

Policy
Privacy
Legal

Approver's name and title:

Chief Legal Officer

Review date:

Effective date:

October 2025

Classification



Privacy Policy

We treat personal data provided to us with respect and integrity. We are committed to protecting your privacy and it is important that you understand how we look after your personal data and how we make sure that we meet our legal obligations to you under privacy and data protection laws and regulations applicable to the Capella Capital business, including the General Data Protection Regulation (Regulation (EU) 2016/679) and the *Privacy Act 1988* (Cth) (together, the "Data Protection Laws").

This policy describes how we collect and process personal data and how we use and protect your personal data as well as your rights in relation to your personal data. When referring to 'Capella Capital', 'we' or 'us', we mean Sojitz Capella Corporation B.V. and each of its wholly owned subsidiaries who are doing business with you and acting as a controller with respect to your personal data collected or processed in this connection.

This policy applies to all personal data we collect or process about you when doing business with us or providing contact information and other personal data to us. Personal data is information, or a combination of pieces of information, that could reasonably allow you to be directly or indirectly identified.

What personal data do we collect?

We may collect your personal data occur directly (e.g. when you contact us) or indirectly (such as from public registrars, credit research agencies, recruiting agencies and employment screening agencies).

Personal data we collect directly from you

The categories of personal data that we collect directly from you are:

- personal details (e.g. name, date of birth);
- contact details (e.g. company name, phone or mobile number, email address, postal address);
- educational details (e.g. educational history, qualifications, certifications, skills);
- citizenship or immigration information;
- professional experience;
- your marketing preferences, including any consents you have given us; and
- any other information you may choose to provide to us in your dealings with us.

We may be required by law or as a consequence of any contractual relationship we have with you to collect certain personal data from you. In such case, your failure to provide the personal data may prevent or delay the fulfilment of our obligations under the law or the contract.

Personal data we collect from other sources

The categories of personal data that we collect about you from other sources are:

- personal details (e.g. name, date of birth);
- contact details (e.g. phone number, email address, postal address or mobile number);
- background check information;
- publicly available professional profiles on websites or social media (e.g. LinkedIn); and
- information about your creditability or reputation.

Special categories of personal data

To the extent we collect and process any special categories of personal data (e.g. diversity, medical, biometric information), we will separately ask for explicit consent if this is required by law. In this case, you have the right to withdraw your consent to this processing at any time.

In some circumstances, we may have another lawful reason to collect such special categories of personal data, in which case we will inform you of this prior to the processing taking place.

What do we do with the personal data and why?

We use your personal data to:

- perform and enforce any contractual obligation under a contract with us if applicable;
- deal with your enquiries and requests;
- provide and, if applicable, personalise our services you have requested;
- comply with legal or regulatory obligations to which we are subject, including, but not limited to, use in connection with legal claims, compliance and investigative purposes and cooperate with regulators and law enforcement bodies;
- protect our rights and interests as well as the rights and interests of our users and any other person;
- provide and, if applicable, personalise our services you have requested;
- contact you with marketing and offers relating to services offered by us and Sojitz Group Companies (defined in section 'Who do we disclose personal data to?' below) based on statutory provisions or your consent as required by applicable law; and
- personalise the marketing messages we send you to make them more relevant and interesting if applicable.

We must have a legal basis to process your personal data. In most cases the legal basis will be one of the following:

- to fulfil our contractual obligations to you, for example obtaining your contact details and bank account details to provide services, to ensure that invoices are paid correctly, and to ensure you are able to access our premises when required;
- to comply with our legal obligations, for example obtaining proof of your identity to enable us to meet our anti-money laundering and counter-terrorism financing obligations;
- to comply with our legal obligations to you, for example health and safety obligations while you are on our premises or to a third party (e.g. the taxation authorities);
- to meet our legitimate interests, for example to enable us to screen your background for anti-corruption purposes, to understand how you use our services and to enable us to derive knowledge from that enable us to develop new services. When we process personal data to meet our legitimate interests, we put in place robust safeguards to ensure that your privacy is protected and to ensure that our legitimate interests are not overridden by your interests or fundamental rights and freedoms;
- to protect your or another person's vital interests, for example by providing your health information to a doctor in case of a medical emergency situation; and
- when you gave us consent to the processing of your personal data for specific purposes (When the legal basis to process your personal data is based on your consent, you may withdraw your consent ("opt out") at any time by contacting us using the details at the end of this policy. In respect of electronic direct marketing, you can opt out by following the instructions in the communication.)

What rights do you have?

You have a number of rights under the Data Protection Laws in relation to the way we process your personal data, which are set out below. You may contact us using the details set out below to exercise any of these rights. We will respond to your request within one month.

In some instances, we may be unable to carry out your request, in which case we will write to you (again, within one month) to explain why.

1. You have the right to request access to your personal data: You have the right to request confirmation that your personal data is being processed, to request access to your personal data (through us providing a copy) and to be provided with other information about how we process your personal data.
2. You have the right to ask us to rectify your personal data: You have the right to request that we rectify your personal data if it is not accurate or not complete.
3. You have the right to ask us to erase your personal data: You have the right to ask us to erase or delete your personal data where there is no reason for us to continue to process your personal data. This right would apply if we no longer need to use your personal data to provide services to you, where you withdraw your consent for us to process special categories of your personal data, or where you object to the way we process your personal data (see right 6 below).
4. You have the right to ask us to restrict or block the processing of your personal data: You have the right to ask us to restrict or block the processing of your personal data that we hold about you. This right applies where you believe the personal data is not accurate, you would rather we block the processing of your personal data rather than erase your personal data, where we don't need to use your personal data for the purpose we collected it for but may require it to establish, exercise or defend legal claims.
5. You have the right to port your personal data: You have the right to obtain your personal data from us and use it for your own purposes across different services. This allows you to move personal data easily to another organisation, or to request us to do this for you.
6. You have the right to object to our processing of your personal data: You have the right to object to our processing of your personal data where we process your data on the basis of our legitimate interests, unless we are able to demonstrate that, on balance, our legitimate interests override your rights or we need to continue processing your personal data for the establishment, exercise or defence of legal claims.
7. You have the right not to be subject to automated decisions: You have the right to object to any automated decision making, including profiling, where the decision has a legal or significant impact on you.
8. You have the right to withdraw your consent: You have the right to withdraw your consent to our processing of personal data, if consent was the mechanism we used to collect it.
9. You have the right to lodge a complaint with your local data protection authority.

These rights may be limited in some situations – for example, where we can demonstrate that we have a legal requirement to process your personal data. In some instances, this may mean that we are able to retain personal data even if you withdraw your consent.

We encourage you to contact us to update or correct your personal data if it changes or if the personal data we hold about you is inaccurate.

We will contact you if we need additional information from you in order to honour your requests.

If you would like to discuss or exercise such rights, please contact us at the details in the section 'Have a privacy enquiry?' below.

Do we use cookies and similar technology?

We use browser cookies on the Capella Capital website (www.capellacapital.com.au). Browser cookies enable us to collect information about the frequency and length of visits to our website. You can disable the cookie function by viewing your browser tools. We do not collect any personal data about you through this process.

Who do we disclose your personal data to?

We may disclose your personal data to any member our group of entities, and our related entities, for the abovementioned purposes. Sojitz Capella Corporation B.V. is a subsidiary of Sojitz Corporation (1-1, Uchisaiwaicho 2-chome, Chiyoda-ku, Tokyo 100-8691, Japan) and we work with other businesses and companies that fall under Sojitz Corporation ('Sojitz Group Companies'). We may share your personal data with Sojitz Group Companies for marketing purposes, legal compliance purposes, and any other abovementioned purposes. A list of current Sojitz Group Companies with whom personal data may be shared and their locations is available in the following hyperlinks:

- <https://www.sojitz.com/en/corporate/network/> (with respect to entities constituting Sojitz Corporation's operating bases)
- <https://www.sojitz.com/en/corporate/group/> (with respect to entities constituting Sojitz Corporation's major group companies)

We may also disclose your personal data:

- to our professional advisors (including without limitation tax, legal or other corporate advisors who provide professional services to us);
- to our third-party suppliers for business operations, services and administration and IT purposes;
- in the event, or in connection with, a merger or sale involving all or part of our group of entities or business, or as part of a corporate reorganisation or share sale or other change in corporate control to any prospective sellers or buyers of such business or assets;
- in the event of any insolvency situation (e.g. the administration or liquidation) of a member of our group of entities;
- to protect the rights, property, or safety of us, our staff, our customers, or others. This includes exchanging information with other companies and organisations (including without limitation the local police or other local law enforcement agencies or regulatory bodies) for the purposes of staff and customer safety, crime prevention;
- in connection with fraud protection and credit risk reduction; and/or
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation or regulatory requirements, or otherwise for the prevention or detection of fraud or crime.

Because we operate in multiple jurisdictions, the recipients referred to above may be located outside the jurisdiction in which you are located (or in which we provide the services). Refer to the section 'Do we disclosed personal data to other countries?' below for more information.

Do we disclose personal data to other countries?

We may transfer personal data to countries other than the country in which the data was originally collected.

We have and shall put in place appropriate safeguards (such as EU standard contractual clauses) in accordance with relevant Data Protection Laws to ensure that your personal data is adequately protected. For more information, please contact us at the details below.

What do we do to help protect personal data?

We, and our external service providers, take reasonable steps to protect personal data from misuse, interference or loss and unauthorised access, modification and disclosure with appropriate safeguards and security measures and restrict access to those who have a legitimate business purpose and reason for accessing it. We store most data about you in computer systems and databases operated by either us or our external service providers. However, safeguards and security measures apply to personal data in both electronic and hard copy form.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted via the internet; any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access.

We will keep your personal data for as long as we have a relationship with you. Once our relationship with you has come to an end, we will retain your personal data for an appropriate period of time that will enable us to:

- maintain business records for analysis and/or audit purposes;
- comply with record retention requirements under applicable laws and record retention policies;
- defend or bring any existing or potential legal claims; and
- deal with any complaints regarding our services.

We will delete your personal data when it is no longer required for these purposes. We will further delete your personal data when you withdraw your consent, if there is no other legal ground for further processing (e.g., a statutory obligation to retain your personal data), or when you object to the processing in accordance with the section 'What rights do you have?' above, or when we are obligated to delete it in accordance with an obligation under applicable law. If there is any information that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to prevent any further processing or use of the data.

Have a privacy enquiry?

If you have any enquiries regarding this policy, wish to exercise your rights in respect of your personal data, or wish to make a complaint in relation to how we have handled your personal data, please contact us at:

Attention: Data Protection Manager

Email: enquiries@capellacapital.com.au

Post: Level 13, Australia Square Plaza, 95 Pitt Street, Sydney NSW 2000

We aim to resolve all enquiries promptly and in accordance with Data Protection Laws.

We will always aim to address your concerns if you have any and would encourage you to contact us at the address above. You can also contact the relevant data protection/ supervisory authority in your jurisdiction.

You will be required to provide proof of identity before we provide access to any personal data held about you.

Sole traders, partnerships and businesses

Where we are engaged with you as a sole trader, partnership or business that you represent or are employed / contracted by and this involves the collection and use of your personal data by us, this will be done in accordance with the relevant parts of this policy.

Other websites

Our website may, from time to time, contain links to and from the websites of third parties. If you follow a link to any of these websites, please note websites of third parties have their own privacy policies and we do not accept any responsibility or liability for these policies or your use of those websites.

Changes to this Policy

From time to time, we may change our policy on how we deal with personal data or the types of personal data which we hold. We will take all measures necessary to communicate any changes to this policy to you as required by law and any updated version of this policy will be published on this page. You may obtain a copy of our current policy from our website or by contacting us at the contact details above.

20 October 2025