

Microequities Asset Management Group Limited and its related bodies corporate (“we”, “our” or “us”) recognise the importance of protecting the privacy and the rights of individuals in relation to their personal information. This document is our privacy policy and it tells you how we collect, manage and share your personal information when you visit or make an enquiry from (the “Site”).

We respect your rights to privacy under the Privacy Act 1988 (Cth) (“Act”) and the Australian Privacy Principles (APPs) contained in the Act and we comply with the Act’s requirements in respect of the collection, management and disclosure of your personal information. A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at www.aaic.gov.au

What is your personal information?

When used in this privacy policy, the term “personal information” has the meaning given to it in the Act. In general terms, it is any information that can be used to personally identify you. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

What personal information do we collect and hold?

When you visit the Site, we automatically collect certain information about your device, including information about your web browser, IP address, time zone, and some of the cookies that are installed on your device. Additionally, as you browse the Site, we collect information about the individual web pages or products that you view, what websites or search terms referred you to the Site, and information about how you interact with the Site. We refer to this automatically-collected information as “Device Information.”

We collect Device Information using the following technologies:

Cookies are data files that are placed on your device or computer and often include an anonymous unique identifier.

When you access our website or investor portal, we may send a “cookie” (A ‘cookie’ is a packet of information placed on a user’s computer by a website for record keeping purposes. Cookies are generally used on the Value Earth Fund website) to your computer. This enables us to recognise your computer each time you visit our website or investor portal without requiring you to register each time. It also enables us to keep track of products or services you view so that we can send you news about those products or services. We may also use cookies to measure traffic patterns, to determine which areas of our website or investor portal have been visited and to measure other behaviours and transaction patterns. We may use this to research our users’ habits so that we can improve our products and customer service. We use advertising companies to deliver our online advertising and digital marketing. When you see one of our ads on a third-party website or receive digital marketing from us, cookies are sometimes used to collect anonymous information

about what pages you visit and the type of software you are using. we use tracking companies to gather information about how people are using the Microequities website or investor portal, this information includes time of visit, pages visited, and some system information about the type of device you are using. We use this information to enhance the content and services offered on the site.

If you do not wish to receive cookies, you can set your browser so that your computer does not accept them. Each browser is different, so check the “Help” menu of your browser to learn how to change your cookie preferences.

We may log IP addresses (that is, the electronic addresses of device connected to the internet) to analyse trends, administer the website, track users’ movements, and gather broad demographic information.

Log files track actions occurring on the Site, and collect data including your IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps.

Web beacons, tags, and pixels are electronic files used to record information about how you browse the Site.

Additionally, when you make an enquiry or request information we collect certain information from you, including your name, address, email address, and phone number. We refer to this information as “Enquiry Information.”

When we talk about “Personal Information” in this Privacy Policy, we are talking both about Device Information and Enquiry Information.

We may collect the following types of personal information:

Name; mailing or street address; email address; telephone number; birth date; bank account information; investment details; tax file number; your financial interests and sometimes your financial position, if you are a customer or potential customer of ours; any additional information relating to you that you provide to us directly through our application forms or indirectly through use of our website, investor portal, digital marketing or online presence, through our representatives or otherwise; and information you provide to us through customer surveys, calls or visits by our representatives from time to time.

We may also collect some information that is not personal information because it does not identify you or anyone else. For example, we may collect anonymous answers to surveys or aggregated information about how users use our website. We are required to collect your name, address and date of birth under the Corporations Act 2001 (Cth). The Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) requires us to collect additional personal information from you.

We do not generally collect sensitive information about you unless required by applicable laws or rules. Sensitive information includes information relating to: race; political or religious beliefs; sexual preferences; criminal convictions; membership of professional or trade associations or unions; health information.

How do we collect your personal information?

We collect your personal information directly from you unless it is unreasonable or impracticable to do so. When collecting personal information from you, we may collect this information in many ways including: through our standard forms (for example, our application form); through your access and use of our website, investor portal and digital marketing; or during conversations between you and our representatives.

We may also collect personal information from third parties such as a financial planner or financial advisor including where information is missing from the application form that you or they send us. Phone calls to our staff may be recorded or monitored for quality control, training, regulatory or other compliance reasons.

What happens if we can't collect your personal information?

If you do not provide us with the personal information described above, we may not be able to process your application or conduct some or all the activities outlined below.

For what purposes do we collect, hold, use and disclose your personal information?

We collect personal information about you so that we can perform our business activities and functions and to provide best possible quality of customer service. We collect, hold, use and disclose your personal information for the following purposes: provide you with quality products or services; to assess your application; to process and administer your investment; to send communications requested by you; to provide you with access to the investor portal or other protected area of our website; to assess the performance of the website and to improve the operation of the website; to conduct business processing functions including providing personal information to our related bodies corporate, contractors, service providers or other third parties; to communicate with you on an ongoing basis about your investment and the market; to send you educational and marketing material about our other products and services we offer (you may contact us at any time to ask us not to send this information); to update our records and keep your contact details up to date; to process and respond to any complaint made by you; and to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a governmental or regulatory body of any country such as those relating to taxation and Anti-Money Laundering and Counter-Terrorism Financing.

Your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy.

Additionally, we use Enquiry Information that we collect generally to fulfil any enquiries placed through the Site to: Communicate with you; When in line with the preferences you have shared with us, provide you with information or advertising relating to our products or services.

We use the Device Information that we collect to help us screen for potential risk and fraud (in particular, your IP address), and more generally to improve and optimize our Site (for example, by generating analytics about how our customers browse and interact with the Site, and to assess the success of our marketing and advertising campaigns).

To whom may we disclose your information?

We may disclose your personal information to: our employees, related bodies corporate, contractors or service providers for the purposes of the operation of our business, fulfilling requests by you, and to otherwise provide products and services to you including, without limitation, custodians, registry providers, web hosting providers, IT systems administrators, mailing houses, printing companies, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants; suppliers and other third parties with whom we have commercial relationships, for business, marketing, and related purposes; a governmental or regulatory body (such as ASIC, ATO, AUSTRAC, the United States of America Securities and Exchange Commission and Inland Revenue Service or any other regulator or law enforcement agency located in Australia or elsewhere); any organisation where required to by a court order or under law; and any organisation for any authorised purpose with your express consent. For example, to your financial adviser or administrator or another person nominated by you.

We may combine or share any information that we collect from you with information collected by any of our related bodies corporate.

We share your Personal Information with third parties to help us use your Personal Information, as described above. For example, We use Google Analytics to help us understand how our customers use the Site. You can read more about how Google uses your Personal Information

here: <https://www.google.com/intl/en/policies/privacy/>. You can also opt-out of Google Analytics here: <https://tools.google.com/dlpage/gaoptout>.

As described above, we use your Personal Information to provide you with targeted advertisements or marketing communications we believe may be of interest to you. For more information about how targeted advertising works, you can visit the Network Advertising Initiative's ("NAI") educational page at <http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work>.

You can opt out of targeted advertising by:

FACEBOOK – <https://www.facebook.com/settings/?tab=ads>

GOOGLE – <https://www.google.com/settings/ads/anonymous>

BING – <https://advertise.bingads.microsoft.com/en-us/resources/policies/personalized-ads>

Additionally, you can opt out of some of these services by visiting the Digital Advertising Alliance's opt-out portal at : <http://optout.aboutads.info/>.

Do not track

Please note that we do not alter our Site's data collection and use practices when we see a Do Not Track signal from your browser.

Do we disclose your personal information to anyone outside Australia?

We may disclose personal information to our related bodies corporate and third party suppliers and service providers located overseas for some of the purposes listed above. We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

We may disclose your personal information to entities located outside of Australia, including the following: our data hosting and other IT service providers; and other third parties in jurisdictions including: Australia; Austria; Brazil; Canada; China; Denmark; France; Germany; Hong Kong; India; Indonesia; Ireland; Japan; Luxembourg; Malaysia; Mexico; Netherlands; New Zealand; Philippines; Russia; Singapore; South Africa; South Korea; Spain; Switzerland; Taiwan; Thailand; United Arab Emirates; United Kingdom; United States of America. – although it is not reasonably practicable to list all of the countries to which your personal information may be transferred from time to time.

Direct marketing materials

We may send you direct marketing communications and information about our products and services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS, fax and email, in accordance with applicable marketing laws, such as the Spam Act 2003 (Cth). You consent to us sending you those direct marketing communications by any of those methods. If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so. In addition, at any time you may opt-out of receiving marketing communications from us by contacting us (see the details below) or by using opt-out facilities provided in the marketing communications and we will then ensure that your name is removed from our mailing list.

We do not provide your personal information to other organisations for the purposes of direct marketing.

Data retention

When you make an Enquiry through the Site, we will maintain your Enquiry Information for our records unless and until you ask us to delete this information.

The Site is not intended for individuals under the age of 18.

How can you access and correct your personal information?

You may request access to any personal information we hold about you at any time by contacting us (see the details below). Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you). We may charge you a fee to cover our administrative and other reasonable costs in providing the information to you. We will not charge for simply making the request and will not charge for making any corrections to your personal information.

There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it.

European residents

If you are a European resident, you have the right to access personal information we hold about you and to ask that your personal information be corrected, updated, or deleted. If you would like to exercise this right, please contact us through the contact information below.

Additionally, if you are a European resident we note that we are processing your information in order to fulfil contracts we might have with you (for example if you make an investment in our Funds), or otherwise to pursue our legitimate business interests listed above. Additionally, please note that your information will be transferred outside of Europe, including to Canada and the United States.

Security

We take reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorised access, modification or disclosure. We may hold your information in either electronic or hard copy form. Personal information may be destroyed or de-identified when no longer needed.

As our website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

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 your Personal Information. However, 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.

What is the process for complaining about a breach of privacy?

If you believe that your privacy has been breached, please contact our Privacy Officer using the contact information below and provide details of the incident so that we can investigate it. We request that complaints about breaches of privacy be made in writing, so we can be sure about the details of the complaint. We will attempt to confirm as appropriate and necessary with you your understanding of the conduct relevant to the complaint and what you expect as an outcome. We will inform you whether we will conduct an investigation and the estimated completion date for the investigation process.

After we have completed our 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 advise if we have changed our view.

Changes to our privacy policy

We may update this privacy policy from time to time. Any updated versions of this privacy policy will be posted on our website. Please review it regularly. This privacy policy was last updated on May 24, 2018.

Contacting us

If you have any questions about this privacy policy, any concerns or a complaint regarding the treatment of your privacy or a possible breach of your privacy, please use the contact link on our website or contact our Privacy Officer using the details set out below. We will treat your requests or complaints confidentially. Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in a timely and appropriate manner.

Please contact our Privacy Officer at:

Privacy Officer / Microequities Asset Management Group Limited

Post: Suite 3105, Governor Macquarie Tower, 1 Farrer Place Sydney NSW 2000

Phone: 02 9009 2900 / e-mail: compliance@microequities.com.au