



Privacy Policy

AZ Sestante Limited

Dated: July 2016

Responsible Entity:

AZ Sestante Limited
ABN 94 106 888 662 AFSL 284442
Level 18, 1 Margaret St, Sydney NSW 2000

Contact details

If you have an enquiry or would like more information about AZ Sestante Limited, you can speak to an Ironbark representative between 9.00am and 5.30pm (Sydney time), Monday to Friday (excluding public and bank holidays in NSW).

Ironbark Client Services:



Phone: 1800 034 402



Email: client.services@ironbarkam.com



Website: www.azsestante.com

Write to us at Level 18, 1 Margaret Street, Sydney NSW 2000

This Privacy Policy applies to information collected by AZ Sestante Limited ('AZ Sestante'). It outlines how we manage your personal information and safeguard your privacy. We respect the confidentiality of your information and take your privacy seriously, abiding by the Australian Privacy Principles ('APPs') contained in the *Privacy Act 1988* (Cth). When we request personal information, we will normally explain why we need it, how it will be used and who we may share it with.

Personal information collected

We only collect and hold personal information about you that is reasonably necessary for one or more of our business functions or activities, which may include direct marketing. Whenever it is reasonable and practicable to do so, we only collect personal information about you directly from you.

The personal information we collect and hold includes name, contact details, personal details, business details, personal preferences, information about the products and services we have provided and financial information. The personal information we collect and hold may be provided in forms filled out by individuals, face to face meetings, email messages, telephone conversations, or by third parties.

We do not generally collect sensitive information about you. We will only collect sensitive information about you with your consent, unless an exception applies under the APPs. Sensitive information includes information about race, political or religious beliefs, sexual preferences, criminal record and health.

Because of the nature of our business it is impracticable for us to deal with individuals on an anonymous basis or through the use of a pseudonym.

If we receive personal information that we did not solicit, where we determine that we could not have collected that information in accordance with the APPs, we will, where lawful to do so, destroy the information or ensure the information is de-identified.

Use or disclosure of personal information

The personal information we hold is only used or disclosed for the particular purposes for which it is collected. We will not use or disclose any personal information about you for any other purpose without your consent, unless an exception applies under the APPs.

We do not routinely disclose personal information unless:

- disclosure is to service providers or business associates who provide services and financing in connection with our products and services and business functions and activities, which may include:
- your financial adviser or adviser dealer group, their service providers and any joint holder of an investment
- organisations involved in providing, administering or managing our funds, the administrator, custodian or auditors
- organisations providing mailing or printing services
- disclosure is permitted by this privacy policy or the Privacy Act
- you give your consent
- disclosure is otherwise required or permitted by law
- disclosure is to the ATO, AUSTRAC and other government or regulatory bodies
- disclosure is to a related entity or people authorised to act on your behalf.

We may use or disclose personal information about an individual for direct marketing of our products or services, including by email. We will only use personal information for direct marketing where we have collected the information directly from you, and have made you aware that the information may be used for such purpose, or you have consented to use of the information for such purpose. However, individuals may request not to receive direct marketing communications by contacting us.

Cross-border disclosure

In providing our services or products, AZ Sestante or its service providers may disclose personal information to a person outside of Australia ("overseas recipient"), including to overseas facilities or contractors to process or back-up our information or to provide certain services to us. Unless you specifically consent to the disclosure or another exception applies under the APPs, where your personal information is disclosed to an overseas recipient, we will take such steps as are reasonable in the circumstances to ensure the overseas recipient does not breach the APPs in relation to that information. Where an exception applies, we may disclose your information to an overseas recipient in accordance with the terms of the relevant exception.

If you specifically consent to the disclosure of your personal information to an overseas recipient in the manner set out above (such consent may be given by you signing an application for investment in one of our funds), subclause 8.1 of the APPs will not apply to the disclosure and as such the entity disclosing your personal information will not be required to take steps to ensure that an overseas recipient does not breach the APPs in relation to that information and if the overseas recipient handles the information in breach of the APPs the entity disclosing the information will not be accountable under the Privacy Act and the individual will not be able to seek redress under the Privacy Act. The individual also may not be able to seek redress in the overseas jurisdiction. In addition, the overseas recipient may not be subject to any privacy obligations or to any principles similar to the APPs and may be subject to a foreign law that could compel the disclosure of personal information to a third party, such as an overseas authority.

Quality of personal information

We will take such steps as are reasonable to ensure that personal information we collect is accurate, up to date and complete and that personal information we use or disclose is accurate, up to date, complete and relevant. To assist us with this, you should contact us if any of your personal information changes or if you believe that the personal information we have is not accurate, up to date, complete or relevant.

Security of personal information

We will take reasonable steps to protect personal information we hold from misuse, interference and loss as well as unauthorised access, modification or disclosure. We use current techniques and processes to protect personal information. Where we no longer need personal information for any purpose for which the information may be used or disclosed we will take reasonable steps to destroy the information or ensure the information is de-identified in accordance with the Privacy Act.

Access and correction information

You can access personal information that we hold about you by contacting us. We will give full access to personal information, within a reasonable period after a request is made, unless an exception to access applies under the APPs. We will advise you of any exception that applies. We may charge a reasonable fee for providing access. Where we hold information that you are entitled to access, we will endeavour to provide you with suitable choices as to how to access it (e.g. by mail or email).

If we are satisfied that personal information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading ("faulty information") or you request us to correct the information, we will, within a reasonable period after we identify the faulty information or the request is made, take such steps as are reasonable to correct the information.

Website

When you browse through the pages of the website, read or download information, we may collect or note details about your visit such as:

- your server / Internet Protocol address
- your operating system, top level domain name and the type of web browser you use
- the date, time and duration of your visit to the website
- whether you have visited the website previously and what content you viewed.

The information we may collect relates to your server or PC rather than you yourself (except where personal information is provided to AZ Sestante).

The information we may collect may be used within AZ Sestante to help us improve the website by tailoring it to better suit your needs, and to provide quicker and more effective access to the various components of the website. We may disclose this information to other persons for these purposes or for related purposes, including to information technology companies who assist us in constructing, designing and maintaining the website.

We may also collect your personal details if you request information about AZ Sestante that we may supply online, or if you request, email or telephone us with a comment or query. We may use your details:

- to send you the information you have ordered
- to answer your comment or query
- to monitor our responses to you
- for our internal sales and marketing analysis.

If necessary, we may also contact you to follow up on your request, or to provide you with further information which may be of interest to you. Where you have requested documents, we may disclose your personal details to the mailing houses, printers or document management providers which AZ Sestante uses so that they can forward the requested documents to you on our behalf. At any time you may opt out of receiving marketing communications from us.

Contact us about Privacy

You can contact us through the contact details below if you:

- wish to access, update or correct your personal information
- wish to request not to receive direct marketing communications
- require further information about how we handle personal information; or
- have a complaint or concern in relation to privacy.

We will take any issue or concern relating to your privacy matter or complaint seriously and will take all reasonable steps to address your matter or complaint. If you are not satisfied with our handling of your privacy related matter or complaint, you may make a complaint to the Australian Information Commissioner.

Links to other websites

The AZ Sestante website may contain links to websites operated by third parties. AZ Sestante is not responsible for the privacy practices of such third party websites.

Changes to the Privacy Statement

AZ Sestante reserves its right to change this Privacy Statement at any time. Any amended Statement will apply regardless of whether or not we have specifically notified you of any change.