

# PRIVACY POLICY

At Semper Securities Limited (Semper) and its associated companies, we are committed to protecting your privacy in accordance with the *Privacy Act 1988* (Cth).

This Policy describes our policies and practices for collecting, handling, storing, using and disclosing personal information. It also deals with how you can complain about a breach of the privacy laws, access the personal information we hold about you and have that information corrected (where necessary).

This Privacy Policy is effective as at February 2021. We will update the Policy from time to time. The updated Policy will be posted on our website.

## **What personal information do we collect and hold?**

We collect personal information so that we can provide you with our products and services and comply with our legal and regulatory requirements. We primarily collect this information when you submit an online application, when you transact with us, when you access the website operated by us and when you communicate with our staff.

In addition, we may collect personal information about you although you are not an investor in our dealings with you.

The personal information we collect from you will depend on the circumstances of collection. The type of information we collect from you to be able to provide you with our products and services includes (but is not limited to) your name, contact details (such as your address, email address and telephone number), bank account details tax file /identification number.

In most cases, we collect your personal information directly from you. However, we may also collect your personal information from other sources such as your accountant or financial adviser.

## **How do we use your information?**

We use your personal information for our business purposes, to provide you with products and services, to administer and manage the investments you have made, to communicate with you on an on-going basis about your investments and to comply with relevant laws and regulations.

From time to time we may use your contact details to send you educational and marketing material about other products we offer. We will always give you the option of electing not to receive these communications and you can unsubscribe at any time by notifying us that you wish to do so.

We may use personal information that you provide us to improve our products and service, to verify your identity and/or to prevent fraud, crime or other activity that may cause harm.

## **What if you don't provide information to us?**

If you do not provide us with some or all the information that we ask for, we may not be able to provide you with the products and services you require.

## **How do we store and protect your personal information?**

We strive to maintain the accuracy, completeness and currency of the personal information we hold and to protect its privacy and security. We keep personal information only for as long as is reasonably necessary for

the purpose for which it was collected or to comply with any applicable legal reporting or document retention requirements.

We hold the personal information we collect from you in secure data storage facilities. We only use service providers located in Australia.

We utilise a range of technical security measures to ensure that your information is safe, including password controls, secure authentication, encryption, firewalls and anti-virus technology.

We maintain physical security over our paper and electronic data and premises, by using locks and security systems.

We also train our staff on the importance of maintaining the confidentiality of personal information and the privacy of individuals.

When we do not require your personal information anymore we will delete, destroy or de-identify it.

In the unlikely event of a data breach we have measures in place to manage and respond to data breaches, which include the notification to impacted individuals and data protection authorities, where required.

### **Will we disclose your personal information to anyone?**

In some circumstances we may disclose your personal information to persons/entities outside of Semper, including to:

- our external services providers and contractors who supply services to verify your identity or to validate your accounts;
- our auditors, professional advisers and insurers;
- our affiliates for business purposes and internal reporting;
- other Noteholders in accordance with the terms of the Master Trust Deed for Notes;
- courts, and dispute resolution bodies, in the course of a dispute;
- those we are required or authorised by law or regulation to disclose your personal information (for example the Australian Taxation Office, the Australian Securities and Investments Commission and the Australian Transactions Reports and Analysis Centre); and
- anyone authorised by you or in respect of whom you have provided your consent.

Where relevant we will take all reasonable steps to ensure that they protect your information in the same way that we do.

We will not disclose your information to overseas recipients.

We do not sell, trade, or rent your personal information to others.

### **How can you check, update or change the information we are holding?**

You may ask us for access to your personal information at any time.

Upon receipt of sufficient information to allow us to identify you, we will tell you what personal information we hold about you. We will also correct, amend or delete your personal information if we agree is inaccurate, irrelevant, out of date or incomplete.

We do not charge for receiving a request for access to personal information or complying with a correction request.

To access or correct your personal information, please send a written request via an email to [enquiries@semper.com.au](mailto:enquiries@semper.com.au) or write to us at Semper Securities Limited at Level 4, Nelson House, 283-285 Clarence Street Sydney NSW 2000.

In some limited situations, we may need to refuse access to your information or refuse a request for correction. We will advise you as soon as possible after your request if this is the case and the reasons for our refusal.

### **What happens if you want to complain?**

We welcome your questions and comments about how we manage your privacy. If you have any concerns about whether we have complied with the Privacy Act, the Australian Privacy Principles or this Privacy Policy, please send an email to our Privacy Officer at [enquiries@semper.com.au](mailto:enquiries@semper.com.au) or write to our Privacy Officer at Semper Securities Limited at Level 4, Nelson House, 283-285 Clarence Street Sydney NSW 2000.

We will consider your complaint through our internal complaints resolution process and we will try to respond with a decision as soon as possible.

If you feel your complaint has not been satisfactorily addressed, or that it is taking too long to resolve, you may contact the Office of the Australian Information Commissioner (OAIC) to have the complaint heard and determined. To contact the OAIC call 1300 363 992 or find them online at [www.oaic.gov.au](http://www.oaic.gov.au).

### **Your consent**

By submitting a request to enable an account; in order to access or view the investment opportunities offered by Semper, you consent to the collection and use of the information you have provided to us for the purposes described above.

### **Third party websites**

Our website may have links to external third-party websites that may be accessed by you and benefit you for information purposes only. We do not share your personal details with any external websites. In the event you share personal details we note that any external website should contain their own privacy statements and we recommend you review them when using their websites. Third party websites are not covered by this policy.

## Web and mobile data

**Personal data** – We will only collect personal information for the purposes of validating your application to invest through the Semper Platform and be shown opportunities to invest in loans with the purchase of Semper Notes. All investor information is quarantined to an investor specific application and Semper account. It is not shared with any other party other than those which might require confirmation of items associated with regulatory compliance. Personal Identity verification details are not stored by Semper unless these are borrower details associated with a particular loan in which case any documents are retained for the legally permissible term. Any investor identity details are submitted on the portal for digital validation with an external authority. In certain circumstances additional borrower information associated with a loan opportunity may be requested to be uploaded by Semper (including but not limited to photos, appraisals, valuation and loan property specific reports, business use details and associated promotional material, accountancy statements and credit scores), where such information is provided Semper may use any item to describe or promote a loan opportunity to internal funders, current investors or future prospective investors. Where data is direct-input it is not stored on any local servers and protected through cloud based protocols. Where information is uploaded through the portal it is contained within user specific accounts. In certain circumstances additional information may need to be provided through means other than the Semper web or mobile portal (such as via an email). The treatment of this information may be considered the same as if it were submitted via the Semper web or mobile portal.

**Other data** - We may use diagnostic related technology (such as cookies, beacons, tags, scripts and tracking pixels) to collect, store and use anonymous data about how you access and use our website / mobile technology. This may include your server address, the date and time of your visit, the pages and links accessed, the type of browser used and other information about your browsing activities. This data is used to increase functionality and can also enable us to display information and content that is tailored to our understanding of your interests. This information alone cannot be used to discover your identity.

## Cookies

- **What are cookies?**  
Cookies are small text files that are downloaded to your computer or mobile device when you interact with online content (such as websites, social media sites and mobile apps). Cookies allow the server to identify and interact more effectively with your device.
- **What information do we collect via cookies?**  
Generally, the information collected through cookies relates to the device used to access online content, such as an IP address, browser type and operating system and does not identify, or relate, to a particular individual. Cookies may also collect information about the behaviours of the user of the device, such as access times, referring sites and pages viewed.  
In some circumstances, the information collected through cookies may be combined with information that identifies the end user of the relevant device. This may occur, for example, if you log into the secure website, or if you interact with certain content (such as a link) that we have sent you in an email. Any personal information we collect in this way is handled in accordance with our Privacy Policy.
- **What do we use cookies for and how can you manage your cookie consents?**  
Some cookies are needed to run the website and can't be turned off. But we need your consent to use other types of cookies that are not essential, for example:
  - Functional cookies which remember your accessibility options and settings,
  - Performance cookies which tell us how you use our website,
  - Marketing cookies which enable us and our social media providers to provide tailored advertising.