



Privacy Policy

Eclipse Prudent Mortgage Corporation Limited ACN 089 265 270, AFSL 238546, ACL 238546 as responsible entity for Eclipse Prudent Mortgage Fund ARSN 090 994 326

03 October 2017

Eclipse Prudent Mortgage Corporation Limited ACN 089 265 270 (**Eclipse**) is committed to the protection of personal privacy within the scope of applicable law. Our Privacy Policy sets out our commitment in respect of the personal details provided to Eclipse and also details the way in which Eclipse may collect, hold, use and handle your personal information.

We may update this Privacy Policy from time to time. The most current version will be located on our website, and is also available by contacting our Privacy Officer by email or at the address detailed below.

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

Types of personal information collected

The types of personal information that we collect and hold will vary depending on your dealings with us. This information may include any or all of the following:

- Name, address(es), telephone numbers(s) and other contact information;
- Financial information in support of a lending application;
- Electronic addresses, including but not limited to email, Facebook, Twitter, Instagram, Facetime;
- Payment information (such as credit card and bank details);
- Other personal information required to provide our services; and
- Transaction details relating to your use of our products, services or benefits.

We will not collect sensitive information from you or any third party.

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 Privacy Policy, understand it and agree to accept it.

You do not have to provide us with any personal 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.

How we collect personal information

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

- When you submit information through our website;
- In person;
- In the course of us providing you with a requested product, service or benefit; and
- When you have other dealings with us.

We collect personal information through:

- Direct contact with us;
- Our business partners; and
- Third parties who supply services to us.

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, or otherwise as set out in the Privacy Policy. We will not use your personal 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.

We will collect personal information for the following purposes:

- To establish and maintain your relationship with us;
- To provide products or services you have requested from us; and
- To answer any enquiry you make.

We may also disclose your personal 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.

Eclipse 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 efficient, or at all.

Eclipse may also use and disclose the personal information you provide for the purposes of complying with its obligations under law (such as under taxation, company and AML/CTF law).

It may be necessary for Eclipse to disclose your personal 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.

Direct Marketing

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 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.

How we store and protect personal information

We store personal 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 personal information from misuse, interference and loss, and unauthorised access, modification or disclosure.

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

The internet is not a secure method of transmitting information. Accordingly, other than where we use secure socket layer technology (SSL) to ensure information is securely transmitted and processed, we cannot and do not accept responsibility for the security of information you send to or receive from us over the internet, or for any unauthorised access or use of that information.

Do we send personal information overseas?

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

How you can access your personal information

We will take reasonable steps to make sure that the personal 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.

At your request, we will provide you with a copy of any personal information which we hold about you, unless an exception under the *Privacy Act 1988* (Cth) applies. 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.

We will promptly acknowledge and investigate any complaint about the way we manage personal information.

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 functionality 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.

How to contact us or make a complaint

If you have any questions about this Privacy Policy, if you wish to update information we hold about you or if you wish to make a complaint about our collection, use or disclosure of your personal information under the *Privacy Act 1988* (Cth) or this Privacy Policy, please contact:

Eclipse Prudent Mortgage Corporation Limited
Level 54
Governor Phillip Tower
1 Farrer Place
Sydney NSW 2000

Email: belinda@epmcl.com.au

We will take reasonable steps to remedy any issues resulting from our failure to comply with our privacy obligations.