

1 Purpose

Southmore Capital is committed to ensuring the privacy of personal information of the individuals and any related parties with whom we deal with. The purpose of this policy sets out how Southmore Capital manages the personal information we hold about you. Southmore Capital is committed to complying with the Australian Privacy Principles which set the standard for how organisations should deal with personal information. The Australian Privacy Principles (the APPs) are set out in the *Privacy Act 1988* (Cth) (the Act). Members of our company are bound by the Act and the APPs, upon which this policy is based.

2 About Southmore Capital

Southmore Capital is a venture capital fund manager operating in Australia focused on supporting emerging businesses. Southmore Capital is also involved in facilitating direct investment into or the direct purchase of Australian businesses.

Southmore Capital Pty Ltd (ABN 97 114 576 742) operates jointly with and shares common ownership with the related businesses Southmore Partners Pty Ltd (ABN 95 610 909 914) and Southmore Advisory Pty Ltd (ABN 65 157 771 938).

This Privacy Policy applies to Southmore and all of its related entities.

3 Scope of Southmore Privacy Policy

This policy is authorised by Southmore Capital Pty Ltd ABN 97 114 576 742 (**Southmore**) and its Australian related entities.

4 The information we collect

We only collect information about individuals directly from individuals and their duly appointed representatives.

The type of information collected by us will depend upon your relationship with Southmore and may include:

- name and title
- address
- contact details
- detail on entities through which you invest
- date of birth
- bank account details
- employment details
- citizenship details
- shareholding details
- Australian or foreign tax-payer identification or business registration identification numbers

In most cases, and wherever possible, Southmore will try to collect personal information from you. Information will be collected through various company forms and from you directly, either in writing or verbally.

Personal information is information or an opinion about you from which you can be reasonably identified. Southmore collects personal information so that we can provide you with our products and services and comply with our legal obligations such as those under Australian

taxation laws and the Anti-Money Laundering and Counter-Terrorism Financing Act. If Southmore does not collect your personal information, we may not be able to provide you with a product or service.

We do not generally collect sensitive information about individuals unless required by applicable laws or rules. Sensitive information would include information relating to things such as:

- race
- political or religious beliefs
- sexual preferences
- criminal convictions
- membership of professional or trade associations or unions
- health information.

We also collect personal information from people who submit applications or register interest for employment with Southmore.

In addition, we may collect personal information about individuals who are not customers of Southmore (e.g. business contact details of a company representative with whom we deal).

Depending on how you choose to interact with us, we may collect your personal information when you contact us or our service providers by telephone, by email, through our website, complete an application or registration form, or when you meet one of our representatives face to face.

Our website may contain links to other sites, terms of use of which will not be covered by this Privacy Policy. Southmore is not responsible for the content or practices of any of these other websites.

Southmore may also collect information about you from third parties. For example, Southmore may collect personal information from:

- your authorised representatives and advisor(s)
- our service providers
- your employer, or
- our corporate clients, where we are providing services to them.

5 How your information is held

Your personal information is held in our systems for our investors and shareholders.

Generally, personal information is stored and archived electronically.

All internal systems are subject to the security measures detailed in this policy. All external service providers are contractually required to hold personal information in accordance with the Act.

6 How information is used

Southmore collects personal information about you primarily:

- to provide you with the products and services you request

- to provide you with the information you request
- to verify your identity before transactions are processed, your instructions are carried out, or providing you with information about your investment
- to administer your financial product
- to provide you with information about other products or services offered by Southmore or its related entities
- to respond to your enquiries or complaints
- to satisfy any legal requirements.

Laws and rules regarding the use of personal information may vary by jurisdiction within Australia. Southmore complies with applicable laws and rules in all Australian jurisdictions.

We may also collect, use and exchange your information in other ways where permitted by law.

Southmore does not sell, rent or trade personal information to or with third parties.

7 Anti-Money Laundering and Counter Terrorism Legislation

The *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) (**AML/CTF Act**) is aimed at addressing money laundering in Australia and the threat to national security caused by terrorism. This legislation requires us to collect identification information from investors into our investment products to verify your identity from original or certified copies of specified documents. Details of what identification information and documentation you are required to provide are set out in transactional based forms. We may also contact you to follow up and clarify certain information.

Under this legislation we are also required to monitor transactions to identify any suspicious activity within any of our investment products.

As required under the AML/ CTF Act, we may, in our absolute discretion, without notice to you, disclose or otherwise report details of any transaction or activity, or proposed transaction or activity (including any personal information) to the relevant reporting body.

8 Disclosure of Personal Information

Southmore does not sell, rent or trade personal information to, or with, third parties.

In some circumstances your information may be disclosed to Southmore's related entities or service providers that from time to time perform a range of services on our behalf, such as:

- outsourced service providers including administration, custodial and registry service providers, printers and mailing houses, and information technology systems
- solicitors, accountants or other advisors to provide professional advice to in relation to one of our services
- investment managers or other financial institutions to facilitate an investment
- software providers, actuaries, professional advisers and research organisations
- business partners, including insurance underwriters
- government agencies including APRA, ASIC, AUSTRAC, or the ATO
- financial intermediaries such as financial planners
- related companies.

Where Southmore contracts with an outsourced service provider or business partner we take reasonable steps to protect the privacy of any information disclosed to them. This includes inserting confidentiality provisions and a requirement to comply with the Act in our contractual arrangements.

9 Declining Product or Service Offers (Opting-Out)

From time to time Southmore may wish to use your information to tell you about other products, services or other offerings that we think may be of interest to you. Please let us know if you do not want to receive these offers by contacting us using the contact details noted below.

10 Quality of Information

Southmore aims to ensure that the personal information we retain about you is accurate, complete and up to date. Please provide us with complete and accurate information and keep us informed of any changes in your details such as a change of address.

If you do not provide all or part of the personal information that we request we may not be able to contact you or to administer your investment properly.

If you believe that the information we hold about you is inaccurate please contact us directly using the contact details provided below, so that we can update our records.

11 Security of Information

Southmore will at all times take reasonable steps to protect your personal information from misuse, loss, unauthorised access, modification or disclosure. Your personal information is treated as confidential.

Employees and contractors of Southmore are bound by confidentiality obligations.

We may store your files in hard copy or electronically in our ordinary IT systems. These may include Australian-based cloud servers or the servers of third parties within Australia.

We implement a range of physical and electronic security measures to protect the personal information that we hold including password controls, firewalls and virus protection.

All premises housing our systems and other copies of your information are monitored and protected by security alarms and access card or key lock entry.

Service providers who hold personal information are contractually required to hold information in accordance with the Act and Southmore obtains periodic confirmation of adequate information security management.

12 Your Rights of Access and Correction

You are entitled to obtain access to your personal information subject to some exceptions allowed by law. You may also request that Southmore correct or update information that we hold on you. We encourage our customers to ensure that their personal information is accurate and up to date, particularly mailing address and contact details.

If you wish to make a request for access to your personal information please contact us using the contact details below.

13 Data Breaches and Southmore's Responsibilities

In addition to its obligations under the Act and the APPs, Southmore is also subject to the *Privacy Amendment (Notifiable Data Breaches) Act 2017* (Cth) which established the Notifiable Data Breaches scheme (**NDB Scheme**) in Australia in February 2018.

In response to the NDB Scheme, Southmore has developed a Data Breach Response Plan to ensure it can perform a prompt and thorough assessment of any suspected data breaches which may occur.

Under the NDB Scheme, Southmore may be obliged to notify you and any other individual whose information has been compromised by a data breach incident, and report the matter to the Australian Information Commissioner.

For further information on the NDB Scheme and other relevant privacy laws, please visit www.oaic.gov.au

14 Complaints

If you have a complaint related to how Southmore has managed your personal information, please contact our Privacy Officer, whose details are set out in Section 16.

Southmore will consider your complaint and respond in the manner detailed in your offer document (if you are a wholesale investor) or otherwise within 30 days.

If your complaint is still not satisfactorily resolved, you may consider lodging a [Privacy Complaint Form](#) with the Office of the Australian Information Commissioner. For more information, please visit the [Australian Information Commissioner's website](#).

15 Change to Policy

From time to time it may be necessary for us to review and revise our privacy policy. We reserve the right to change our privacy policy at any time.

The Board will review and approve any changes to the Privacy Policy.

16 Contact Details

If you have any questions about this privacy policy, if you wish to complain about how we handled personal information about you, or if you wish to access or correct your personal information, please contact Southmore's Privacy Officer at privacy@southmore.com.au or using the following address details:

*The Privacy Officer
Southmore Capital Pty Ltd
Suite 715, 147 Pirie Street
Adelaide SA 5000*

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