

Privacy Policy

At Landen Funds AFSL Ltd ABN 85 662 073 967 (AFSL 548392) (referred to as "Landen Funds," "we," "us," or "our"), we are committed to protecting the privacy and security of your personal information associated with the product or service you are pursuing. This Privacy Policy outlines how we collect, use, disclose, and store your personal information in compliance with the *Privacy Act 1988 (Cth)* (Privacy Act) and the Australian Privacy Principles.

What if you don't provide information to us?

If you do not provide us with some or all the information that we ask for, we may not be able to render services to individuals engaged with Landen Funds, including functions like registry services, account management, and the distribution of investor holding and distribution statements.

Your Consent to this Privacy Policy

Should you choose to apply for, accept any of the products or services provided by Landen Funds, or otherwise provide us with your personal information, you consent to your information being collected and used in accordance with the provisions set forth in this Privacy Policy.

What personal information do we collect from you?

We collect your personal information to render services to individuals engaged with Landen Funds. To do this effectively, we need to collect certain personal information. This can include a broad range of information from your name, address, contact details and age to information about your personal affairs including:

- A certified copy of a driver's license and/or passport or other identification documentation, serving the purpose of identity verification and compliance with the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)* (AML/CTF Act), as well as other legislation and regulations concerning identity verification, tax reporting, and compliance.
- Tax file numbers and banking details for the administration of investor accounts, tax reporting, and withholding.
- Details regarding investor contributions and investment preferences.
- Information about authorised signatories.
- Photographic images and video recordings.
- Detailed contact information pertaining to a financial adviser.
- Certified copies of any applicable trust deeds, partnership agreements, or constitutions, which may be necessary to meet the requirements of the AML/CTF Act.
- Details encompassing your income, indebtedness, and assets.
- Additional information associated with the product or service you are pursuing, or the association between you and Landen Funds, such as your occupation, as well as your professional experience and qualifications.

In certain circumstances, it might also become imperative to acquire additional particulars. These could encompass information concerning powers of attorney, matters related to probate and estate administration, and details pertaining to beneficial owners or affiliated entities.

Sensitive Information

Sensitive information encompasses data or judgments concerning an individual's racial or ethnic background, political viewpoints, religious convictions, sexual orientation, or criminal history, provided that such information or judgments align with the broader description of personal information. We will ONLY gather sensitive information with your explicit consent and only as required in order to provide to you our product or services.

How do we collect personal information from you and in certain circumstances about you from third parties?

We collect your personal information through Landen Funds application forms, website enquiry forms, telephone and electronic communications and from maintaining records of information provided in the course of ongoing communications.

We may also obtain information from other sources. Whenever feasible, we will gather information regarding individuals directly from the individuals themselves.

Contacting us

Investor Service (Monday – Friday, between 9:30am to 5:30pm (AEST))

☎ 1300 526 336 (Australia Only)

✉ funds@landen.com.au

🌐 www.landen.com.au

📍 Level 3, Suite 303, 7-9 Irvine Place, Bella Vista NSW 2153

Nonetheless, there may be circumstances when it becomes essential to procure information about individuals from external sources, including but not limited to:

- Financial advisers / Introducer.
- Authorised representatives, such as executors or administrators.
- Suppliers or consultants.
- Providers of identification verification services.

How do we store and protect your personal information?

We strive to maintain the relevance, accuracy and completeness and currency of the personal information we hold and to protect its privacy and security. We keep personal information only for as long as is reasonably necessary for the purpose for which it was collected or to comply with any applicable legal reporting or document retention requirements.

We hold the information we collect from you both electronically, via secure IT servers and cloud storage (located in Australia), and physically. When your file is archived, it is sent to an external data storage provider for a period of time. We only use storage providers in Australia who are also regulated by the Privacy Act.

We will ensure that your information is safe from misuse, loss and unauthorised access, modification, or disclosure by using secure passwords, user log-ons or other security procedures, including network fire walls, encryption, physical security, and the implementation of company-wide information security policies. Developments in security and encryption technology are reviewed regularly.

How do we use your personal information?

Unless you are informed otherwise, the personal information we hold is used for establishing and managing your relationship with Landen Funds and giving you ongoing information or opportunities that we believe may be relevant to your financial needs and other circumstances.

From time to time, Landen Funds works with corporate partners and other third-party providers to promote and/or market its business services. Landen Funds may disclose personal information that is collected to these partners or other firms that perform services on behalf of Landen Funds in connection with maintaining or servicing its clients or processing requests for products or services offered by Landen Funds.

Mandatory disclosure of personal information

In adherence to legal requirements, there are circumstances under which we may be compelled to divulge your personal information. These instances may necessitate the sharing of details with various entities, including but not limited to:

- Australian Government regulatory bodies such as the Australian Securities and Investments Commission (ASIC), Australian Tax Office (ATO), Australian Transaction Reports and Analysis Centre (AUSTRAC), and other regulatory or governmental authorities.
- The Australian Financial Complaints Authority (AFCA).
- Compliance with court-issued orders.
- Regulatory or governmental entities situated outside of Australia, should the need arise.
- Disclosure to your spouse in accordance with the requisites of the Family Law Act 1975 (Cth).
- Other regulatory or governmental entities outside of Australia.

Account Management Requirements for Landen Funds

To effectively address the requirements and render services to individuals engaged with Landen Funds, including functions like registry services, account management, and the distribution of investor holding and distribution statements, it may become essential to divulge information or grant access to external service providers, including but not limited to:

- Sharing pertinent information with investment managers to gain a more comprehensive understanding of the investor demographics within the funds

under their administration and to facilitate services for the Landen Funds, which may encompass activities associated with target market assessments.

- Providing information to organisations actively involved in offering, overseeing, or administering Landen Funds product systems or services. These entities may encompass custodians, mail houses, as well as software and information technology providers.
- Sharing data with auditors, consultants, and other professional advisors for the purpose of auditing and consulting.
- Disclosure to appropriate advisors, including those specialising in financial, legal, or other consultancy services, as necessitated.
- Providing information to legal personal representatives, attorneys, or other authorised individuals who possess entitlements to receive the proceeds from an individual's investment or account with Landen Funds.
- Sharing information with other financial institutions that maintain accounts in the name of investors, particularly in scenarios involving the transfer of funds to or from these accounts.
- Disclosure to authorities tasked with investigating, or potentially investigating, suspected fraudulent or suspicious transactions associated with an investment or account.
- Providing information to lenders.

Market Research

We may also furnish certain information to market research firms for the explicit purpose of conducting an analysis of our clientele. We might provide your contact details to these market research entities to conduct research on our behalf. These agencies are obligated to either return such information to us, dispose of it, or retain it in compliance with the Privacy Act. It's important to note that we maintain ownership of this information, and we will seek your consent if you do not wish to partake in market research.

Non-Sale of Client Information

We affirm that information concerning you or your association with Landen Funds shall not be marketed or sold to any external entity, individual, or collective entity under any circumstances.

Disclosure to Overseas Recipients

- Landen Funds may be obligated to disclose personal information to data verification processors situated in the United Kingdom. It is essential to acknowledge that these data processors have entered into contractual agreements to adhere to *Australian Privacy Law* and maintain compliance with *ISO 27001* (Data Security Management Systems). Landen Funds is committed to taking reasonable measures to ensure that any overseas recipient handles such personal information in a manner consistent with the *Australian Privacy Principles*.

How can you check, update or change the information we are holding about you?

You may ask us for access to your personal information and to correct it at any time. Upon receipt of enough information to allow us to identify the information, we will tell you what personal information we hold about you. We will also correct, amend or delete your personal information if we agree it is inaccurate, irrelevant, out of date or incomplete.

Landen Funds will acknowledge access and correction requests within 7 days and fulfil them:

- Within 7 - 14 business days for straightforward requests; and
- Within 30 business days for complex requests.

To access or correct your personal information, please write to Privacy Officer funds@landen.com.au.

The making of requests for access is at no cost to you, however, we may charge a reasonable fee to cover costs associated with providing you access.


In some limited situations, we may need to refuse access to your information or refuse a request for correction. We will advise you as soon as possible after your request if this is the case and the reason/s for our refusal.


What happens if you want to complain?

- Landen Funds Privacy Officer, will investigate and subsequently determine the course of action required to address the complaint.
- We will issue a written notification regarding our determination, typically within a **30-day** timeframe. If the determination proves unsatisfactory or if

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you believe we have breached one or more of the Australian Privacy Principles (APP), the complainant has the option to contact us to discuss their concerns, and further, they may choose to escalate the complaint directly to the Office of the Australian Information Commissioner at:

Website: <https://www.oaic.gov.au/contact-us>

Phone: 1300 363 992 Monday to Thursday (10 am to 4 pm (AEST/AEDT))

Post: GPO Box 5288, Sydney NSW 2001

Updating the Privacy Policy

This Privacy Policy was prepared on 26 August 2024.

We may update this Privacy Policy from time to time. An up-to-date version of this Privacy Policy will be available as outlined below:

Accessibility of the Privacy Policy

To obtain a copy of our current Privacy Policy (this document), we offer it free of charge through the following means:

- You may request a copy to be sent via email by sending your request to funds@landen.com.au.
- You can reach out to us by telephone and request a copy to be mailed or emailed to you by dialling **1300 526 336**.
- You have the option to write to us and request a copy to be mailed or emailed to you. Our postal address is as follows:

Landen Funds AFSL Ltd
Suite 303, Level 3
7-9 Irvine Place
BELLA VISTA NSW 2153

Should you prefer a specific format for this Privacy Policy (for instance, in audio format), please contact us using the provided telephone number or postal address, and we will make reasonable accommodations to fulfill your request.

Inquiries

Should you have any additional inquiries regarding this Privacy Policy or any concerns pertaining to how we have managed your personal information, please feel free to:

- Reach out to us via email at funds@landen.com.au.
- Contact us by phone at **1300 526 336**.
- Send us a written correspondence to Suite 303, Level 3, 7-9 Irvine Place, BELLA VISTA NSW 2153