

PROSTAR CAPITAL PRIVACY POLICY

1. Introduction

- 1.1 This Privacy Policy applies to Prostar Capital Partners Ltd, Prostar Capital Partners Management Ltd, and each of their respective related parties, any trust or partnership of which the trustee or general partner is Prostar Capital Partners Ltd or Prostar Capital Partners Management Ltd or any of their respective related parties, or any entity which manages or advises, or sub-manages, or sub-advises, or is managed or advised by, any of the foregoing (**Prostar Affiliates**) where that Prostar Affiliate is an organisation that is incorporated in Australia (or in the case of a partnership or a trust, formed or created in Australia), or otherwise carries on business in Australia (collectively, “**Prostar**,” “**we**,” “**our**” or “**us**”).
- 1.2 Protecting your privacy is important to us. This Privacy Policy sets out how we collect, hold, use and disclose your Personal Information in accordance with Australian privacy laws, including the Australian Privacy Principles (“**APPs**”) set out in the *Privacy Act 1988* (Cth) (“**Privacy Act**”).
- 1.3 In this Privacy Policy, ‘**Personal Information**’ has the meaning given to that term in the Privacy Act.

2. What kinds of Personal Information do we collect and hold?

- 2.1 In the course of carrying out our business and providing products or services to you, we may collect Personal Information from you. The kind of Personal Information we collect includes:
- (a) **Identifying Information** (such as your name, location, date of birth, nationality);
 - (b) **Contact Information** (such as your email address and telephone number, residential and postal addresses and other information that allows us to contact you);
 - (c) **Professional Information** (such as your employment details, including your company name, job title and industry details);
 - (d) **Financial information** (such as your banking and tax details, including your tax file number and ABN if applicable); and
 - (e) **Other information** in the event we have legal obligations to collect such information, for instance to comply with regulatory requirements.
- 2.2 We may collect other kinds of Personal Information about an individual from time to time, where reasonably necessary for, or directly related to one or more of our functions or activities, which we will handle in accordance with this Privacy Policy.
- 2.3 Generally, we only collect Sensitive Information (as that term is defined in the Privacy Act, including information about your racial or ethnic origin, political opinions, religion, criminal record, sexual orientation, health information and biometric information) if such collection is necessary in the course of our business activities, and you have consented to that collection. For example, we may collect information relating to an individual’s criminal record as part of pre-employment verification checks, or anti-money laundering processes.

3. How do we collect Personal Information?

- 3.1 Where possible, we try to collect Personal Information directly from you, for example when you:

- (a) provide to us your contact details, or documents containing your personal information (such as contracts, forms or public records or identification information (such as passport information) for the purposes of confirming your identity or conducting “know your customer” checks under the *Anti-Money Laundering and Counter terrorism Financing Act 2006* (Cth);
- (b) request information or contact us through our website (for example, by telephone, in writing or via email);
- (c) apply to invest in one of our funds; or
- (d) meet with us in person.

3.2 We may also collect your Personal Information indirectly from third parties, such as:

- (a) our related bodies corporate, shareholders, joint venture partners and the companies we invest in;
- (b) our professional advisors (for example, our insurers, auditors, lawyers, accountants and consultants);
- (c) any other organisation with whom we do business (including the buyers and sellers of assets);
- (d) your representatives and business partners (for example, your legal adviser, financial adviser and employer);
- (e) your authorised agent or attorney;
- (f) publicly available sources of information, such as public registers; and
- (g) other entities (with your express or implied consent).

4. For what purposes do we collect, hold, use, and disclose Personal Information?

4.1 We collect, use, hold and disclose your Personal Information to carry out our commercial activities, operations, and to provide the services, products and information that you request. We may collect, use, hold and disclose your Personal Information so that we can:

- (a) provide you with the services, products and information requested by you, and other general business purposes of Prostar;
- (b) respond to your requests or inquiries;
- (c) maintain and administer your business or other relationship with us (for example, updating and maintaining our records);
- (d) communicate with you during the course of your business or other relationship with us;
- (e) administer, support, improve and develop our business activities and services;
- (f) notify you about important changes or developments to our functions, activities, services or to our website;
- (g) accept your investment;

- (h) carry out any other activities which relate to or arise out of any investments or requests made by you;
- (i) assess your application for employment;
- (j) inform you of products, services, information or events we think may be of interest you;
- (k) if you lodge a complaint with us, process and respond to your complaint;
- (l) do anything which you authorise or consent to us doing; or
- (m) take any action we are required or authorised by law to take.

4.2 If you do not provide us with your Personal Information, it may not be possible for us to provide you with the products, services and information you request.

5. Who do we disclose your Personal Information to?

We may disclose your Personal Information to:

- (a) other Prostar Affiliates, our related bodies corporate and shareholders;
- (b) our business partners and service providers (for example, providers of IT, human resources, marketing, business administration and other support services);
- (c) our professional advisors (for example, our insurers, auditors, lawyers, accountants and consultants);
- (d) financial institutions (for payment processing);
- (e) your representatives and business partners (for example, your legal adviser, financial adviser and employer);
- (f) your authorised agent or attorney;
- (g) regulatory bodies, government agencies and law enforcement bodies, as required or authorised by applicable law;
- (h) external dispute resolution schemes; and
- (i) other entities (with your express or implied consent).

6. How do we hold and secure your Personal Information?

6.1 Most of the Personal Information we hold about you is stored in electronic form. Some of the Personal Information we hold about you will be stored in hardcopy files.

6.2 We use a range of electronic and physical security measures to protect the security of the Personal Information we hold, for example:

- (a) office premises are secured within a secure building;
- (b) Personal Information we hold about you is stored electronically in secure data platforms in data centres in Australia and the United States of America, using identify management and multi factor authentication. Electronic documents are encrypted at rest and in transit;

- (c) employees are obligated to keep information secure; and
- (d) we regularly monitor and review our compliance with internal policies and current industry practices.

6.3 We retain Personal Information for the period necessary to fulfil the purposes for which it was collected, or as required by law. We may de-identify information about you so that you can no longer be identified through that information. We may then use and disclose that de-identified information in the course of our business.

7. Overseas disclosure of Personal Information

7.1 We may disclose your Personal Information to recipients (including our Prostar Affiliates) based in overseas jurisdictions, including in the Cayman Islands, Hong Kong, Japan, the Netherlands, Singapore, South Korea, the United Arab Emirates, the United Kingdom, and the United States of America.

7.2 Where we disclose your personal information to recipients based in overseas jurisdictions, we will take reasonable steps to ensure that the overseas recipient of your personal information handles your personal information in accordance with the Privacy Act.

8. How you can access or correct your Personal Information

8.1 You can request access to or seek correction of the Personal Information we hold about you. To do so, please contact us at:

Attention: Privacy Officer

Email: privacy@prostarcapital.com

Postal address: Suite 2, Level 2, 1A Rialto Lane, Manly Sydney NSW 2095

8.2 We will respond to your request to correct your Personal Information within 30 days of receiving a written request.

8.3 We will not charge you a fee for making an application to access the Personal Information we hold about you. However, if we incur expenses for providing access to your Personal Information, we may charge a reasonable, non-excessive fee for processing your request. We will advise you of these charges before proceeding and may require you to pay these charges upfront (before providing access). This fee may reflect costs such as:

- (a) staff costs in searching for, locating and retrieving the requested Personal Information, and deciding which Personal Information to provide to the individual;
- (b) staff costs in reproducing and sending the Personal Information; and
- (c) costs of postage or materials involved in giving access.

8.4 There may be cases where we are unable to provide the information you request, such as where it would interfere with the privacy of others or result in a breach of confidentiality. In these cases we will let you know why we cannot comply with your request. We may be unable to correct information about you if doing so would be contrary to law.

9. Complaints

- 9.1 If you are concerned about the way in which we handle your Personal Information, and think we may have breached the APPs, or any other relevant obligation, please contact us using the contact details above.
- 9.2 If you make a complaint, we will contact you to let you know we are investigating your complaint. We will make a decision about your complaint and write to you to explain our decision.
- 9.3 If we have not responded to you within a reasonable time or if you feel that your complaint has not been resolved satisfactorily, you can contact us to discuss your concerns.
- 9.4 If you are not satisfied with how your complaint is handled by us, then you can lodge a formal complaint with the Office of the Australian Information Commissioner (“OAIC”). Contact details for the OAIC can be found on the OAIC’s webpage (www.oaic.gov.au).

10. Changes to this Privacy Policy

We may make changes to this Privacy Policy from time to time to take into account changes to our standard practices, procedures and processes, or where necessary to comply with new laws and regulations (including changes to the Privacy Act). The latest version of this Privacy Policy will always be available on our webpage (www.prostarcapital.com).

This Privacy Policy was last updated on 22 May 2024.