**Privacy Policy**

The Golden Age Capital (GAC) Privacy Policy sets out how the company will collect, manage and utilise personal information. We respect and understand the importance of the protection, appropriate use of and maintenance of confidentiality of security/unit holder personal information. GAC abides by the Privacy Act 1988 (cth) and the principles contained therein.

***Why do we need your Personal Information****?*

In order for GAC to effectively provide its services we will at times be required to collect and hold personal information (as defined in the Privacy Act, generally meaning any information that could be used to personally identify you). The types of personal information which may be collected includes (but are not limited to);

* Name
* Address
* Date of birth
* Contact details (including but not limited to email address, telephone number and fax number)
* Employment details (including but not limited to Professional Title or Occupation)
* Proof of Identity documents (including but not limited to Drivers Licence, Passport or Medicare Card)
* Personal Financial Position (including but not limited to Proof of Income, assets and liabilities, account balances, tax and financial statements)
* Investment related information (including but not limited to bank account details and tax file numbers)
* Citizenship status.

Not all of this information will necessarily be collected by GAC, the details that it collects will be dependent upon the dealings that you have with us and what is required for us to provide you with the products and or services that you seek or that we are compelled to collect in order to comply with relevant laws. For instance, in providing services GAC are required to comply with the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) which requires the collection of your name, address and date of birth.

***Are you required to provide Personal Information?***

You are not legally required to provide GAC with your personal information, however without certain information GAC may be restricted or prevented from providing you with the products or services that you have requested from us.

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

GAC will collect personal information directly from you. However, where it is neither reasonable nor practical for us to do so, we may collect information from third parties such as;

* People authorised by you (such as lawyers or accountants);
* Other credit providers;
* Public sources of information (such as telephone directories);
* Market research organisations (through surveys or telephone polls);
* Third-party brokers (such as insurance and mortgage brokers); or
* Credit reporting bodies.

***Does Golden Age Capital share your information?***

Your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy. In the event GAC is required by Law to provide your personal information to a Government or other authorised agent we will do so.

***Does Golden Age Capital use cookies?***

The word Cookie is a term that refers to small pieces of text that are sent and stored on your computer when you access our Website. Golden Age Capital utilises Cookies to help us track traffic patterns, determine which browser you may be using and identify if you are returning to the website or visiting for the first time. If you don't wish to receive cookies, you can disable them within the settings of your browser.

***How does Golden Age Capital protect your personal information?***

GAC has in place systems, security measures and takes all reasonable steps to protect your personal information from loss, unauthorised access, modification, destruction, misuse or disclosure.

All information is stored securely with access restricted to only employees of Golden Age Capital that require your personal information with employees instructed to handle personal information in a manner that respects the confidentiality of customer information and the privacy of individuals.

*Direct Marketing*

Where GAC believes that particular products or services will be of interest we may send communications marketing these products and services. These communications may be sent via one or more forms including mail, fax, email, SMS, MMS or other electronic messaging services. All communications will comply with the relevant Laws including the Spam Act 2003 (cth).

Unless you contact GAC and request that marketing communications are not sent to you, you consent to us sending you direct marketing communications by any method. If you provide us a preference for a particular form that you wish to receive communications by, we will endeavour to use that method whenever practical to do so.

To request that you do not receive marketing communications please contact us, contact details are provided within the “Contact Us” section.

***How do you access your personal information that Golden Age Capital holds?***

You may “Contact Us’”to request access to the personal information which we hold about you, you have the right to access the personal information we hold about you under the Privacy Act.

Golden Age Capital may refuse access to personal information in certain situations. Examples include where:

* Giving access would have an unreasonable impact on the privacy of other individuals;
* Giving access would be unlawful, or where denying access is required or authorised by an Australian law or a court order;
* Where both of the following apply:
1. We have reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to our functions or activities has been, is being or may be engaged in; and
2. Giving access would be likely to prejudice the taking of appropriate action in relation to the matter; or
* Giving access is likely to interfere with law enforcement activities.

If we do not give you access to your personal information GAC will provide you with a written response detailing the reason why we are unable to provide access.

Before providing the requested information we will give you an estimate of potential costs (if any) associated with providing the information, including expenses for locating, retrieving, reviewing and copying any of the material you need.

***How can you correct mistakes?***

If you believe that any information which we hold is incorrect you may “Contact Us” to request that we update the information that we hold. We will not charge you for updating or correcting your personal information. If we believe that the information which we hold is correct we will insert a note within your personal information that you disagree with the accuracy of the information we hold.

***Where do you direct complaints?***

If you believe that there has been a breach of privacy, or you have other concerns, GAC requests that a submission be made in writing to the Privacy Officer, this enables us to be certain of the details and allow us to clarify if required. Our Privacy Officer (Christopher Crighton) is a member of the GAC Audit, Risk & Compliance Committee and the GAC Company Secretary. Please contact the Privacy Officer utilising the methods outlined in “Contact Us”.

GAC will endeavour to confirm as appropriate and necessary with you your understanding of the conduct relevant to the complaint and what you expect as an outcome. In the event that an investigation into the matter is deemed appropriate the name, title, and contact details of the investigating officer and the estimated completion date for the investigation process will be provided to you.

After we have completed any investigation or undertaken relevant enquiries we will contact you, usually in writing, to advise the outcome and invite a response to our conclusions about the complaint. If we receive a response from you, we will assess it and provide a response.

A complaints register will be created and monitored to ensure proper process is adhered to.

***Contact Us***

You can contact GAC in one of the following ways;

* By telephone: +613 9671 3928
* By email: chris.crighton@goldenagegroup.com.au
* In writing: PO Box 18289 Melbourne VIC 8003

Golden Age Capital undertakes regular reviews of all its policies and may change this privacy policy from time to time. Updated versions of this privacy policy will be posted on our website at [www.goldenagegroup.com.au](http://www.goldenagegroup.com.au).

This privacy policy was last reviewed and updated on 21st October 2016