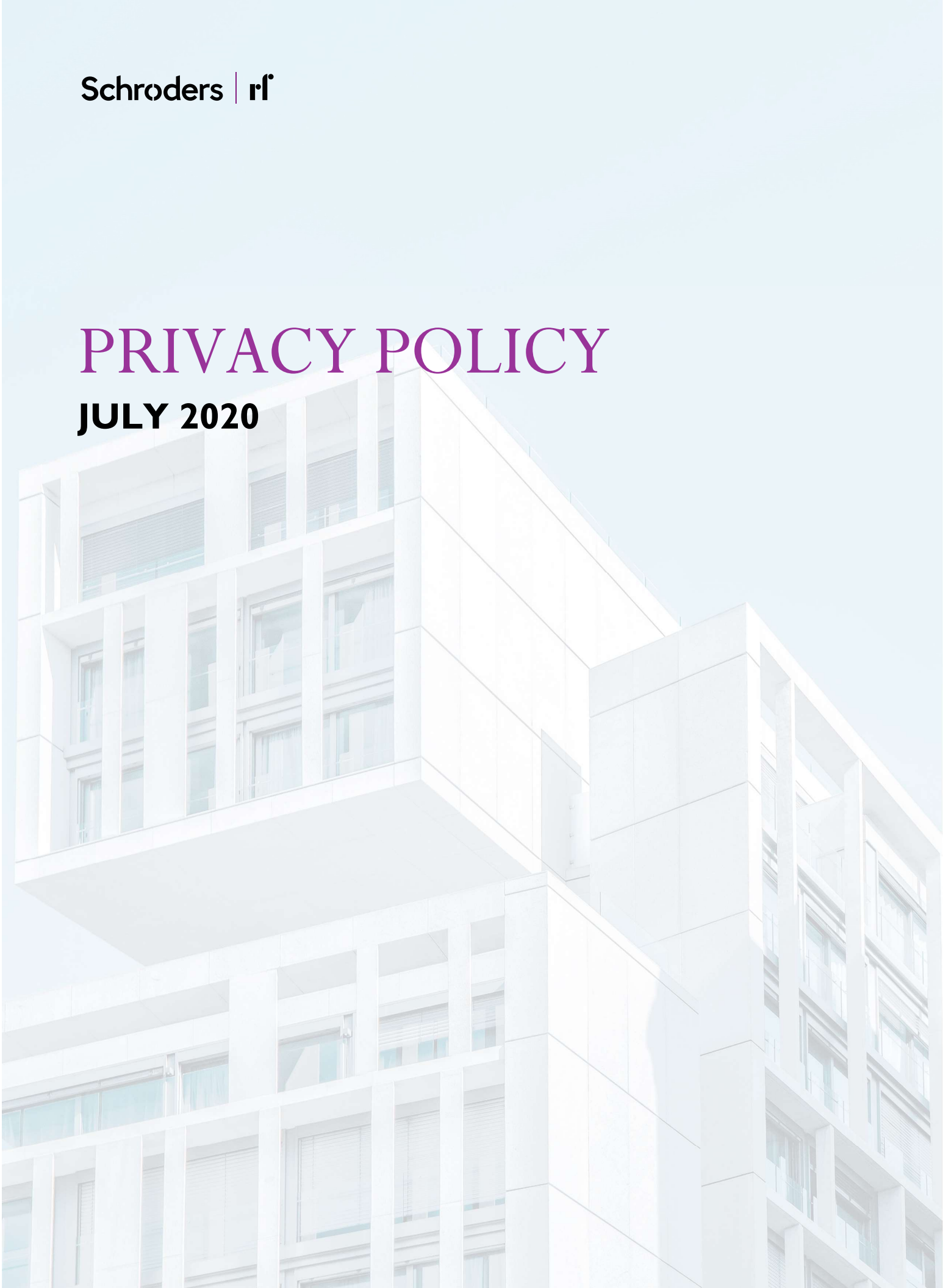
Schroders | rf

# PRIVACY POLICY

**JULY 2020**



# SECTION 1 OVERVIEW

## PURPOSE

Schroders RF Limited ACN 089 265 270 (**Schroders RF**) recognises the importance of protecting the privacy and rights of individuals in relation to their personal information and is committed to the protection of personal privacy within the scope of the applicable law. This Privacy Policy (**Policy**) details how we:

- protect your privacy;
- comply with the requirements of the Privacy Act 1988 (Cth) (**Privacy Act**), the 13 Australian Privacy Principles and the Notifiable Data Breaches scheme; and
- collect, hold, use and handle your personal information, credit information and credit reporting information (**Information**).

By providing any Information to us, either directly or electronically, you consent to the collection, storage, use and disclosure of your Information as set out in this policy.

## APPLICATION

This Privacy Policy (Policy) covers the following:

- Schroders RF employees;
- Schroders RF directors; and
- any other person acting on behalf of Schroders RF such as a contractor.

## RELATED POLICIES AND PROCEDURES

| POLICY | DESCRIPTION |
|---|---|
| AML/CTF Program | Related Policy |
| Breach and Incident Policy | Related Policy |
| Compliance Manual | Overarching Document |

## WHAT DOES THIS POLICY COVER?

| ITEM | DESCRIPTION |
|---|---|
| Who we collect information from | Our borrowers and investors. |
| Types of information we collect | The types of information that we collect and hold will vary depending on the nature of your transaction with us and may include personal information, credit information and credit reporting information. |
| How is your information collected and held | We collect and hold information in the manners permissible by law, as described in this Policy. |
| For what purposes do we collect and use your information | Mainly, we collect in it in order to provide you with our services and products. We may collect it for other incidental purposes as set out in this policy, but always for permissible and legal purposes. |
| How can you gain access to your | You can simply ask us for your information and we will provide it, to the |

| | |
|---|---|
| personal information | extent permissible by Law.<br>Personal information includes any information or opinion, about an identified individual or an individual who can reasonably identified from their information. Information will still be personal information whether or not it is true and regardless of whether we have kept a record of it. |
| How you may complain or inquire about our collection, handling, use or disclosure of your personal information | You can complain to our Privacy Officer or directly to the Privacy Commissioner on the details provided in the relevant section. |

## DEFINITIONS

| TERM | DEFINITION |
|---|---|
| Board | The board of directors of Schroders RF Limited |
| Mortgage Investment | The sum of money advanced to a borrower which is secured by a registered mortgage. |
| Personal Information | Includes any information or opinion, about an identified individual or an individual who can be reasonably identified from their information. Information will still be personal information whether or not it is true and regardless of whether we have kept a record or it. |
| Schroders RF or Schroders RF Group | Schroders RF Limited (**Schroders RF**), AFSL No. 238546 (**Licensee**), as Responsible Entity for the following 2 registered managed investment schemes:<br>• Schroders RF Select Credit Fund (ARSN 090 994 326); and\<br>• Schroders RF Credit Fund (ARSN 606 591 100). |

## REFERENCES

| RELEVANT LEGISLATION/REGULATION | JURISDICTION |
|---|---|
| Corporations Act 2001 | Cth |
| Privacy and Personal Information Protection Act 1988 | NSW |
| Privacy Act 1988 | Cth |
| Income Tax Assessment Act 1988 | Cth |
| Anti-Money Laundering and Counter Terrorism Financing Act 2006 | Cth |

# SECTION 2 PERSONAL INFORMATION

## WHAT TYPES OF PERSONAL INFORMATION DO WE COLLECT?

We collect personal information that is reasonably necessary to for us to provide you with financial products and services you request as well as administer them. The kind of personal information we collect and hold includes:

- Information you give us when you request a product or service from us, including such information as name, date of birth, address, contact details and relevant identification documents.;
- Communications between us and any advisors you may engage;
- Transactional information about your use of any product you have with us;
- Financial information about you such as your financial position and information from credit checks where so permitted and required;
- Information regarding your website interaction with us.

We may collect sensitive information from you but only where you have consented to such collection of sensitive information and / or where such information is necessary to provide you with a specific product or service or where the collection is necessary to lessen or prevent a serious threat to life, health or safety.

We may also collect some information that is not personal information because it does not identity you or anyone else. For example, we may collect anonymous answers to surveys or aggregated information about how users operate our website/s.

From time to time, you may provide us, and we may collect from you, personal information of a third party (for example, financial advisors and or brokers). Where you provide the personal information of a third party, it is your responsibility to ensure that those persons are aware of this policy, understand it and agree to accept it.

Note: the term personal information, credit information, credit eligibility information and sensitive information used in this policy have the meaning as set out in the Privacy Act.

## HOW DO WE COLLECT AND HOLD YOUR PERSONAL INFORMATION?

Generally, we collect personal information directly from you, such as:

- through your access and use of our website;
- directly from you which may include:
  - in person;
  - in documents you give us;
  - through telephone conversations; and
  - emails;
- when you make an enquiry or complete an application;
- in the course of providing you with a requested product, service or benefit and/or;
- whenever you have dealings with us.

We may also collect personal information from your organisation and representatives, our related companies, public sources and third parties who supply services to us.

Sometimes we may be provided with personal information without having sought it through our normal means of collection. This is referred to as "unsolicited information". Where such information is collected, we generally only hold, use and/or disclose that information if we could otherwise do so had we collected it by normal means. If that unsolicited information could have not been collected by normal means then we may be required to destroy, permanently delete or de-identify the information as appropriate.

## WHY WE COLLECT, USE AND DISCLOSE PERSONAL INFORMATION

We will use the personal information we collect for the purpose disclosed at the time of collection and for which it was provided to us, or otherwise as set out in this policy. Our uses of personal information include but are not limited to:

(i) providing you with one or more of our financial services or products;

(ii) improving and tailoring our services and products;

(iii) administering and managing the provision of products and services;

(iv) assessing and processing your application for a financial product or services;

(v) conducting product and market research;

(vi) understanding your needs, interests and behaviour;

(vii) maintaining and updating our records;

(viii) training and managing our people;

(ix) communicating with you about the products and services that are offered (subject to legal requirements and your right to opt out) and conducting other marketing activities;

(x) co-operating with regulators and authorities and complying with our legal obligations (e.g. under anti- money laundering laws);

(xi) to respond to queries, complaints or provide you with general customer services;

(xii) to comply with our risk management practices, policies and procedures;

(xiii) dealing with suspected fraud, misconduct and breaches of legal obligations; and

(xiv) facilitating the sale of any interest in our business

We may disclose your personal information to other persons and entities as permitted under the Privacy Act 1988 (Cth). Taxation (both Australian and international), company, anti-money laundering and counter-terrorism financing and other laws also require some of the information to be collected in connection with your application. If you do not provide the information requested or provide us with incomplete or inaccurate information, your application may not be able to be processed efficiently, or at all.

We may also use and disclose information you provide for the purposes of complying with any other obligations required by law (such as under taxation, company and AML/CTF law).

It may also be necessary for us to disclose your information to certain third parties (some of whom may be located overseas) in order to assist us with one or more of our functions or activities. This may include our related companies, your representatives, government agencies, bodies or authorities (including regulatory bodies) and organisations providing services to us, such as registry, administration, custodial, audit, investment management, legal, customer contact, data processing, data analysis, information broking, research, investigation, insurance, website or technology services. It is not practicable to list every country in which such recipients are located but it is likely that such counties will include Canada, the United Kingdom, Cayman Islands and members of the European Union from time to time.

We will also use and disclose your personal information to send direct marketing to you. The direct marketing may relate to:

- our products and services;
- the products and services that we offer;
- the products and services of other parties;
- promotions run by us; and
- new developments we believe may be of interest to you.

You may opt out of receiving this direct marketing through the unsubscribe function that will be available to you with each direct marketing communication. We will not sell our direct marketing database to any outside organisation.

## BORROWERS AND GUARANTORS

If you are a borrower or a guarantor, or applying to be a borrower or a guarantor, we will disclose personal information about you to credit reporting bodies for purposes related to assessing your credit worthiness and reporting on payment defaults.

We may also disclose your personal information to investors for the purposes of assisting potential investors to make a decision whether to invest their funds in a Mortgage Investment. Personal information that may be disclosed may include your name, property information, the reason and purpose for borrowing the funds, certain financial information relevant to your ability to service the loan and funding requirements for development projects (if applicable), source of income, credit worthiness, documents required to be entered into as security for the loan and previous experience or construction projects undertaken (if applicable).

We may also obtain property reports from relevant authorities about any real estate property which secures your obligations to us, such as:

- Office of State Revenue;
- Land Registry Services;
- Local Council; and
- Utility authorities.

If you are a guarantor or proposed guarantor for someone else's borrowings, we will collect, use and disclose your personal information for the purposes of assessing your suitability as a guarantor and (if necessary) for enforcing the guarantee and collecting payments owed to us.

# SECTION 3 CREDIT INFORMATION

## WHAT TYPES OFCREDIT INFORMATION AND/OR CREDIT ELIGIBILITY INFORMATION DO WE COLLECT?

If you are a borrower or a guarantor, or applying to be a borrower or a guarantor, in the course of providing financial services and performing our other functions we may collect:

- personal information;
- credit liability information;
- repayment history information;
- type of consumer credit or commercial credit and the amount of credit south in an application;
- default and payment information; and
- court proceedings and personal insolvency information

## HOW WE COLLECT, USE AND DISCLOSE YOUR CREDIT INFORMATION AND/OR CREDIT ELIGIBILITY INFORMATION

If you are a borrower or a guarantor, or applying to be a borrower or a guarantor, we will collect and disclose credit information about you to credit reporting bodies for purposes related to assessing your credit worthiness and reporting on payment defaults.

The information may include any or all of the following:

- personal information;
- credit liability information;
- repayment history information;
- type of consumer credit or commercial credit and the amount of credit south in an application;
- default and payment information; and
- court proceedings and personal insolvency information

Generally, we will collect credit information:

- when you submit information through our website;
- in person;
- from your correspondence with us;
- from completed application forms;
- from identification documents;
- from specific requests we make to credit reporting bodies or from other credit providers who you deal with;
- in the course of us providing you with a requested product, service or benefit; and
- when you have other dealings with us.

Credit eligibility information will be disclosed to us by credit reporting bodies in response to our request.

## WHY WE COLLECT, USE AND DISCLOSE YOUR CREDIT INFORMATION AND/OR CREDIT ELIGIBILITY INFORMATION

We will collect, use and disclose credit information and credit eligibility information for the following purposes:

- to establish and maintain your relationship with us;
- to assess your loan application;
- to disclose credit information about you to credit reporting bodies for purposes related to assessing your credit worthiness and reporting on payment defaults;
- to provide products or services you have requested; and
- to answer any enquiry, you make.

We may also disclose your credit information and credit eligibility information to third parties who work with us in our business to provide, products or services you have requested or are interested in, such as:

- financial advisers or brokers;
- valuation companies; and
- consultants and professional advisers including legal service providers.

If you are a borrower or proposed borrower, we may also disclose your credit information and credit eligibility information to investors for the purposes of assisting potential investors to make a decision whether to invest their funds in a Mortgage Investment. Information that may be disclosed may include the credit eligibility information obtained from credit reporting bodies including repayment history information and default information.

If you are a guarantor or proposed guarantor for someone else's borrowings, we will collect, use and disclose your credit information and credit eligibility information for the purposes of assessing your suitability as a guarantor and (if necessary) for enforcing the guarantee and collecting payments owed to us.

# SECTION 4 INABILITY TO COLLECT

## WHAT HAPPENS IF WE CANNOT COLLECT YOUR PERSONAL INFORMATION AND/OR CREDIT INFORMATION

You do not have to provide us with any personal information and/or credit information, however if you do not do so we may not be able to provide you with the products, services or benefits you have requested.

We will use the information we collect for the purpose disclosed at the time of collection, or otherwise as set out in this policy. We will not use your information for any other purpose without first seeking your consent, except where authorised or required by law, such as under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) and related laws, the Corporations Act 2001 (Cth) and taxation legislation.

# SECTION 5 STORAGE AND SECURITY

## STORAGE AND SECURITY OF YOUR PERSONAL INFORMATION

We store your information in a combination of computer storage facilities, paper-based files and other records. In so doing, we have taken numerous steps to protect your information from misuse, interference and loss, and unauthorised access, modification or disclosure.

Additionally, we take reasonable steps to destroy or permanently de-identify your information when we no longer need it.

In some circumstances the parties to whom we disclose information may operate outside Australia. Where this occurs, we take steps to protect information against misuse or loss. One example is where we use cloud storage to store any Information that we hold about you, the cloud storage and the IT services may be located outside Australia.

## DATA BREACHES NOTIFICATION

We will promptly notify you if we are aware of or have reasonable grounds to believe that your personal information held by us is involved in an eligible notifiable data breach and involves personal information that is lost or subjected to unauthorised access or unauthorised disclosure which is likely to result in serious harm. Our notification to you will include recommendations about the steps you should take in response to the breach, and will not be anytime longer than 30 days from when the determination has been made by our management that the breach may cause serious harm. We will also notify the Office of the Australia Information Commission (OAIC) of the data breach.

# SECTION 6 LINKS

Our website may contain links to other third-party websites. We do not share your personal information with those websites and we are not responsible for their privacy practices. Third party websites are responsible for informing you about their own privacy practices. Please check their privacy policies.

# SECTION 7 ACCESS AND CORRECTION

We will at all times take reasonable steps to make sure that the information we collect use or disclose is accurate, complete and up to date. If your personal details are incorrect or have changed, such as your address, phone number or email address, please contact our Privacy Officer by email or at the address detailed below in the Contact Us section

At your request, we will provide you with a copy of any information which we hold about you, unless an exception under the Privacy Act 1988 (Cth) applies, or there is some legal or administrative reason why we be unable to do so and must deny such request. Where we deny your request, we will provide you with a reason why (if we can). We may charge a fee for retrieving this information in which case we will inform you of the fee and obtain your agreement to that fee before providing the information.

# SECTION 8 COOKIES

In some cases, we may also collect your personal information through the use of cookies. Our website may use cookies to track user traffic patterns to better serve you when you revisit our website. A cookie is a small data file that a website may write to your hard drive when you visit it. A cookie file can contain information, such as user ID which the website uses to track the pages that you have visited. You can refuse all cookies by turning them off in your browser. However, full functionally for our website may require the use of cookies.

Information is also generated whenever a page is accessed on our website that records information such as the time, date and specific page. We collect such information for statistical and maintenance purposes that enables us to continually evaluate our website performance.

# SECTION 9 PRIVACY COMPLAINTS

If you wish to make a complaint regarding privacy or information handling, you may do so by contacting us at the details provided below in the Contact Us section.

We will promptly acknowledge and investigate any complaint about the way we manage your information and respond within 21 days after receipt of a complaint. We may seek further information from you in order to provide a full and complete response.

If you are unhappy with our response, or if your concerns are not resolved to your satisfaction, you may contact the Office of the Australian Information Commissioner at www.oaic.gov.au or on 1300 363 992. Alternatively, you may take the matter to the external dispute resolution service (the Australian Financial Complaints Authority (AFCA)).

# SECTION 10 CONTACT US

If you have any questions about this policy or your privacy (including any access, correction, complaint or marketing opt-out requests, or for further details of the entities to which this policy applies) you can contact us via the following contact details:

By phone: +61 2 9954 2211

By email:privacy@schrodersrf.com

By writing: Privacy Officer
Schroders RF Limited
PO Box R1297
Royal Exchange NSW 1225

For information about privacy generally, or if your concerns are not resolved to your satisfaction, you may contact the Office of the Australian Information Commissioner at www.oaic.gov.au and on 1300 363 992.

Schroders RF Limited ABN 54 089 265 270 AFSL 238546 as Responsible Entity for Schroders RF Select Credit Fund ARSN 090 994 326 and Schroders RF Diversified Credit Fund ARSN 606 591 100

www.schrodersrf.com

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