

# Valuestream Investment Management Ltd

## Privacy Policy Outline

In December 2001 the *Privacy Amendment (Private Sector) Act 2000* came into force, and it is this Act that regulates the way organisations collect, use, disclose and keep secure your personal information.

Valuestream Investment Management Ltd ("the Company") and the various schemes managed by Valuestream Investment Management ("the Funds") are dedicated to both support and comply with the National Privacy Principles that form the basis of these laws to strengthen privacy protection for the general public.

This policy outlines the obligations we have in managing the personal information we hold about our past, present and future clients.

### Why do we collect personal information?

Various laws, particularly those relating to Income Tax and Anti-Money Launder & Counter Terrorism Financing Act (AML/CTF), require that we obtain and hold information about you for the purpose of ensuring compliance with those laws and reporting to ATO and AUSTRAC. We also collect other information to ensure the proper and efficient management of the Funds.

### What personal information do we collect?

The information that we collect is limited to that requested in the Application Form contained in the Funds' Product Disclosure Statements, namely:

- Your name address and contact details,
- Documents used to verify your identity for AML/CTF purposes,
- Your Tax File Number,
- Your bank account details (where you elect to receive cash distributions or where you may otherwise provide this information), and
- The amount of your past and present investment in the Funds.

Tax File Numbers are only used or disclosed when required or authorised by law or unless you have voluntarily consented to disclose this information to any third party. If you choose not to provide the requested personal information we may be required to withhold a portion of your income entitlement from the Funds and remit it to the Australian Taxation Office as required by the Income Tax Assessment Act, the Taxation Administration Act or any other relevant legislation.

Where you have not provided information to us for AML/CTF purposes, we will not be able to accept your Application Form.

We do not collect sensitive information about you, such as information that reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs or affiliations, membership of professional or trade association, membership of a trade union, details of health, disability, sexual orientation, or criminal record. This is subject to some exceptions including the collection is required by law and when the information is necessary for the establishment, exercise or defence of a legal claim.

### How do we collect information?

We generally collect all of the personal information that we require from the Application Form contained in the Funds' Product Disclosure Statements, though we may require additional information which will be collected as the result of a direct request to you. In some circumstances we may be provided with this information by your advisors or agents, as authorised by you. We will not collect your personal information through a third party unless authorised by you.

We will only collect, maintain and use personal information if it is necessary for us to ensure the proper and efficient management of the Funds.

You can deal with us anonymously where it is lawful and practicable to do so. For example, if you telephone requesting our postal address.

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

We will not use or disclose personal information collected by us for any other purpose other than:

- The purposes for which it was provided or secondary related purposes in circumstances where you would reasonably expect such use or disclosure; or
- Where you have consented to such disclosure; or
- Where the NPPs authorise use or disclosure where required or authorised under law; or
- We may use the personal information collected from you for the purpose of providing you with information relating to the Funds or other Funds managed or proposed to be managed by the Company.

However, you may by contacting us, request not to receive such information and we will give effect to that request within 14 days. We maintain a Register for those individuals not wanting direct marketing material.

We take our obligations to protect your information seriously, this includes when we operate throughout Australia and overseas, as part of our operations some uses and disclosures of your information may occur outside your State or Territory and/or outside of Australia. In some circumstances we may need to obtain your consent before this occurs.

We may disclose your personal information to:

- Other companies or individuals who assist us in providing services or perform functions on our behalf such as accountants, the Funds' Custodian and its Unit Registry.
- Regulatory authorities as required under law and Company and Fund auditors for the purposes related to public health or safety, the prevention or detection of unlawful activities or to protect public revenue.
- Anyone else to whom you authorise us to disclose it.

In the event we propose to sell our business we may disclose your personal information to potential purchasers for the purpose of them conducting due diligence investigations. Any such disclosure will be made in confidence and it will be a condition of that disclosure that no personal information will be used or disclosed by them.

## **Ensure your personal information is accurate**

The Company takes all reasonable precautions to ensure that the personal information we collect, use and disclose is accurate, complete and up-to-date. To ensure we can maintain this level of accuracy and completeness, we recommend that you:

- inform us of any errors in your personal information as soon as possible; and
- update us with any changes to your personal information as soon as possible.

## **Security of your personal information**

We will at all times seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure. At all times your personal information is treated as confidential and any sensitive information is treated as highly confidential. All computer-based information is protected through the use of access passwords on each computer. Data is backed up each weeknight and stored securely.

It is a legislative requirement that we keep all personal information and records for a period of 7 years. Should you cease to be a client of ours, we will maintain your personal information on or off site in a secure manner for 7 years. After this, the information will be destroyed.

## You have the ability to access your personal information

You have a right to access your personal information, subject to some exceptions allowed by law. If you would like to access this information, please let us know. You may be requested to put your request in writing for security reasons. Should we refuse you access to your personal information, we will provide you with a written explanation for that refusal.

Some exceptions exist where we will not provide you with access to your personal information if:

- providing access would pose a serious threat to the life or health of a person;
- providing access would have an unreasonable impact on the privacy of others;
- the request for access is frivolous or vexatious;
- the information is related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings;
- providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations;
- providing access would be unlawful;
- denying access is required or authorised by or under law;
- providing access would be likely to prejudice certain operations by or on behalf of an enforcement body or an enforcement body requests that access not be provided on the grounds of national security.

## Our website

Our Website utilises cookies to provide you with a better user experience. Cookies also allow us to identify your browser while you are using our site – they do not identify you. If you do not wish to receive cookies, you can instruct your web browser to refuse them.

## Complaints resolution

If you wish to complain about any breach of the NPPs or this policy, you should contact our Privacy Officer. Your complaint will be dealt with within 5 business days. It is our intention to resolve any complaint to your satisfaction; however, if you are unhappy with our response, you are entitled to contact the Office of the Federal Privacy Commissioner who may investigate your complaint further. Their contact details are as follows:

Director of Compliance  
Office of the Federal Privacy Commissioner  
GPO Box 5218  
**SYDNEY NSW 1042**  
Telephone 1300 363 992

## Contact us

If you have any questions regarding privacy at Valuestream Investment Management Ltd or the Funds or wish to access the personal information we hold about you or if you wish to lodge a complaint, please contact our Privacy Officer, **Mr Robert Marie**.

E-mail invest@valuestream.com.au  
Telephone (08) 9355 5044  
Fax (08) 63890366

Postal address            Suite 12, 18 Stirling Highway  
                                  NEDLANDS WA 6009

## **Additional Privacy Information**

Further information on privacy in Australia may be obtained by visiting the web site of the Office of the Federal Privacy Commissioner at [www.privacy.gov.au](http://www.privacy.gov.au)