Privacy Policy

Collins St Asset Management Pty Ltd (ACN 601 897 974) (CSAM) holds Australian Financial Services licence No. 468935 and is the trustee of the Collins St Global Fund, Collins St Value Fund, Collins St Special Situation Fund No.2 and CSAM GPI Fund. Collins St Convertible Notes Pty Ltd is the trustee of the Collins St Convertible Notes Fund. Together with other related bodies corporate, they form the Collins St group of companies (we, our, us), that are subject to this Privacy Policy.

We recognise the importance of protecting the privacy and the rights of individuals in relation to their personal information. This document is our Privacy Policy and it tells you how we collect and manage personal information about you.

We respect our clients' and investors' (you, your) rights to privacy under the Privacy Act 1988 (Cth) (Act) and, to the extent required by the Act, we comply with all of the Act's requirements in respect of the collection, management and disclosure of your personal information.

This Privacy Policy applies to personal information we collect about investors and prospective investors in the funds for which we act as trustee or investment manager, from the directors, trustees, beneficial owners, authorised signatories and other individuals associated with investing entities, financial advisers and other professional advisers, visitors to our website and other people we deal with in the course of our business.

This Privacy Policy tells you how we deal with personal information we may collect about you. The Privacy Policy should be read subject to any overriding provision of law and contract.

When you apply or accept any of our products or services, or provide us otherwise with your personal information, we will collect, hold, use and disclose your information as set out in the Privacy Policy.

What is personal information?

When used in this Privacy Policy, the term "personal information" has the meaning given to it in the Act. Under the Act personal information means:

information or an opinion about an identified individual, or an individual who is reasonably identifiable:

(a) whether the information or opinion is true or not; and

(b) whether the information or opinion is recorded in a material form or not.

What personal information do we collect and hold?

We may collect and hold the following types of personal information:

- your name, address, email address, telephone number, age or date of birth and any other identifying information contained in documents you may provide to us as proof of your identity (e.g. a driver's licence or passport), and the results of any electronic verification of your identity;
- your occupation or job title;

- copies of relevant trust deeds, partnership agreements or company constitutions, and information about the directors, trustees, partners, beneficial owners, controlling persons and authorised signatories of companies, trusts, partnerships and other entities that invest with us;
- transactional information you provide to us (e.g. your bank account details for the payment of distributions and redemption proceeds), and details of your application money, unit holdings, distributions, redemptions and transfers;
- information we are required to collect under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) (AML/CTF Act) and related laws, including information to verify your identity, information about the source of your application money and, where required, information about the source of your wealth, and information to determine whether you are subject to sanctions;
- your tax file number (TFN) or Australian Business Number (ABN) (if you choose to provide it), your country of tax residence, any foreign taxpayer identification number, and whether you are a United States citizen or resident, as required under taxation laws including the laws relating to the Foreign Account Tax Compliance Act (FATCA) and the Common Reporting Standard (CRS);
- information we need to confirm that you are a wholesale client for the purposes of the Corporations Act 2001 (Cth), such as an accountant's certificate as to your net assets or gross income, or evidence that you are a professional investor;
- the details of your financial adviser, accountant or other professional adviser, and of any joint applicant;
- your signature (including scanned signatures) and the content of instructions you give us, including instructions given by email;
- details of the products and services you have purchased from us or which you have enquired about (including your investments in our funds), together with any additional information necessary to deliver those products and services and to respond to enquiries;
- any additional information relating to you that is provided to us directly through our websites or indirectly through use of our websites or online presence, through our representatives or otherwise; and
- correspondences between you and us and information which you provide when corresponding with us, including the information we use to confirm your identity when you contact us (our security checks).

How do we collect personal information?

We collect personal information directly from individuals about whom the information relates unless it is unreasonable or impracticable to do so. When collecting personal information we may collect it in ways including:

- when you complete a form which you provide to us (including the Application Form for one of our funds);
- through your access and use of our website and our investor services;
- from communications between you and us (including for example, from emails and telephone conversations);
- during conversations between individuals and our representatives; or
- through our promotional or marketing activities.

In some circumstances you may need to provide personal information about third parties (e.g. information about the directors, beneficial owners or authorised signatories of a company or trust that is applying to invest, or about a joint applicant). When this occurs, we rely on the person giving the information to inform the third party that they are providing the personal information to us and to advise the third party that we can be contacted for further information.

We may also collect personal information from third parties including your financial adviser, accountant or other professional adviser; the operator of any investor directed portfolio service (IDPS) or platform through which you invest; our fund administrator and unit registry; identity verification service providers; third parties who have hosted events or marketing promotions in which we have been represented and at which you have expressed an interest in our funds; and law enforcement agencies and other government entities.

If you invest in one of our funds indirectly through an IDPS or other platform, the operator of that service (and not you) holds the units. In that case we usually receive only the information the operator gives us, and the operator's own privacy policy governs how it handles your personal information.

Cookies

In some cases, we may also collect personal information through the use of cookies. When you access our website, we may send a "cookie" (which is a small summary file containing a unique ID number) to your computer. This enables us to recognise your computer and greet you each time you visit our website without bothering you with a request to register. It also enables us to keep track of products or services you view so that, if you consent, we can send you news about those products or services. By using cookies, we can remember your personalised settings. We also use cookies to measure traffic patterns, to determine which areas of our website have been visited and to measure transaction patterns in the aggregate. We use this to research our users' habits so that we can improve our online products and services. Where information collected through cookies or our website logs (including your IP address) identifies you, or is reasonably capable of identifying you, we treat it as personal information and handle it in accordance with this Privacy Policy.

If you do not wish to receive cookies, you can set your browser so that your computer does not accept them. Please note this does not opt you out of being sent marketing materials. You will continue to receive generic marketing on our website even if you do not allow your computer to accept cookies.

We may log IP addresses (that is, the electronic addresses of computers connected to the internet) to analyse trends, administer the website, track users movements, and gather broad demographic information.

What happens if we don't collect personal information?

If a person does not provide us with the personal information described above, some or all of the following may happen:

- we may be unable to accept your application, establish your investment in a fund or administer your investment;

- if we cannot verify your identity or the source of your application money as required by the AML/CTF Act, we may refuse your application, delay, block, freeze or refuse transactions, or suspend the payment of withdrawal proceeds;
- if you do not provide your TFN or ABN (or claim an exemption), we may be required to withhold tax from your distributions at the highest marginal rate (plus the Medicare levy);
- we may not be able to provide the requested products or services, either to our usual standard or at all;
- we may not be able to provide information about products and services;
- we may not be able to provide updates and other information about products and services previously purchased; and
- we may be unable to tailor the content of our websites.

Security

We take reasonable steps, including technical and organisational measures, to ensure your personal information is protected from misuse, interference and loss and from unauthorised access, modification or disclosure. If a data breach involving your personal information is likely to result in serious harm to you, we will notify you and the OAIC in accordance with the Notifiable Data Breaches scheme under the Act. We may hold your information in either electronic or hard copy form. Investor information is held on secure servers or in locked storage in controlled environments. Our employees and service providers are required to keep confidential any personal information we hold. We also take reasonable steps to ensure that the personal information we collect, use and disclose is accurate, up to date and complete. Personal information is destroyed or de-identified when no longer needed and no longer required under law to be maintained (for example, the AML/CTF Act and the Corporations Act require us to keep certain records for at least seven years).

As our website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

If you give us instructions by email, we will act on them only in line with our security and verification procedures. Please be aware that fraudulent requests can be made by someone who has access to your email account and to keep your email account secure.

For what purposes do we collect, hold, use and disclose personal information?

We collect your personal information primarily so we can verify your identity and establish and administer your investment in our funds. We collect, hold, use and disclose personal information for the following purposes:

- to provide products and services to you and to process your application, establish and manage your investments and administer your investment, including processing redemptions, transfers and distributions and providing statements, tax statements and reports;
- to confirm that you are a wholesale client;

- to contact you when you so request, and provide you with information you have requested;
- to process communications you send us and to send you communications, and to act on instructions you give us (including by email);
- to answer enquiries and provide information or advice about existing and new opportunities;
- to provide access to protected areas of our website;
- to verify your identity and to get in contact with you if we need to;
- to conduct appropriate checks for fraud and to protect against fraud or any other activity which could result in harm to our products or services;
- to conduct internal research to improve the way we provide service to our clients, including assessing and improving the performance of our website, and to improve our products and services;
- to conduct business processing functions including providing personal information to our related bodies corporate, contractors, service providers or other third parties;
- for the administrative, marketing (including direct marketing), planning, product or service development, quality control and research purposes;
- to update our records;
- to process and respond to complaints;
- to comply with laws and our legal obligations, including our obligations under the AML/CTF Act, the Corporations Act and taxation laws (including FATCA and the CRS), and to report to the Australian Taxation Office (ATO), AUSTRAC and other regulators;
- to run our business, including our role as trustee or investment manager of our funds;
- any other purposes identified at the time of collecting personal information, and anything you authorise us to do.

Personal information we collect will not be shared, sold, rented or disclosed other than as described in this Privacy Policy.

To whom do we disclose personal information?

We may disclose personal information to:

- our employees and related bodies corporate;
- our fund administrators and unit registries, our custodians, and other service providers with whom we work to provide our services and products, including providers of custody, registry, unit pricing, auditing, mailing and printing services;
- other contractors or service providers, for the purposes of operation of our website or our business and to otherwise provide products and services including, without limitation, web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as auditors, accountants, solicitors, business advisors and consultants;
- with your consent, your financial or legal adviser or accountant;
- where you invest as a joint applicant, each other joint applicant;
- the operator of any IDPS or platform through which you invest;
- regulatory bodies, government agencies and law enforcement bodies (including the ATO, AUSTRAC and ASIC) in any jurisdiction as required by law;
- other third parties as required or authorised by law;

- third parties such as a complaint body to whom a complaint relating to a product or service is referred, any party acquiring, or proposing to acquire, an interest in our business and anyone acting on your behalf; and
- any person or organisation for any authorised purpose with your express consent.

We may combine or share any information that we collect with information collected by any of our related bodies corporate (within Australia).

We have reporting obligations under the AML/CTF Act and the law may prevent us from telling you that a report has been made. Where required by law, we may disclose information we collect to regulatory or law enforcement agencies, including AUSTRAC.

Use of computer programs in decisions about you

We, and service providers acting on our behalf (including our fund administrator and unit registry and our identity verification and screening service providers), use computer programs, including rules-based software and automated screening tools, in some decision-making processes. Some of these decisions could reasonably be expected to significantly affect your rights or interests, and personal information about you is used in the operation of those programs.

Kinds of personal information used

The kinds of personal information used in the operation of these computer programs include:

- identification information, such as your name, residential address and date of birth, the details of identity documents you provide to us (for example, your driver's licence or passport) and the results of electronic verification of that information against government and other databases;
- information about the directors, trustees, partners, beneficial owners, controlling persons and authorised signatories of entities that invest with us;
- your country of residence, citizenship and tax residence, and your TFN, ABN or foreign taxpayer identification number status;
- information about the source of your application money and, where required, the source of your wealth;
- your investment, transaction and bank account details, including application, redemption, transfer and distribution instructions and any changes to your payment details; and
- technical information, such as IP addresses, device information and log-in activity, when you use our website or online investor services.

Decisions made solely by computer programs

The kinds of decisions that are made solely by the operation of computer programs, without a person reviewing the outcome before it takes effect, are:

- applying withholding tax to your distributions at the rate required by law where you have not provided your TFN or ABN or claimed an exemption; and
- calculating the number of units issued or redeemed, and the amount of distributions and redemption proceeds payable to you, based on your holdings and instructions and the applicable unit price.

Decisions where computer programs assist our staff

The kinds of decisions for which a computer program does a thing that is substantially and directly related to making the decision (for example, by verifying information, generating a match, alert or risk rating, or recommending an outcome that our staff or our service providers' staff then review) are:

- whether we can verify your identity, and the identity of individuals associated with an investing entity, and whether to accept, delay or refuse your application to invest;
- whether you, or an individual associated with an investing entity, are a politically exposed person or are subject to sanctions, and the level of money laundering and terrorism financing risk we assign to your investment;
- whether to delay, block, freeze or refuse a transaction, or suspend the payment of redemption proceeds, where monitoring or fraud-detection tools flag activity as unusual or potentially fraudulent (for example, a request to change bank account details or an instruction received by email); and
- whether we are required to make a report to AUSTRAC or another regulator.

If you have questions about how a computer program has been used in a decision about you, or you would like us to review a decision, please contact our Privacy Officer using the details below. Some information may be withheld where the law requires it, for example where disclosure would reveal that a report has been made under the AML/CTF Act.

Direct marketing materials

We may send you direct marketing communications and information about our products and services that we consider may be of interest to you. We may use your personal information to gain an understanding of you, your needs and your interaction with us so that we can identify other investment opportunities, products and services which may be of use to you and tell you about them. These communications may be sent in various forms, including mail, SMS, fax and email, in accordance with applicable marketing laws, such as the Spam Act 2003 (Cth). If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so.

At any time, you may opt out of receiving marketing communications from us by contacting us (see the details below) or by using opt-out facilities provided in the marketing communications and we will then ensure that your name is removed from our mailing list. If you ask us to stop, we will not send you further material of that kind.

We do not provide personal information to other organisations for the purposes of direct marketing.

How can you access and correct personal information we hold about you?

You may request access to any personal information we hold about you at any time by contacting us in writing (including by email) or by telephone (see the contact details below), subject to passing our security checks. Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you). We may charge you a fee to cover our administrative and other reasonable

costs in providing the information to you. We will not charge you for simply making the request and will not charge you for making any corrections to your personal information.

There may be instances where we cannot grant you access to the personal information we hold about you. For example, we may need to refuse access if granting access would interfere with the privacy of others, if it would result in a breach of confidentiality, or if giving access would be unlawful (for example, where it would reveal that a report has been made under the AML/CTF Act). If that happens, we will give you written reasons for any refusal.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment, then we will add a note to the personal information stating that you disagree with it.

What is the process for complaining about a breach of privacy?

If you believe that your privacy has been interfered with, including if you are concerned that there may have been a breach of the Australian Privacy Principles in relation to your personal information, please contact us using the contact information below and provide details of the incident so that we can investigate it.

We will acknowledge your complaint, investigate it and respond to you in writing within a reasonable time (usually within 30 days), in accordance with our complaints resolution policy. If you are not satisfied with our response, you may complain to the Office of the Australian Information Commissioner (OAIC) at www.oaic.gov.au or on 1300 363 992.

Do we disclose personal information to anyone outside Australia?

Our custody, fund administration and registry providers have back-office facilities outside Australia, and your personal information is likely to be disclosed to, and processed by, personnel of those providers located in Fiji, India, Mauritius, the United States and The Philippines. Some of our IT and cloud service providers may also store or process personal information in Canada, the United States, Germany. Before disclosing personal information to an overseas recipient, we take reasonable steps to ensure that the recipient handles it consistently with the Australian Privacy Principles. In addition, information we report to the ATO under FATCA or the CRS may be provided by the ATO to foreign tax authorities, including the United States Internal Revenue Service.

Changes to this Privacy Policy

We may amend this Privacy Policy from time to time. If we amend this Privacy Policy, the amended Privacy Policy will be made available on our website. You are invited to review this Privacy Policy from time to time.

Contacting us

If you have any questions about this Privacy Policy, any concerns or a complaint regarding the treatment of your privacy or a possible breach of your privacy, please use the contact link on our website or the contact details set out below.

We will treat your requests or complaints confidentially. Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in a timely and appropriate manner.

Please contact:

Privacy Officer
Anton Lawrence (Head of Compliance)
Collins St Asset Management Pty Ltd (ACN 601 897 974)
Suite 903, Level 9, 365 Little Collins Street
Melbourne VIC 3000
Telephone: (03) 9602 1230
Email: office@collinsst.com.au

This Privacy Policy was last updated on 18 November 2026.