
Privacy Policy

Redwood North Pty Ltd ABN 77 128 962 210 and its subsidiaries and affiliates (collectively referred to as **Redwood North**), is committed to ensuring the confidentiality and security of your personal information. This policy (**Privacy Policy**) outlines why we need to collect personal information and how we manage the personal information we collect about individuals including our members.

In this Privacy Policy, “we”, “us” and “our” refers to Redwood North, and “you” and “your” refers to any individual about whom we collect personal information.

About Redwood North

Redwood North conducts business in investment management services, namely investing in various Australian companies on behalf of its members.

Australian Privacy Principles

Redwood North maintains all personal information in accordance with the Australian Privacy Principles (**APP**) introduced by the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* and listed in Schedule 1 of the *Privacy Act 1988 (Cth)* (**Privacy Act**). We are committed to being open with you about how we use your personal information.

Why do we Collect and Hold Personal Information

Understanding and providing investment services to our members is core to the activities of our business. We may collect and hold your personal information to provide you with our products and services. Personal information may also be used to keep you informed about our range of products and services, conduct research or receive various marketing communications. You can opt out of receiving marketing information from us at any time by contacting us using the contact details below or using the opt-out functionality contained in the electronic message (refer to ‘Queries and Complaints’). The personal information provided may be used to administer and manage our products and services, including for training, audit or data analytic purposes or any other purposes authorised by you.

We will collect and record information that will assist us in complying with our legal obligations including taxation and anti-money laundering and counter-terrorism financing.

The Information we may Collect

As a provider of investment management services, we are subject to legislative and regulatory requirements which require us to obtain and hold detailed information which personally identifies you. The type of personal information we may collect can include (but is not limited to):

- Name and address;
- Date of birth;
- Contact details (including email address and phone number);
- Signature;
- Passport details;

- Driver's licence details;
- Trust deeds;
- Bank account details; and
- Tax file number.

We may also need to collect other personal information relating to your professional details, finances, assets and liabilities, current investments, income, marital status and gender to assist us in the provision of our services to you.

In specific circumstances we may collect what is classified as “sensitive information” under the Privacy Act. We only do this to the extent such sensitive information is relevant to our functions and activities and in accordance with applicable privacy laws.

Source of information

This Privacy Policy applies to all personal information collected by us, or submitted to us, whether offline or online. Wherever practicable, we will collect information from you personally. We may also collect your personal information from external sources, for example, from other professional advisers, our service providers, our websites, through email messages that we may send to you or receive from you, as well as in administering and managing relationships with our investors.

Use and Disclosure of Collected Information

The personal information we hold will be reasonably necessary to carry out our business and used for the provision of products and services to you, including investment management services. In some instances, it may be necessary for us to disclose your personal information to third parties outside Redwood North. We may also collect information to fulfil administrative functions associated with these services, for example billing, entering into contracts with you and/or third parties and managing customer and other business relationships. Unless you consent to this disclosure, we will not be able to provide you with our services. The types of organisations to whom we may disclose your personal information include, but are not limited to:

- Regulators such as Australian Transaction Reports and Analysis Centre (AUSTRAC), the Australian Securities and Investments Commission (ASIC), the Australian Tax Office (ATO) and the Australian Prudential Regulation Authority (APRA);
- Financial institutions for the provision of financial products such as investments;
- Affiliates and business partners of Redwood North;
- Service providers and suppliers, including companies that provide services to, for, or on behalf of Redwood North;
- Organisations providing mailing services, maintenance of information technology services and printing standard documents and correspondence; and
- Where the law requires or permits us to do so.

Direct Marketing

From time to time, Redwood North may use your personal contact details for the purpose of informing you about our services, upcoming promotions and events as well as for sending you Redwood North newsletters and blogs, or other opportunities that may interest you or as otherwise permitted under applicable privacy laws.

If you do not want to receive direct marketing communications, you can opt-out at any time by contacting us using the contact details below or using the opt-out functionality contained in the electronic message (refer to ‘Queries and Complaints’).

If you opt-out of receiving marketing material from us, Redwood North may still contact you in relation to its ongoing relationship with you.

Accessing and Correcting Collected Information

If you wish to access the personal information we hold about you, please contact us (see ‘Queries and Complaints’). Redwood North will always ask you to identify yourself to our satisfaction and provide us with a reason for requesting the information. We will take reasonable steps to facilitate access to the information by discussing with you how you would like to receive access to the information and what manner would be most appropriate.

We will take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and up-to-date. You can help us to do this by letting us know if you notice errors or discrepancies in information we hold about you and letting us know if your personal details change. You may ask us to correct any information we have to your satisfaction.

We may decline your request to access or correct your personal information in certain circumstances in accordance with the APP’s. If we do refuse your request, we will provide you with a reason for our decision and, in the case of a request for correction, we will include a statement with your personal information about the requested correction.

Data Security

The security of your personal information is important to us. Your personal information is held in secure cloud-based storage facilities. We use security procedures and update our technology, from time to time, to protect your information. If our service providers have access to your personal information, we require them to have appropriate privacy policies and procedures to adequately protect your information. We are required by law to keep your personal information for a certain period of time. When we no longer require the information for any purpose, we will destroy by secure means or permanently de-identify the information.

Identifiers

We will not adopt as our own any identifiers that you may provide to us such as Tax File Numbers.

Anonymity

The nature of investment management services does not lend itself to treating clients with anonymity. For us to provide you with an investment service we require personal information about the individual for whom the service is provided.

Transborder Data Flows

Redwood North may store your personal information on servers based overseas or in the “cloud” or other types of networked or electronic storage. Your information may be stored in jurisdictions including: the United States of America, Luxembourg, Germany and Japan.

Cookies

When you visit our website, details may be recorded about your visit, such as time and date, server address, pages accessed, time spent and type of browser. This information is used in an anonymous form for statistical purposes and as such cannot identify you individually.

We may use cookies to identify your browser so that next time you visit our website we remember your log in details. A cookie is a small file which remains on your computer and contains information enabling Redwood North's website to recognise your browser. If you do not wish to permit the use of cookies, you can adjust the settings on your browser to reject cookies or notify you when they are being used.

Links to Third Party Websites

Redwood North's website may have links to external third-party websites that may benefit the user. External websites should contain their own privacy statements and we recommend you review them when using their websites. Please note that third party websites are not covered by our Policy and these websites are not subject to our privacy standards and procedures.

Your Rights if you are in the EU

As provided for in the *General Data Protection Regulation* (EU) (GDPR), you have the right to access your data; to correct or rectify your data; to delete your data subject to applicable law; to have your data processed only in accordance with applicable law; to have copies of your data to be moved to another controller; to object to our processing your data otherwise than in accordance with the law; and to withdraw any consent to our processing your data at any time.

Queries and Complaints

If you require further information about our privacy policy or wish to make a complaint about possible breaches of your privacy, you should direct your complaint to the attention of Redwood North's Privacy Officer via zoe@redwoodnorth.com.au.

It is our intention to use our best endeavours to resolve any complaint to your satisfaction; however, if you are unhappy with our response, you are entitled to contact the Office of the Australian Information Commissioner. The Office of the Australian Information Commissioner can be contacted by telephone on 1300 363 992 or by using the contact details on the website www.oaic.gov.au.

Review

From time to time it may be necessary for Redwood North to review this statement. Redwood North reserves the right to change this Policy at any time without notification.