

Arcana Capital Pty Ltd – Privacy Policy

Arcana Capital (Arcana) is bound by the Privacy Act, its Amendment (Enhancing Privacy Protection) Act, and its Privacy Amendment (Notifiable Data Breaches) Act and will protect your personal information in accordance with the Australian Privacy Principles. These principles govern how we can collect, use, hold and disclose your personal information when you invest with us in one, or multiple, Managed Investments Schemes (MIS), and how we respond when a data breach is likely to result in serious harm to any investors whose personal information is involved in the breach.

What kinds of personal information do we collect and hold?

When you apply for an interest in any of our MIS we may collect information that is necessary to process your investment application and for the purposes of administering your ongoing participation in the scheme.

For instance, we may ask for identification information such as your name, address and date of birth for the purposes of complying with the Federal Government's Anti Money Laundering-Counter Terrorism Financing Legislation (AML/CTF).

We may ask for your investing entities Tax File Number (TFN) to ensure that you are not taxed unnecessarily by the MIS.

Why do we collect, hold, use and disclose personal information?

The main reason we collect, use, hold and disclose personal information is so we can service your application and manage your participation in our MIS. This may include, but is not limited to:

- Confirming your identity for AML/CTF requirements;
- Checking your eligibility to invest in an Arcana Capital MIS;
- Processing your investment application;
- Ensuring that income distributions are paid into your correct bank account;
- Providing you information about the status of your investment in an MIS;
- Helping you manage your interests in one or multiple MIS; and
- Assisting you to call a meeting of fellow investors in an MIS.

How do we collect personal information?

We collect most personal information directly from you. Sometimes we collect personal information about you from other people such as publicly available sources of information. For example, the Australian Securities & Investment Commission (ASIC).

How do we hold personal information?

The personal information we hold is stored electronically in encrypted files on our own server, a data centre in Australia and in paper files, secured by us at our offices. We use a range of security measures to protect the personal information we hold.

Information on the performance of Arcana's MIS along with investor specific information, such as distribution statements, is stored electronically via Citrix Systems in the secure portal facilitated by our accountants William Buck.

Who do we disclose your personal information to, and why?

Sometimes we may disclose your personal information to organisations outside Arcana Capital. For example, with the accountants and auditors of the MIS, so that they may perform their duties for the Fund.

In the instance where an investor seeks to call a meeting of investors in a particular MIS we will provide your contact details so that they may contact you, and other investors, for the express purpose of arranging the meeting.

Who do we notify when there is a data breach of your personal information?

In accordance with the Notifiable Data Breaches scheme under the Privacy Act, we are obliged to notify investors whose personal information is involved in a data breach that is likely to result in serious harm (these are referred to as 'eligible data breaches'). This notification must include recommendations about the steps investors should take in response to the breach. The Australian Information Commissioner (Commissioner) must also be notified of eligible data breaches.

In summary, subject to certain exemptions, the scheme requires us to:

- carry out a reasonable and expeditious assessment if there are reasonable grounds to suspect that there may have been an eligible data breach (and to take reasonable steps to complete that assessment within 30 days); and
- make the prescribed notifications (to the Commissioner and if practicable to affected investors) as soon as we are aware that there are reasonable grounds to believe that there has been an eligible data breach. The notifications must include a description, the kinds of information concerned and recommendations about the steps investors should take in response to the data breach.

Do we disclose personal information overseas?

No – Arcana Capital does not disclose information to recipients located outside Australia.

Do we use or disclose personal information for marketing?

We may use your personal information to offer you opportunities in future MIS that we believe may interest you. We will not do this if you tell us not to.

If you don't want to receive marketing offers, please contact us on the details listed at 'Contact us'.

Access to and correction of personal information

You can request access to the personal information we hold about you. You can also ask for corrections to be made. To do so, please contact us on the details listed at 'Contact us'.

Resolving your privacy concerns and complaints - your rights

If you are concerned about how your personal information is being handled or if you would like to make a complaint, please contact us on the details listed at 'Contact us'.

If you are unhappy with our response, there are regulatory bodies you can go to such as the Office of The Australian Information Commissioner:

<https://www.oaic.gov.au/>

Contact us

If there is anything you would like to discuss, please contact us.

If you have any questions or concerns about our privacy policy or practices, please contact:

Peter Eccleston – Director-Investor Relations

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This information is provided for information only. It does not constitute an offer or invitation to enter into any legal agreement of any kind for units in our MIS.

Arcana Capital Pty Ltd AFSR 1245173, ACN 609 576 623, is an Authorised Corporate Representative of Arcana Capital Funds Management Pty Ltd AFSL 518744, ACN 633 164 155.