Personal Information?

Personal information may be collected by us in a number of circumstances, including when an individual:

- makes an enquiry with us via email or telephone
- lodges an enquiry through our website
- applies to invest in a product offered by us
- attends an event hosted by us
- applies to work with us (e.g. employee); or
- is engaged to work with us (e.g. advisor).

Where reasonable and practical we will collect your personal information only directly from you. However, we may also collect information about you from third parties such as from our contractors who supply services to us, through our referrers, from a publicly maintained record or from other individuals or companies as authorised by you.

If you do not provide the information requested by us, we may not be able to provide you with our services.

If you provide personal information to us about someone else, you must ensure that you are entitled to disclose that information to us and that, without us taking any further steps required by privacy laws, we may collect, use, and disclose such information for the purposes described in this Privacy Policy. For example, you should take reasonable steps to ensure the individual concerned is aware of the various matters detailed in this Privacy Policy. The individual must also provide the consents set out in this Privacy Policy in respect of how we will deal with their personal information.

2.6 How do we use your Personal Information?

We use your personal information for the purpose for which it has been provided, for reasonably related secondary purposes, any other purpose you have consented to, and any other purpose permitted under the Privacy Act. This may include using your personal information for the following purposes:

- to provide you with the products or services you requested
- to verify your identity
- to assess, process and manage your application to become a client, including to verify your details and assess our risk
- to assess, process and manage your application to work with us
- to assess, process and manage your engagement with us; or
- for complaints handling or data analytics purposes.

2.7 To whom will we disclose your Personal Information?

To enable us to maintain a successful business relationship with you, we may disclose your personal information to:

- organisations that provide products or services used or marketed by us, including intermediaries, custodians and trustee companies, financial institutions, and execution and clearing providers
- your employer/s or referees, your professional advisors, your bank, and any other organisation that may have or is considering having an interest in your investment, or in our business
- companies and contractors who we retain to provide services for us, such as IT contractors, call centres, stationery printing houses, mail houses, storage facilities, risk and compliance providers, lawyers, accountants, and auditors, who will need to have access to your personal information to provide those services
- people considering acquiring an interest in our business or assets; and
- other individuals or companies authorised by you.

By providing us with your personal information, you consent to us disclosing your information to such entities without obtaining your consent on a case-by-case basis.

Sometimes we are required or authorised by law to disclose your personal information. Circumstances in which we may disclose your personal information would be to a Court, Tribunal, or law enforcement agency in response to a request or in response to a subpoena or to the Australian Taxation Office.

We may from time to time transfer personal information outside Australia in accordance with the Privacy Act to countries whose privacy laws do not provide the same level of protection as Australia's privacy laws. For example, we may transfer your personal information to the Asia-Pacific, European Union, or the United States of America. We may also use cloud storage servers that are located offshore.

By providing us with your personal information, you consent to us disclosing your information to entities located outside Australia and, when permitted by law to do so, on the basis that we are not required to take such steps as are reasonable in the circumstances to ensure that any overseas recipient complies with Australian privacy laws in relation to your information.

2.8 Direct marketing

From time to time we may use your personal information to provide you with current information about our products, information you may be interested in, changes to our organisation, or new products or services being offered by us or any company we are associated with. By providing us with your personal information, you consent to us using your information to contact you on an ongoing basis for this purpose, including by mail, email, SMS, social media, and telephone.

If you do not wish to receive marketing information, you may at any time decline to receive such information by contacting our Privacy Contacts using the contact details below. We will not charge you for giving effect to your request and we will take all reasonable steps to meet your request at the earliest possible opportunity.

2.9 Updating your Personal Information

It is important that the personal information we hold about you is accurate and up to date. During the course of our relationship with you we will ask you to inform us if any of your personal information has changed.

If you consider that any information we hold about you is incorrect, you should contact us to have it updated. We will generally rely on you to assist us in informing us if the information we hold about you is inaccurate or incomplete.

2.10 Access to your Personal Information

We will provide you with access to the personal information we hold about you, subject to limited exceptions in the Privacy Act as outlined below. You may request access to any of the personal information we hold about you, at any time.

To access personal information that we hold about you, use the contact details specified below. We do not charge a fee for retrieving and supplying the information to you.

2.11 Denied access to Personal Information

There may be situations where we are not required to provide you with access to your personal information. For example, information relating to an existing or anticipated legal proceeding with you, or if your request is vexatious.

An explanation will be provided to you if we deny you access to the personal information we hold.

2.12 Business without identifying you

In most circumstances it will be necessary for us to identify you in order to successfully do business with you, however, where it is lawful and practicable to do so, we will offer you the opportunity of doing business with us without providing us with personal information. Such a situation would be where you make general inquiries about our products.

2.13 How safe and secure is your Personal Information that we hold?

We will take reasonable steps to protect your personal information, including your credit-related personal information, by storing it in a secure environment and limiting access to those appropriately authorised. When the information is no longer needed for any purpose for which the information may be used or disclosed, it will be destroyed or permanently de-identified.

We will also take reasonable steps to protect any personal information from misuse, loss and unauthorised access, modification, or disclosure.

2.14 Further information

You may request further information about the way we manage your personal information or lodge a complaint by contacting our Privacy Officer using the contact details below.

2.15 Contact details

You can contact us by calling us on +61 2 9009 5558, emailing plenaryfundsmanagement@plenary.com or by writing to:

Attn: Privacy Officer
Plenary Funds Management Pty Ltd
Rialto Tower South
Level 43, 525 Collins Street
Melbourne VIC 3000

2.16 Change in our Privacy Policy

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 practices.

As a consequence, we may change this Privacy Policy from time to time or as the need arises.

This Privacy Policy was last updated on **18 November 2021**.