



---

## Privacy Policy

---

- 1. Overview**

360 Capital Group Limited and its related entities (360 Capital) understands the importance of protecting individuals' rights to privacy. In handling personal information, 360 Capital is subject to the Privacy Act 1988 as amended and complies with the thirteen Australian Privacy Principles set out in the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

We have prepared this policy to help you understand in an open and transparent way how 360 Capital will manage your personal information and how we aim to protect the integrity and security of personal information. The policy describes the way 360 Capital collects, uses and discloses personal information and it provides information on your rights in relation to our management of that information.

This policy is available on our website at [www.360capital.com.au](http://www.360capital.com.au) and may be updated from time to time. We will provide you with a copy of the policy on request free of charge.
  
- 2. What information does 360 Capital collect?**

Personal information means any information that can identify you.

Unless required or authorised by law, 360 Capital will not adopt, use or disclose government related identifiers. Generally, we or our agent will collect personal information, such as:

  1. your name and contact details including home address and e-mail address;
  2. mandatory tax file number, ABN or exemption category;
  3. name of financial institution, BSB number, account number and account name.

This information is necessary for us to provide our services to you and comply with statutory requirements.

If you choose not to identify yourself or to use a pseudonym when dealing with 360 Capital then it may not be legal or practicable for us to provide our products or services in relation to a particular matter.
  
- 3. How is personal information collected and held?**

This will depend on how you interact with 360 Capital or the products and services you request from us. Personal information is typically collected directly from you on completion of an application or registration form. The form will generally be part of, or be supplemented by, a product disclosure statement or other marketing materials. The form and/or supporting documents will provide details on:

  - how to contact us or our agent;
  - the purposes for which personal information is collected;



- if any information is collected from third parties;
- the consequences if all or some of the personal information is not collected;
- details of who else may receive the information;
- how to access and correct the information collected;
- complaints procedures; and
- whether the information will be disclosed overseas and the countries of the recipients.

Personal information may also be taken if you speak with our staff in relation to a particular matter such as in making a complaint.

Mostly it will be unnecessary to collect personal information from other sources, such as from a publicly maintained record. In the event that your personal information is collected from a third party, we will take reasonable steps to inform you from whom, how and why the information was collected.

360 Capital will, in relation to the receipt of unsolicited personal information, determine within a reasonable time whether that information is reasonably necessary for our functions or activities and whether it could have been collected through established processes. If it could not have been so collected or it is not so necessary, we will, if it is lawful and reasonable to do so, securely destroy or de-identify the information. Otherwise, it will be held and used by us in accordance with the Privacy Act 1988 as amended.

We will not collect sensitive information about you such as your racial or ethnic origin, political opinions, religious beliefs, sexual orientation, health and genetic information.

**4. Why we need your personal information**

Personal information is used for the main business or primary purpose for which it was collected:

- processing your application for investments;
- establishing your investment in a fund; and
- administering your investment.

In some circumstances this information may be used by other 360 Capital related entities.

**5. Disclosure and Use of your personal information**

Organisations to which 360 Capital may disclose personal information include:

- your adviser and dealer group;
- any third party service provider 360 Capital may engage to provide custody, administration, technology, auditing, mailing, printing or other services;
- government authorities when and to the extent required by law; and



- 360 Capital's professional advisers (including legal and accounting firms, auditors, consultants and other advisers).

Such disclosure will only be done with your consent.

We may use or disclose your personal information for direct marketing if:

- you have consented to its use for this purpose; or
- you would have a reasonable expectation that your information will be used for direct marketing; and
- we provide you with the opportunity to 'opt out' of receiving direct marketing communications.

360 Capital may, in circumstances that align with its main business purpose, use or disclose your personal information outside of your State or Territory and/or outside of Australia. We will obtain your consent before this occurs. We will not use or disclose your personal information for another purpose unless you consent to its use or disclosure for that purpose.

**6. Security of personal information**

Your personal information is stored in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification or disclosure.

When your personal information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify it. However, as required by law, most of the personal information is or will be stored in client files which will be kept by us for a minimum of 7 years.

**7. Accessing and correcting information held about you**

360 Capital will take all reasonable steps to ensure that the personal information we collect, use or disclose is accurate, up-to-date, complete and relevant for the purpose of its use or disclosure.

You have the right to examine the personal information we collect and hold about you. If at any time you would like to access or correct your details, please contact our Compliance Manager at:

360 Capital Group  
Level 8, 56 Pitt Street  
SYDNEY NSW 2000  
Phone: 02 8405 8860  
E-mail: [investor.relations@360capital.com.au](mailto:investor.relations@360capital.com.au)

If you want to change your personal details held by 360 Capital, please let us know in writing. You can use our 'Change of Details Form' available on our website at <https://360capital.com.au/privacy-policy/>



- 8. Complaints** 360 Capital has in place procedures to properly consider and deal with any concern or dispute that you have with our privacy practices in the collection, storage, disclosure, integrity or security of your personal information. If you have a complaint, contact our Compliance Manager at:

360 Capital Group  
Level 8, 56 Pitt Street  
SYDNEY NSW 2000  
Phone: 02 8405 8860  
E-mail: [investor.relations@360capital.com.au](mailto:investor.relations@360capital.com.au)

The Compliance Manager will deal with your complaint confidentially and endeavour to acknowledge receipt in writing within two business days of receiving the complaint.

We will try to resolve all issues within a maximum of 45 days of receipt, but in a shorter period if possible. If it is impossible to substantially respond to your complaint within 45 calendar days, you will, before the end of that period, be:

- informed of the reasons for the delay;
- advised of your right to complain to the to the Office of the Australian Information Commissioner (OAIC); and
- be provided with the contact details of the OAIC.

In the event you are dissatisfied with the outcome of your complaint, you may refer the complaint to the Office of the Australian Information Commissioner: <https://www.oaic.gov.au/privacy/privacy-complaints/>

If you choose not to identify yourself or to use a pseudonym when dealing with 360 Capital in relation to a privacy complaint, then it may be impracticable for us to investigate and resolve the complaint.

- 9. Changes to this policy** 360 Capital reserves the right to change this privacy policy at any time. We will notify any changes by posting an updated version of the policy on our website at [www.360capital.com.au](http://www.360capital.com.au)