



# Privacy Policy

248 Growth Partners as the trading name of 248 GP Managers Pty Ltd, and each of its related bodies corporate (as that term is defined in section 50 of the *Corporations Act 2001* (Cth)) (individually and collectively, **248 Growth Partners/we/us/ours**) respect the privacy of our investors and other people we do business with, and we strive to comply with the Australian Privacy Principles (**APPs**) contained in the Privacy Act 1988 (**the Privacy Act**). This Privacy Policy outlines how we will handle personal information.

Our Privacy Policy is divided into the following sections:

- How and why 248 Growth Partners collects personal information
- Will your personal information be given to anyone else?
- How is your personal information stored?
- Your right of access and correction
- Online collection of personal and non-personal information
- Additional Privacy information & How to contact 248 Growth Partners

## 1. How and why 248 Growth Partners collects personal information

We need to collect personal information to provide investment management services and operate our business.

- **Investors:** We obtain personal information about our investors either directly or through our registry service provider. This information is collected directly from our investors or their representatives. The information collected is necessary to process applications to invest in our investment products, maintain investments, deal with investor queries and to comply with relevant laws (for example anti-money laundering and counter terrorism financing laws). The type of information collected includes, but is not limited to, names, contact details, date of birth, bank details and tax file numbers.
- **Business contacts:** We may collect personal information from people we do business with in order to fulfil the relevant business purpose. This will usually happen when we collect the name and business contact details of a person who is the contact in a government agency or company we deal with, or in one of our contractors or suppliers.
- **Website users:** We may also collect personal information through our website (for example, if you e-mail [contact@248partners.com.au](mailto:contact@248partners.com.au) with a question). The information collected is necessary to answer queries and facilitate the operation of the website. See *Online collection of personal and non-personal information* below for more information. Information that may be collected includes name and contact details.
- Our policy is only to use personal information collected for the business purpose for which it was collected or related purposes which would reasonably be expected. We may from time to time also use your personal information to inform you of investment opportunities or to provide information about products and services that may be of interest to you. However, we do respect your right to ask us not to do this. We may not be able to provide you with the products or services you are seeking if you do not provide us personal information, it is incomplete or incorrect. We do not collect personal information that we do not need. We do not typically collect any “sensitive information” or “health information” as defined by the Privacy Act. Where we receive personal information which we did not ask for, we will, within a reasonable period of time, determine whether the information it could have collected the information lawfully under APPs. If not, we will destroy the information and de-identify it where it is otherwise lawful to do so. Otherwise, the information will be subject to this privacy policy.

## 2. Will your personal information be given to anyone else?

We will not sell, rent or trade personal information to or with others. Personal information collected by us may be disclosed within the 248 Growth Partners group and third parties to whom we outsource specialised functions (such as our registry, mailing houses or printing companies), and if so, we take steps to ensure that those parties:

- do not breach the APPs when they handle personal information (regardless of whether they are a small business, and would otherwise be exempt from the APPs);
- and are authorised only to use personal information in order to provide the services or to perform the functions required by us. The only other time we would make disclosures of personal information is to your representative, if we are required to do so by law, or if the disclosure is permitted under the Privacy Act. We are unlikely to disclose information to any overseas entity, however if we do, we will comply with the requirements set out above.

## 3. How is your personal information stored?

We take physical, electronic and managerial steps to ensure that the personal information we hold is secure from unauthorised access, destruction, use, modification or disclosure. We only permit personal information to be accessed by authorised personnel, and we educate our staff about their responsibilities under the APPs. We have procedures in place to ensure that any identified or suspected data breaches are dealt with promptly and appropriately. In accordance with the Privacy Act, we will report certain data breaches to both affected individuals and the Office of the Australian Information Commissioner. Data breaches we will report are those which are likely to result in serious harm to an individual whose personal information was part of the data breach.

## 4. Your right of access and correction

Under the Privacy Act, you have the right to seek access to information which we hold about you (although there are some exceptions to this). You also have the right to ask us to correct information, which is inaccurate, incomplete or out of date. If you wish to exercise your right under the Privacy Act to seek access to the personal information that we hold about you, or if you believe that personal information about you is not accurate, complete or up to date, you should contact us, including the details of your request. Our contact details can be found at the end of this Privacy Policy. Please note that the personal information we hold about you will be information that you (or your representative) have provided. We may ask you to pay the reasonable costs of responding to your request. Our policy is to respond to requests for access or correction within a reasonable time.

## 5. Online collection of personal and non-personal information

Our website automatically collects other information when you visit our website. For example, for each visitor to our website, our server automatically recognises and stores the visitor's domain name, but not their email address. Our website also uses cookies. Most web browsers are set by default to accept cookies. However, if you do not wish to receive any cookies you may set your browser to either prompt or refuse cookies, but this may mean you cannot access all the features of the website. We use cookies for tracking the statistics about the use of our website. This allows us to improve the layout and functionality of our website. This tracking is conducted in such a way as to ensure the anonymity of visitors. The cookie may identify your computer, but it should not identify you. Our website contains links to other websites, for your convenience and information. When you access a website other than our website, please understand that we are not responsible for the privacy practices of that site. We suggest that you review the privacy policies of each site you visit.

## 6. Additional privacy information & how to contact us

We may change this Privacy Policy at any time. We will make this Privacy Policy available to anyone who requests it, either at our offices or through our website. For further information about privacy issues, see the Office of the Australian Information Commissioner's website at [www.oaic.gov.au](http://www.oaic.gov.au). If you have a complaint about relating to the privacy of your personal information or about a breach of the APPs, please write to us at the address below. We will acknowledge complaints immediately and will investigate complaints and provide a final response within 30 days of receipt of the complaint.

If you have a privacy concern, complaint, or query, please contact +61 2 9087 8000, [contact@248partners.com](mailto:contact@248partners.com) or by mail at:

**Privacy Officer**  
**248 Growth Partners**  
**Level 27, 20 Bond Street**  
**SYDNEY NSW 2000**  
**Australia**

Our registries perform the primary function of collecting personal information from investors in our investment products. For information regarding how our registries handle personal information, see <https://boardroomlimited.com.au/> or <https://www.oneregistryservices.com.au/> for their Privacy Policies.