

RESIFUND

ResiFund

ACN 154 921 730

Privacy policy

Adopted with effect from: 18 November 2022

Date This **Privacy Policy** was adopted with effect from 18 November 2022.

Company Open Corp Funds Management Ltd ACN 154 921 730 trading as ResiFund of

Suite 102/44 Lakeview Dr, Scoresby VIC 3179

(Open Corp)

Introduction

- A. Open Corp and its subsidiaries (the “Company” and/or “we”) are committed to maintaining and protecting the privacy of the personal information we collect.
- B. We are guided by the Privacy Act 1988 (the “Act”) and its Principles.
- C. The Act affords an individual the right to know what information is held by the Company. How we use the information we collect and how an individual can access the information we hold and if they believe it is incorrect how to request its correction.

1. Purpose and scope

This policy applies to the Australian Residential Property Fund of which Open Corp Funds Management Ltd is the responsible entity (the Scheme).

2. How we collect personal information from you

We collect personal information in a number of ways, including:

- by email;
- over the telephone;
- through written correspondence (such as letters, faxes and emails);
- on hard copy forms (including event registration forms, network registration forms competition entries, surveys);
- in person
- through our website (for example: if you make an online enquiry or request a copy of our product disclosure statement or if you participate in a webinar);
- at expos, seminars and functions (for example, if you fill out an assessment form or leave us your business card);
- expressions of interest;
- from third parties, including:
 - Through an authorised representative such as financial advisers, lawyers, accountants, trustees;
 - direct marketing database providers;
 - the ATO or ASIC (for example, through correspondence in relation to managed investments)

Sometimes we collect information about you from other sources. We do this only if it is necessary to do so. Instances of when we may need to do so where:

- We cannot get hold of you and we rely on publicly available information to update your contact details;
- we need information from a financial adviser about an application you make through us;
- at your request, we exchange information with your legal or financial advisers or other authorised representatives.

3. When the law authorises or requires us to collect information

We may collect information about you because we are required or authorised by law to collect it. There are laws that affect financial service providers, including company and tax law, which require us to collect personal information. For example, we require personal information to verify your identity under Anti-Money Laundering laws.

4. Purpose for which we collect, hold, use and disclose your personal information

We use your information to provide you with the financial product or service you asked for, and for other purposes including:

- giving you information about a financial product or service;
- considering whether you are eligible for a financial product or service;
- processing your application and providing you with a financial product or service;
- administering the financial product or service we provide you, which includes answering your requests and complaints, varying financial products and services and managing our relevant product portfolios;
- identifying you or verifying your authority to act on behalf of another client;
- telling you about other financial products or services that may be of interest to you, or running competitions and other promotions (this can be via email, telephone, SMS, mail, or any other electronic means including via social networking forums), unless you tell us not to;
- assisting in arrangements with other organisations (such as joint venture partners) in relation to a product or service we make available to you;
- allowing us to run our businesses and perform administrative and operational tasks, such as:
 - training staff;
 - developing and marketing financial products and services;
 - risk management;
 - systems development and testing, including our websites and other online channels;
 - undertaking planning, research and statistical analysis;
 - determining whether a beneficiary will be paid a benefit;
 - preventing or investigating any fraud or crime, or any suspected fraud or crime;
 - as required by law, regulation or codes binding us; and
 - for any purpose for which you have given your consent.

You can let us know at any time if you no longer wish to receive direct marketing offers from Open Corp. We will process your request as soon as practicable.

5. How we hold personal information from you

6. What happens if you do not provide us with your information?

Open Corp's policy is to provide individuals with the option of not identifying themselves, or of using a pseudonym, when dealing with us if it is lawful and practicable to do so. A pseudonym is a name or other descriptor that is different to an individual's actual name.

In some cases however, if you don't provide us with your personal information when requested, we may not be able to respond to your request or provide you with the product or service that you are seeking. For example, you must identify yourself to become an Investor in Open Corp's Australian Residential Property Fund.

If you do not provide your information to us, we may not be able to:

- provide you with the financial product or service you want
- manage or administer your financial product or service
- verify your identity or protect against fraud; or
- let you know about other financial products or services from Open Corporation that might be appropriate to meet your financial and lifestyle needs.

7. Security

The steps we take to secure the personal information we hold include security such as encryption, firewalls, anti-virus software and login and password protection, secure office access, personnel security and training and workplace policies.

8. Cookies

When you visit our website, details may be recorded about your visit, such as time and date, your server address, pages accessed, time spent and type of browser. This information is used in an anonymous form for statistical purposes and as such cannot identify you individually.

We may use cookies to identify your browser so that next time you visit our website we remember your log in details. A cookie is a small file which remains on your computer and contains information enabling our website to recognise your browser. If you do not wish to use cookies, you can adjust the settings on your browser to reject cookies or notify you when they are being used

9. Sharing with ResiFund

We may share your personal information with other Open Corp related entities. This may depend on the financial product or service you have applied for and the Open Corp entity you are dealing with.

10. Sharing at your request

We may need to share your personal information with your authorised representative or any person acting on your behalf (e.g. financial advisers, lawyer, accountants, executors, administrators, trustees, or auditor).

11. Sharing with third parties

We may disclose your personal information to third parties outside of the Open Corp, including:

- those involved in providing, managing or administering your financial product or service;
- authorised representatives who may promote financial products or services on our behalf;
- real estate agents;
- our auditors or lawyers and other external advisers;
- fraud reporting agencies (including organisations that assist with fraud investigations and organisations established to identify, investigate and/or prevent any fraud, suspected fraud, crime, suspected crime, or misconduct of a serious nature);
- Government or regulatory bodies (including the Australian Tax Office and Austrac) as required or authorised by law (in some instances these bodies may share it with relevant foreign authorities);
- rating agencies to the extent necessary to allow the rating agency to rate particular investments;
- organisations that maintain, review and develop our business systems, procedures and technology infrastructure, including testing or upgrading our computer systems;
- our joint venture partners that provide financial services such as investment management for us;
- organisations that assist with our product planning, research and development;
- other organisations involved in our normal business practices, including our agents and contractors; and
- Where you have given your consent.

12. Sharing outside of Australia

We may disclose your personal information overseas. However, if we do disclose this information outside Australia, we will do so on the basis that the information will be used only for the purposes set out in this document and in accordance with applicable laws.

We may store your information in the cloud or other types of networked or electronic storage. As electronic or networked storage can be accessed from various countries via an internet connection, it is not always practicable to know in which country your information may be held. Overseas organisations may be required to disclose information we share with them under a foreign law. In those instances, we will not be responsible for that disclosure.

13. Accessing and correcting information

Individuals have a right to request access to the personal information that ResiFund holds about them and to request its correction.

14. Complaints

If you have an enquiry or complaint about our information handling practices please contact us by calling 1300 999 881, by email to warren@resifund.com.au or alternatively write to:

Warren Boothman
ResiFund Privacy Officer
Suite 102/44 Lakeview Dr
Scoresby VIC 3179

It is our intention to resolve any complaint as quickly as possible and to your satisfaction. If you are unhappy with the response provided by us, you may refer your complaint to the Office of the Australian Information Commissioner. www.oaic.gov.au

15. Notifiable Data Breaches

We are required to notify individuals and the Office of the Australian Information Commissioner about 'eligible data breaches'. An eligible data breach occurs when the following criteria are met:

- there is unauthorised access to, or disclosure of personal information held by us (or information is lost in circumstances where unauthorised access or disclosure is likely to occur), and
- this is likely to result in serious harm to any of the individuals to whom the information relates, and
- We have been unable to prevent the likely risk of serious harm with remedial action.

We will conduct an assessment if it is not clear if a suspected data breach meets these criteria. The assessment will determine whether the breach is an 'eligible data breach'.

16. Opting out

Where you have consented to receiving direct marketing communications from us, your consent will remain current until you advise us otherwise. However, you can opt out at any time, in the following way

- send a letter to Mr Warren Boothman (ResiFund Privacy Officer), Open Corp, Suite 102/44 Lakeview Dr, Scoresby VIC 3179 or send an email to: warren@resifund.com.au
- advise us if you receive a marketing call that you no longer wish to receive these calls; and
- use the unsubscribe facility that we include in our commercial electronic messages (such as Email and SMS) to opt out of receiving those messages.