AORIS INVESTMENT MANAGEMENT

Privacy Policy



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1. WHAT KINDS OF PERSONAL INFORMATION IS COLLECTED AND HELD?

Aoris Investment Management Pty Ltd (Aoris IM) is required to collect and hold personal information in order to provide its services to our investors (clients). Generally the kinds of personal information we collect includes:

- · your name, home address, email address, telephone number and date of birth
- other identification verification information, including photographic information from documents including your birth certificate, passport; driver's licence, pension card, citizenship certificate, tax notice assessment, Medicare card and utilities notices
- · financial information about your sources of wealth and purpose of investment; and
- tax information including your tax file number (TFN)

When recruiting employees or appointing contractors Aoris IM may collect and hold personal information such as: the individual's name, contact details, date of birth, citizenship, employment references, civil credit and criminal records, regulatory accreditation (such as RG 146 accreditation for advisers) and driver's licence information, education and employment history. Once appointed we will also collect and hold TFNs, financial information relating to the appointing and banking details for payments.

2. HOW IS IT COLLECTED?

For our clients, personal information is mainly collected through the application forms that you complete and to access our financial products and/or services. In addition personal information may be provided to us via meetings, telephone, email, correspondence or through our website.

Information may also be received through third parties such as financial advisors.

3. WHY WE COLLECT, HOLD, USE AND DISCLOSE CLIENTS' PERSONAL INFORMATION?

Aoris IM collects, holds, uses and discloses clients' personal information for the purposes of:

- · providing financial products or services; and
- complying with our regulatory or legal requirements, including:
 - the Anti-Money Laundering & Counter-Terrorism Act 2006
 - the Corporations Act 2001
 - the Australian Securities and Investments Commission Act 2001
 - the Bankruptcy Act 1966; and
 - applicable taxation law.

4. HOW IS IT HELD?

We respect the personal information you have entrusted to us and we have a responsibility to manage and protect that information.

Your personal information will be stored in a secure environment in hard copy, electronically or both. With the exceptions detailed within this policy, your information will only be available to employees of Aoris IM or our service providers on a need-to-know basis in order to perform their obligations and duties.

5. HOW DO YOU ACCESS YOUR PERSONAL INFORMATION AND SEEK CORRECTION OF IT?

Should you wish to know what personal information Aoris IM holds on you, you may request to view this information by contacting our Privacy Officer:

Name: Mr Daniel Micallef

Address: Level 2, 167 Phillip Street, Sydney, 2000

Tel no.: +61 2 8098 1503 Email: info@aorisim.com.au

The Privacy Officer will promptly investigate your privacy enquiry and provide you with appropriate answers where required. Should you discover that any information is outdated, incorrect or incomplete you may request to have the personal information corrected and Aoris IM will promptly update our records. You may also contact the Privacy Officer if you have any questions on our compliance with the Privacy Act 1988 (Cth).

6. HOW CAN I COMPLAIN ABOUT A BREACH OF MY PRIVACY?

If you wish to make a complaint about our handling of your personal information you should contact the Aoris IM Privacy Officer as referred to above. If we cannot resolve your complaint then you may raise your issue with the Office of the Australian Information Commissioner.

All privacy breaches that have resulted in or are likely to result in serious harm to any individual affected are 'eligible data breaches' which must be reported by Aoris IM to the Office of the Australian Information Commissioner.

7. TO WHOM MIGHT IT BE DISCLOSED?

Generally Aoris IM will only disclose your personal information for the purposes of providing our financial products or services to you. This may include disclosing your personal information to related entities of Aoris IM and third parties where necessary to provide you with our financial products or services. These third parties may include government departments and regulatory authorities They may also include our auditors, insurers, custodians, IT providers and third party administrators (service providers).

We may disclose personal information to overseas recipients in order to provide our financial products and/or services. Before disclosing any personal information to an overseas recipient Aoris IM will take reasonable steps to ensure the overseas recipient complies with the Australian Privacy Principles (AAPs) or is bound by a substantially similar privacy regime or you otherwise consent to the overseas disclosure or the disclosure is required or authorised by law.

8. IS SENSITIVE PERSONAL INFORMATION COLLECTED?

Aoris IM will not collect sensitive personal information on clients. Sensitive personal information is information about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health information, genetic information, biometric information or biometric templates.

9. ADDITIONAL INFORMATION

Further information on privacy in Australia may be obtained by visiting the website of the Office of the Australian Information Commissioner (OAIC) at: http://www.oaic.gov.au/. We regularly review the OAIC website to keep informed of issues and developments in privacy law and changing legal obligations.

--- End of Policy --