

# Artesian Privacy Policy

This policy applies to Artesian Capital Management (Australia) Pty Ltd and its subsidiaries including Artesian Venture Partners Pty Ltd and Boab AI Pty Ltd (together, **Artesian**). Artesian is committed to maintaining the privacy of the personal and financial data we hold. We recognise that our relationship with investors and clients is based on trust, and that we are expected to act responsibly.

This Privacy Policy sets out further detail about Artesian's approach to handling personal information.

## 1. Collecting personal information

### *How do we collect personal information?*

Where practicable, Artesian will collect an individual's personal information directly from them. For example, we collect personal information from individuals when they (i) complete an Artesian investment application, (ii) request information from us, (iii) engage in a transaction that involves Artesian (or an Artesian-affiliated company), (iv) speak to us on the telephone, (v) provide their business card to us, or (vi) register for an Artesian hosted event.

We may receive information about an individual from third parties that the individual authorises us to deal with. This could be a financial adviser, broker or other representative, such as an executor or administrator.

We may also obtain personal information from other third parties for the purposes set out in this Privacy Policy. For example, if you are a financial adviser, we may obtain information from publicly available sources such as company websites. We may use external identity verification services to verify the identity of a prospective investor or to prevent fraud.

### *What kind of information will we collect?*

We may collect all or some of the following information for the purposes set out in this Privacy Policy:

- » full name, date of birth, gender, occupation and contact details including telephone, address and e-mail;
- » identification documentation (for example, a driver's licence) for the purpose of verifying identity and to ensure compliance with the Anti-Money Laundering and Counter-Terrorism Financing Act and/or other legislation and regulations regarding identification verification, and tax reporting and withholding;
- » tax file number and bank account details for the purpose of administering investor accounts and tax reporting and withholding;
- » investor contribution details and investment choice;
- » details about authorised signatories, joint investors, and deceased estates;
- » detailed contact information about a financial adviser;
- » certified copies of any relevant trust deeds, partnership agreements, constitutions or articles of association, which may be relevant to comply with the Anti-Money

- Laundering and Counter-Terrorism Financing Act;
- » taxpayer identification number used outside Australia, information and documentary evidence about place of birth, residency and citizenship for the purpose of compliance with intergovernmental agreements regarding international tax information sharing and taxation and tax information reporting legislation of Australia and other jurisdictions; and
  - » details of services investors or financial advisers are interested in and information about the investment needs of individual investors, for the purpose of gathering demographic data.

If you do not provide the personal information requested, we may not be able to process an application, provide services to you, or provide you with information about our products and services.

## 2. Using and disclosing personal information

### *For what purposes do we use personal information?*

Generally, Artesian will only use and disclose personal information for the purpose it was collected. We may also use and disclose personal information for other related purposes which we consider an individual would reasonably expect.

The purposes for which we may use and disclose personal information include:

- » to establish and administer an investment account and the investor's relationship with us;
- » to provide products and services, including purchasing and selling assets on behalf of investors;
- » for communication purposes, including handling any relevant enquiries or complaints;
- » to provide market commentary, information about products and services that may be of interest, and marketing;
- » to conduct analysis about our products and services to enhance our service offerings;
- » to protect legal rights and comply with our legal obligations including, but not limited to, record-keeping, reporting, tax withholding, and client identification requirements under applicable laws which may include the following legislation: Corporations Act 2001 (Cth), Income Tax Assessment Act 1997 (Cth), Anti-Money Laundering and Counter Terrorism Financing Act 2006 (Cth), and the Privacy Act 1988 (Cth); and
- » to prevent fraud or abuse and to maintain the integrity of our business systems and infrastructure.

## *Who may we disclose information to?*

### **Required by law**

We may be required by law to disclose personal information. For instance, we may be required to provide details to:

- » Australian Government regulators such as the Australian Securities and Investments Commission (ASIC), Australian Prudential Regulatory Authority (APRA), Australian Tax Office (ATO), Australian Transaction Reports and Analysis Centre (AUSTRAC) and to other regulatory or government entities;
- » Financial Ombudsman Service (FOS);
- » Superannuation Complaints Tribunal (SCT);
- » as required by a court order;
- » to other regulatory or governmental entities outside of Australia as may be required; and
- » your spouse in accordance with the Family Law Act requirements.

### **Account Administration**

In order to meet our investors' needs and provide some investor services, such as administration of accounts and mailing of investor distribution statements, we may need to disclose personal information to other Artesian group entities and external service providers.

Disclosure may be made to the following persons for the purpose of account administration:

- » organisations (including other Artesian group entities) involved in providing, managing or administering our products, systems or services such as administrators, mail houses and software and information technology providers;
- » auditors, consultants and other professional advisers;
- » authorised financial advisers;
- » a representative who is entitled to instruct on, or receive, the proceeds from a deceased investor's account balance (for example a legal personal representative, executor, or administrator) or any person we contact to assist us in that process;
- » other financial institutions who hold an account in an investor's name, for example, where amounts have been transferred to or from that account; and
- » authorities investigating (or who could potentially investigate) alleged fraudulent or suspicious transactions in relation to an investor's account.

## **3. Information quality and security**

Artesian relies on the accuracy of the personal information provided. We aim to ensure that it is accurate, up to date and complete. If any of your details change or you have any concerns regarding its accuracy you should contact us.

We take steps to protect personal information from unauthorised access, modification,

and disclosure including requiring use of passwords, user logins, or other security procedures. Developments in security and encryption technology are reviewed regularly.

#### 4. **Access to, and correction of, information**

You may request access to any personal information we hold about you. Generally, if it is incorrect, we will correct it at your request. This is subject to some exceptions allowed by law, however, for example:

- » if access to information would pose a serious threat to the life or health of an individual, or to public health or public safety;
- » if access to information would have an unreasonable impact on the privacy of others;
- » if the request is frivolous or vexatious;
- » if the information relates to a commercially sensitive decision making process;
- » if providing access would be unlawful;
- » if access would prejudice enforcement activities relating to criminal activities and other breaches of revenue, or a security function;
- » if providing access would reveal the intentions of Artesian in relation to negotiations with you in such a way to prejudice those negotiations;
- » if there are legal proceedings and the information would not be accessible through discovery in those proceedings;
- » where a third party has given us health information about you in confidence; and
- » denying access is required or authorised by or under law. If access is denied we will provide you with the reason why.

#### 5. **Contact Us**

If you have any further questions relating to this Privacy Policy, wish to request access to or correct personal information we hold about you, or wish to lodge a complaint about the way in which we have handled your personal information, please contact us:

Mail:

*Investor Services, Artesian  
Level 3, 45 Wangaratta St, Richmond,  
VIC 3121*

Email:

*investor@artesianinvest.com*

Artesian treats any complaints about our handling of personal information seriously. We will fully investigate any complaint you lodge with us and seek to provide a response as soon as practicable and, in general, no later than 30 days after the receipt of the initial complaint.

If you are not satisfied with the outcome of your complaint you may refer the matter to external dispute resolution or the Office of the Australian Information Commissioner. We will provide you with further details when we respond to your complaint.