

# Privacy Policy

## 1. About this policy

Rajomon respects privacy and is committed to protecting personal information. This Privacy Policy explains how personal information is collected, held, used, disclosed and protected in connection with our business, products, services, website, investor portal, application processes, communications and legal and regulatory obligations.

In this Privacy Policy, Rajomon, we, us or our means, as applicable:

- Rajomon Capital Limited ACN 600 237 625, AFSL 465579;
- Rajomon Asset Management Pty Ltd ACN 654 721 043;
- Rajomon Pty Ltd ACN 640 689 498; and
- any related body corporate or related entity of those entities.

This Privacy Policy also applies where personal information is handled by our officers, employees, contractors, consultants, agents, authorised representatives, delegates or service providers acting for or on behalf of Rajomon.

This Privacy Policy applies to personal information handled by Rajomon in connection with our business, products and services, including our funds, investment products, investor services, application processes, website, investor portal, communications and related business activities.

This Privacy Policy should be read together with any relevant product disclosure statement, additional information document, target market determination, application form, investor portal terms, website terms, AML/CTF notice or other document issued by the relevant Rajomon entity.

By dealing with Rajomon, using our website or investor portal, applying for an investment, or otherwise providing personal information to us, you acknowledge that your personal information will be handled in accordance with this Privacy Policy.

## 2. Our privacy obligations

We handle personal information in accordance with the Privacy Act 1988 (Cth), the Australian Privacy Principles and other applicable laws. Depending on the circumstances, we may also handle information under laws and obligations relating to financial services, managed investment schemes, corporations law, anti-money laundering and counter-terrorism financing, taxation, trust law, data security, record keeping, audit, compliance, regulatory reporting and dispute resolution.

Where we are required or authorised by law to collect, use, retain or disclose personal information, we may do so without seeking separate consent.

## 3. What personal information we collect

The personal information we collect depends on who you are, how you deal with us and the product, service or activity involved. Personal information may include information you provide directly to us, information generated through your dealings with us, information collected through our website or investor portal, and information collected from third parties where permitted by law.

We may collect identity and contact information such as your name, date of birth, residential address, postal address, email address, telephone number, occupation, citizenship, residency status, tax residency status, signature, investor number, adviser details and platform details.

For investors and applicants, we may collect investment and financial information, including application details, investor type, investment amount, investment option selection, distribution elections, withdrawal or transfer details, transaction history, bank account details, source of funds, source of wealth, tax file number, Australian business number, FATCA and CRS information, application responses, target market assessment information, wholesale or sophisticated investor information, account statements, tax statements and other information relating to your holding, instructions or transactions.

Where an investor or applicant is a company, trust, SMSF, partnership or other entity, we may collect information about directors, trustees, members, partners, beneficiaries, beneficial owners, controllers, authorised signatories, attorneys, agents, representatives, ownership structures and control arrangements.

We may also collect information required for identity verification, AML/CTF, sanctions screening, fraud prevention, regulatory compliance and risk management. This may include identity documents, passport details, driver licence details, Medicare card details where relevant, certified documents, electronic verification outcomes, politically exposed person screening information, sanctions screening information, beneficial ownership information and other know-your-customer information.

When you use our website, investor portal or digital services, we may collect technical information such as IP address, browser type, device type, pages accessed, login activity, portal activity, authentication activity, cookies, usage data, security logs and error logs.

We generally do not seek to collect sensitive information unless it is reasonably necessary for our business, required or authorised by law, or collected with your consent. We may collect information that is subject to specific legal protections or handling requirements, such as tax file numbers, government identifiers, identity verification information and other information required for AML/CTF, tax, compliance or regulatory purposes.

#### **4. How we collect personal information**

We may collect personal information directly from you when you complete an application form, invest, withdraw, transfer an investment, access the investor portal, provide instructions, contact us, attend a meeting, subscribe to updates, provide documents, make a complaint or otherwise deal with Rajomon.

We may also collect personal information from third parties where permitted by law, including financial advisers, platform operators, accountants, lawyers, auditors, custodians, administrators, registry providers, identity verification providers, AML/CTF screening providers, public registers, government databases, regulators, counterparties, related entities, authorised representatives, consultants, brokers, introducers and other service providers.

Where you provide personal information about another person, you must ensure that you are authorised to do so and that the person has been made aware of this Privacy Policy.

#### **5. Why we collect, use and disclose personal information**

We collect, hold, use and disclose personal information so that we can operate our business, provide and administer our products and services, meet our legal and regulatory obligations, and manage risk, governance and investor communications.

This may include using personal information to process and assess applications, assess whether an applicant is eligible to invest, assess whether a product is likely to be consistent with its target market determination, establish and maintain investor accounts, administer investments, issue units or interests, process distributions, reinvestments, withdrawals, redemptions, transfers and other transactions, provide statements, reports, confirmations and tax information, verify identity, conduct AML/CTF checks, conduct sanctions screening and politically exposed person screening, monitor transactions and prevent financial crime.

We may also use personal information to communicate with investors, advisers, platforms and representatives, respond to enquiries, instructions and complaints, manage relationships with custodians, administrators, registry providers, auditors, advisers, platforms and other service providers, maintain and improve our website, investor portal, systems, processes and controls, perform audit, compliance, governance, risk management and reporting functions, manage conflicts, related party arrangements and operational risk, and conduct product governance, data analysis, system testing, service improvement and business planning.

We may also use and disclose personal information to comply with legal, regulatory, tax, accounting and reporting obligations, respond to ASIC, AUSTRAC, ATO, OAIC, AFCA, courts, tribunals, regulators, law enforcement bodies and government agencies, detect, prevent, investigate and respond to fraud, scams, cyber incidents, unlawful activity, misconduct or misuse of our systems, and protect our rights, property, investors, officers, employees, service providers and systems.

Where practical, we may use aggregated, de-identified or anonymised information for reporting, analytics, testing, product governance, service improvement and business planning.

#### **6. AML/CTF, identity verification and tax information**

Rajomon may be required to collect and verify information about investors, applicants, beneficial owners, controllers, trustees, directors, authorised representatives and other relevant persons. We may use electronic verification services, identity verification providers, databases, public sources, government records and screening tools to verify identity, assess risk, conduct sanctions screening, identify politically exposed persons and comply with AML/CTF obligations.

Where electronic identity verification is used, information from identity documents may be transmitted securely to an identity verification provider or issuing authority. We may retain the verification result, reference number, timestamp or audit record for compliance, audit and regulatory purposes.

We may also collect tax file numbers, Australian business numbers, tax residency information and other tax-related information where required or authorised by law. Providing a tax file number is not compulsory; however, if you do not provide it and no exemption applies, tax may be withheld from distributions, payments or other amounts at the rate required by law.

We may collect information to determine whether you are a tax resident of Australia or another jurisdiction, including for FATCA, CRS and other tax reporting purposes.

#### **7. Target market and application assessment**

Where Rajomon issues, distributes, manages or administers financial products, we may collect and use personal information to support product governance, application assessment, target market assessment and distribution controls. This may include

information collected through application forms, investor declarations, adviser confirmations, platform data, transaction records and investor communications.

We may use this information to assess applications before acceptance, identify incomplete or inconsistent information, request further information, delay or reject applications, monitor distribution arrangements, review product design and distribution settings, comply with design and distribution obligations and respond to regulatory enquiries.

#### **8. What happens if information is not provided**

If you do not provide information requested by us, or if the information you provide is incomplete, inaccurate or unclear, we may not be able to process your application, accept you as an investor, administer your investment, pay distributions, process withdrawals or transfers, provide access to the investor portal, verify your identity, provide statements or tax information, act on your instructions or comply with our legal and regulatory obligations.

In some circumstances, we may delay, reject, suspend or refuse an application, instruction, transaction, payment, withdrawal, redemption or transfer where required or permitted by law, our compliance procedures or the terms of the relevant product.

#### **9. Who we disclose personal information to**

We may disclose personal information where reasonably necessary for our business, products, services, legal obligations or operational purposes. This may include disclosure to Rajomon entities, responsible entities, investment managers, trustees, custodians, administrators, registry providers, fund accountants, auditors, professional advisers, technology and cloud service providers, identity verification and AML/CTF screening providers, payment providers, banks, platform operators, financial advisers, communication providers, regulators, law enforcement bodies, courts, tribunals, government agencies and other persons where you have consented or where disclosure is required or permitted by law.

We may also disclose personal information to prospective or actual purchasers, investors, assignees or counterparties in connection with a business transaction. We do not sell personal information.

#### **10. Service providers and outsourcing**

We may use external service providers to perform functions on our behalf, including administration, registry, custody, fund accounting, audit, legal, tax, compliance, technology, identity verification, AML/CTF screening, communications, payment processing, document execution, cybersecurity, data storage, analytics and business support.

Where we use service providers, we take reasonable steps to ensure that personal information is handled appropriately, including through contractual, operational and security arrangements where relevant.

#### **11. Direct marketing and investor communications**

We may use your personal information to send you information about Rajomon, our products and services, funds, investment updates, market updates, events, investor communications and business updates. We may contact you by email, telephone, SMS, post, portal notification or other electronic means.

You may opt out of marketing communications at any time by using the unsubscribe function, contacting us or updating your communication preferences where available. Even if you opt out of marketing communications, we may still send you important service, transaction, regulatory, legal, tax, product, security or account-related communications.

We do not provide your personal information to other organisations for their own direct marketing purposes.

#### **12. Website, cookies and investor portal**

Our website, investor portal and digital services may use cookies, pixels, analytics tools, log files and similar technologies to operate the website and investor portal, maintain security, authenticate users, remember preferences, analyse usage, improve functionality, monitor performance, detect errors, prevent fraud or misuse, support investor communications and manage marketing activity.

We may use trusted third-party tools, including analytics, advertising, communication, security and verification tools, to support these activities. These tools may collect information such as IP address, browser type, device information, pages visited, usage patterns and interaction data.

You can manage cookies through your browser settings, although disabling cookies may affect the functionality of our website, investor portal or digital services.

Our website, emails or digital services may contain links to third-party websites. Those websites are not controlled by Rajomon and are not covered by this Privacy Policy.

We may use social media platforms to provide general information, communicate with the public and promote our business. You should not post confidential, account-specific or sensitive personal information publicly on social media platforms.

### **13. Overseas disclosure**

Some of our service providers, systems, technology providers, cloud providers, verification providers, support providers or related parties may be located outside Australia or may store, process or access information from outside Australia. The countries in which information may be stored, processed or accessed may change over time depending on our service provider and technology arrangements.

Where we disclose personal information overseas, we will take reasonable steps to ensure that the information is handled in a manner consistent with applicable Australian privacy obligations, unless an exception applies.

### **14. Security and retention**

We may hold personal information in physical and electronic form, including in internal systems, cloud systems, registry systems, investor portal systems, email systems, databases, document management systems, compliance systems and archived records.

We take reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, unauthorised modification and unauthorised disclosure. These steps may include access controls, authentication controls, password protection, multi-factor authentication where appropriate, encryption where appropriate, secure document storage, system monitoring, cybersecurity controls, staff training, confidentiality obligations, service provider due diligence, physical security controls, record management processes, incident response procedures and data retention and destruction processes.

No method of transmission or storage is completely secure. You should take care when sending information electronically and notify us promptly if you believe your information, account, portal access or communications with us have been compromised.

We retain personal information for as long as reasonably necessary for the purposes for which it was collected, including to administer investments, maintain records, comply with legal and regulatory obligations, resolve disputes, respond to enquiries, manage risk and protect our legal interests. When information is no longer required, we will take reasonable steps to destroy it, delete it or de-identify it, subject to our legal, regulatory, operational and record keeping obligations.

### **15. Data breaches**

Rajomon maintains procedures for responding to suspected or actual data breaches. If we become aware of a suspected data breach, we will assess the incident and take appropriate steps, which may include containment, investigation, remediation, notification and reporting.

Where a data breach is likely to result in serious harm and is not otherwise remedied, we will notify affected individuals and the Office of the Australian Information Commissioner where required by law.

### **16. Accessing and correcting your personal information**

You may request access to personal information we hold about you by contacting our Privacy Officer. Before providing access, we may require you to verify your identity. We will respond to access requests within a reasonable period and aim to provide access within 30 days where practicable.

We may refuse access in certain circumstances permitted by law, including where access would unreasonably affect another person's privacy, prejudice legal proceedings or negotiations, reveal commercially sensitive information, pose a security risk, be unlawful, be frivolous or vexatious, prejudice enforcement or regulatory activities, or otherwise fall within an exception under applicable law. Where we refuse access, we will provide reasons where required by law. We may charge a reasonable fee for giving access where permitted by law, but we will not charge you for making an access request.

We aim to ensure that personal information we hold is accurate, complete and up to date. You should notify us promptly if your personal information changes or if you believe information we hold is incorrect, incomplete, out of date or misleading. We may ask you to provide supporting information before making a correction, and where available, you may also update certain personal information through our investor portal or by contacting us.

### **17. Anonymity and authorised representatives**

Where lawful and practicable, you may interact with us anonymously or using a pseudonym. However, due to the nature of our business and legal obligations, anonymity or pseudonymity will usually not be available where you wish to apply for an investment, invest in a product, access investor services, receive payments, transact, use an investor portal, make formal instructions, receive statements or tax information, or deal with us in circumstances where we are required to identify you.

You may appoint another person to deal with us on your behalf, such as a financial adviser, accountant, lawyer, attorney, authorised representative, platform operator, trustee, director or signatory. We may collect, use and disclose personal information to such persons where we reasonably believe they are authorised to act for you, where you have consented, where it is necessary to administer your

investment, or where required or permitted by law. You must notify us promptly if an authorised person's authority changes or is revoked.

## **18. Information about other individuals**

If you provide us with personal information about another individual, including a director, trustee, beneficiary, member, beneficial owner, controller, authorised signatory, attorney, adviser, employee or representative, you must ensure that you are authorised to provide the information, the information is accurate and complete, the individual has been made aware that their information has been provided to Rajomon, and the individual has been made aware of this Privacy Policy.

## **19. Privacy complaints**

If you have a concern or complaint about how we have handled your personal information, you may contact our Privacy Officer. Complaints should be made in writing and should include sufficient detail to allow us to understand and investigate the matter.

We will acknowledge your complaint within a reasonable period, may request further information, and will aim to respond within 30 days. If we require more time, we will let you know.

You may contact Rajomon's Privacy Officer using the details below. Privacy requests and complaints addressed to Rajomon will be directed internally to the appropriate team.

### *Privacy Officer*

Telephone: (03) 9699 9154  
Email: [info@rajomon.com.au](mailto:info@rajomon.com.au)  
Website: [www.rajomon.com.au](http://www.rajomon.com.au)  
Mail: PO Box 61, South Melbourne VIC 3205

If you are not satisfied with how we handle your privacy complaint, you may contact the Office of the Australian Information Commissioner. If your complaint relates to a financial service or financial product and falls within its jurisdiction, you may also be able to contact the Australian Financial Complaints Authority.

### *Office of the Australian Information Commissioner*

Website: [www.oaic.gov.au](http://www.oaic.gov.au)  
Telephone: 1300 363 992  
Mail: GPO Box 5288, Sydney NSW 2001

## **20. Changes to this Privacy Policy**

We may update this Privacy Policy from time to time to reflect changes in our business, products, services, systems, legal obligations, regulatory requirements or privacy practices. The Privacy Policy is available on our website or on request.

Last updated: July 2026