

Privacy Statement

Scope

This Privacy Statement applies to information collected by Avalon Funds Management Ltd (ACN 601 991 388) (AFSL 470722) ("Avalon" or "we") and its related bodies corporate. It outlines how we manage your personal information and safeguard your privacy.

At Avalon, we understand your concerns about privacy and the security of your personal information. Your privacy is important to us and we are bound by the Privacy Act 1998 (Cth) and the Australian Privacy Principles ("APP"). We are committed to protecting the personal information that we hold about you.

What personal information is collected?

Avalon only collects personal information that is reasonably necessary for us to perform our functions. The kind of personal information we collect, and hold will depend upon the type of products and services that you request from us and may include:

- information you give us when you request a product or service from us. This information may include your name, address, contact details and relevant identification documents;
- financial information about you such as your financial position and information obtained from credit checks if you have authorised us to carry out those checks;
- communications between us and your financial adviser or mortgage broker;
- transactional information about the use of a product if you have or had a product with us; and
- in a limited number of circumstances such as in some superannuation products, your personal health information.

How personal information is collected?

Avalon collects your personal information in a number of ways including:

- directly from you, such as when you provide the information by phone, email or in an application form; and
- from third parties such as credit reporting agencies, other credit providers or from other Avalon group of companies, if you authorise us to do so.
- Collection of your Personal Information may include us collecting from:

- Our authorised representatives;
- Our distributors or referrers, agents, business partners and affiliates, other insurers or related Companies;
- Our service providers;
- o Family members or anyone you have authorised to deal with us on your behalf;
- Our legal or other advisers;
- Social media and other virtual communities and networks where people create, share or exchange information;
- AFCA or any other external dispute resolution body;
- Persons who are authorised under power of attorney or otherwise to manage your affairs;
- Publicly available sources of information;
- Data partners, analytic consultants and other similar organisations; and
- Any other organisation or person where you have consented to them providing your Personal Information to us or consented to us obtaining Personal Information from them.

Anonymity

Where possible, you have the option of interacting with us anonymously. For example, you may visit and browse our website and use some of our online facilities without having to reveal any Personal Information.

It's your choice whether to provide your personal information. However, if you don't, we might be unable to fulfil your request for a specific product or service or be unable to identify you to protect you against fraud.

Use and disclosure of your personal information

Avalon will never sell, rent or trade your Personal Information.

We may use your personal information in a number of ways including:

- to verify your identity or transactions which you may enter into with us;
- to provide the product and services that you request;
- to administer and manage the provision of our products and services;
- to respond to queries, complaints or to provide you with our general customer services;
- to comply with laws and regulatory requirements including complying with any request made by a governmental authority in connection with legal proceedings or the prevention or detection of fraud and crime;

- to comply with Avalon 's risk management policies and procedures; or
- to train our staff.

We may use your personal information for additional purposes related to the purposes listed above. We will not, however, use your personal information other than for:

- a purpose made known to you;
- a purpose you would reasonably expect;
- a purpose required or permitted by law; or
- a purpose otherwise authorised by you.

Third party access to personal information

We may contract out some of our functions such as mailing, settlement services or identification verification to external service providers from time to time and only in those instances will we disclose personal information to those providers. Only information pertinent to these products or services will be provided and confidentiality clauses feature in our service agreements with third party providers and suppliers.

We may also disclose your information to companies within the Avalon group so that products and services may be offered.

Where we have obtained your approval to conduct credit checks, we may obtain personal information from or disclose personal information to credit reporting agencies.

When personal information is disclosed to a company operating in a foreign country, we will ensure that the information will be protected by a law or in a contract which upholds privacy principles similar to the APPs.

Quality of the personal information

We aim to ensure that personal information we retain about you is accurate, complete and up to date. To enable this, we may regularly ask you to review, confirm and advise us of changes to your personal information.

Storage and security of information

Avalon stores personal information in a combination of computer storage facilities, paper-based files and other records. We will take reasonable steps to protect personal information from loss, misuse, unauthorised access, modification or disclosure.

Data Breaches

Security of your personal information is very important to us. Avalon has implemented internal procedures to manage data breaches if they occur.

A data breach occurs when personal information that an organisation hold is subject to unauthorised access or disclosure or is lost.

A data breach may be caused by malicious action (by an external or insider party), human error, or a failure in information handling or security systems.

Avalon will notify you and the Office of the Australian Information Commissioner about any eligible data breaches.

If you believe that Avalon has experienced a data breach, please contact us by email at info@avalonfm.com or write to us at Avalon Funds Management, PO Box 108 Varsity Lakes QLD 4226

Access to your personal information

You may request access to the personal information that we hold about you or request correction to personal information that we hold. Subject to the limited circumstances set out below, we will endeavour to process your request in a reasonable time or within 30 days. In order for us to process your request we will need to verify your identity. There is no charge for requesting access to your personal information, however in some circumstances, we may need to charge an administrative fee, of which we will inform you in advance.

In the event that we refuse you access to your personal information, we will provide you with an explanation for that refusal. These reasons may include:

- an unreasonable impact on the privacy of other individuals;
- the information relates to legal proceedings between Avalon and you;
- the information would reveal our commercially sensitive decision-making process; or
- we are prevented by law from disclosing the information or providing access.

Use of our website

We will collect some information from you when you visit the Avalon Funds Management website www.avalonfm.com. Your use of the facilities and services available through the website will determine the amount and type of information

that we will collect about you. Some of this information will not be personal information because it will not reveal your identity.

The only personal information which we collect about you when you use the website is what you tell us about yourself; for example, by completing an online form such as an application form or by asking for a disclosure document for our products or by sending us an email. We will record your email address if you send us an email.

Cookies

When you visit the website, our server places small pieces of data known as 'cookies' on your hard drive. Cookies are pieces of information that are transferred to your computer when you visit a website for record-keeping purposes. Most Web browsers are set to accept cookies. However, if you do not wish to receive any "cookies" you may set your Web browser to refuse cookies. We use cookies to provide us with aggregate (anonymous) information on how people use our website and to help us know what our customers find interesting and useful in our website. We do not link this information back to other information that you have provided to us.

Direct Marketing

On occasion, we, and our related companies, may use your Personal Information to provide you with information about the products and services we or our distributors, referrers, agents, business partners, affiliates and any proposed new or incoming insurer may offer.

You can opt out of receiving direct marketing information from us at any time (see the section 'How to contact us about Privacy').

Changes to our Privacy Policy

Avalon may make changes to this Privacy Statement from time to time and all changes will be posted on our website. Please check our website periodically. Alternatively, you can email info@avalonfm.com and request a copy of our most recent policy. Whenever using our websites, you should read this policy in conjunction with the relevant website's Terms of Use.

Contacting us

If you would like more information about how we manage your personal information, please contact us at info@avalonfm.com.

If you ever have an issue or complaint in relation to privacy, please contact us via the contact channels listed above.

We take privacy related complaints very seriously and consider all complaints carefully as part of our commitment to being open, honest and fair in dealing with your concerns. We'll contact you within five working days of receiving your complaint to let you know what actions we are taking regarding the matter.

If you are not satisfied with our response to your enquiry or complaint you can contact the Privacy Officer and request that it be reviewed by a senior staff member who will endeavour to resolve your dispute within 30 days from when you first notified us.

You can obtain information on privacy issues in Australia by visiting the Office of the Australian Privacy Commissioner's web site located at www.oaic.gov.au, by email at enquiries@oaic.gov.au or by telephoning 1300 363 992.