

# Privacy Policy

---

## Internal Policy Document

## CONTENTS

1.	Your privacy is important.....	3
2.	Personal information .....	3
3.	Sensitive information .....	3
4.	Personal information we collect .....	3
5.	Purposes for which we collect, hold, use and disclose personal information.....	4
6.	Security of your personal information.....	5
7.	How you can access and correct your personal information held by us .....	5
8.	Keeping your personal information up to date .....	5
9.	Transfer of your personal information outside Australia .....	6
10.	Accuracy, currency, and completeness of information .....	6
11.	How can you complain about a breach of privacy? .....	6
12.	Request a copy of this Privacy Policy and further information .....	7
13.	Changes to this Privacy Policy .....	7

This is the Privacy Policy (**Policy**) for Guildfords Funds Management Pty Ltd (ACN 602 779 993) (AFSL No. 471379) (**Guildfords, we, us or our**). Guildfords is the trustee of the Valara Partners Fund (**Fund**) and Valara Funds Management Pty Ltd (ACN 615 946 908) (Authorised Representative No. 01252452) (**VFM or Manager**) is the Manager of the Fund.

As the trustee of the Fund, Guildfords and its partners collect your personal information for the purpose of providing its services, as detailed in the Information Memorandum. Guildfords may disclose your personal information, such as your name and contact details, along with your account information, to its related bodies corporate, professional advisers, and/or as otherwise required. Your personal information will be used in accordance with Guildfords' Privacy Policy, which contains information about how you may access or correct your personal information held by Guildfords and how you may complain about a breach of the Australian Privacy Principles.

## 1. Your privacy is important

At Guildfords your right to privacy is important. Guildfords is subject to the National Privacy Principles ("NPPs") under the Privacy Act 1988 (Privacy Act). The following statement outlines how Guildfords manages personal information that it holds about individuals in accordance with the NPPs.

## 2. Personal information

Personal information is any information or an opinion about you (whether true or not) from which Guildfords can determine your identity. The types of information that we collect and hold about you could include:

- (a) ID information such as your name, postal or email address, telephone numbers, and date of birth;
- (b) financial details such as your tax file number; and
- (c) other information which we think is necessary.

## 3. Sensitive information

When personal information concerns certain matters it is considered sensitive information. It is information or opinion about your:

- (a) racial or ethnic origin;
- (b) political opinion;
- (c) membership of a political association;
- (d) religious beliefs, affiliations or philosophical beliefs;
- (e) membership of a professional or trade association or membership of a trade union;
- (f) criminal record; and
- (g) financial records.

Guildfords will only collect, use or disclose sensitive information about you in accordance with the law. In most cases, Guildfords will only collect, use or disclose sensitive information where it has received your consent.

## 4. Personal information we collect

When you make an application to invest in the Trust, we will collect personal information from you in the Application Form. We may also collect additional personal information from you by other means in the future, including through forms, through our website and by telephone if you access our investor services.

Generally, Guildfords collects personal information directly from you. For example, it collects personal information when you:

- (a) deal with Guildfords in person, by telephone, letter, fax or email;
- (b) supply a resume;
- (c) submit any other information in connection with your application for registration.

Personal information about you may also be collected from a third party. For example, when Guildfords receives:

- (d) Any credit information about you. The main sources of credit information are:
  - your co-loan applicants or co-borrowers;
  - your guarantors/proposed guarantors;
  - your employer, accountant, real estate agent or other referees;
  - your agents and other representatives like the person who referred your business to us, your solicitors, conveyancers and settlement agents;
  - organisations that help us to process credit applications;
  - organisations that check the security you are offering such as valuers;
  - bodies that issue identification documents to help us check your identity; and
  - our service providers involved in helping us to process any application you make for credit through us.
- (e) any reference about you;
- (f) results of inquiries of former employers, work colleagues, professional associations or registration body;
- (g) the results of any competency or medical test;
- (h) performance feedback (whether positive or negative);
- (i) any complaint from or about you in the workplace;
- (j) any information about any insurance investigation, litigation, registration or professional disciplinary matter, criminal matter, inquest or inquiry in which you are involved.

If Guildfords does not have your prior consent, it will take reasonable steps to inform you that it has collected personal information from a third party and ensure you are aware of the purposes for which Guildfords has collected your personal information.

If you don't provide your information to us, it may not be possible for us to give you the assistance you seek, to verify your identity or protect against fraud or to let you know about other products or services that might be suitable for your financial needs.

## 5. Purposes for which we collect, hold, use and disclose personal information

Guildfords may use and disclose the personal information it collects about you for the following purposes:

- (a) for purposes for which you have engaged Guildfords.

Guildfords may disclose some of your personal information to:

- (a) Regulatory bodies and/or clients of Guildfords;
- (b) Referees.

Guildfords may also disclose your personal information to a third party if they have a proper interest in the disclosure, such as:

- (a) other members of the Guildfords Group;
- (b) Guildfords' insurers;
- (c) a professional association or registration body;

- (d) the mortgage aggregator through whom we may submit loan or lease applications to lenders or lessors on the mortgage aggregator's panel;
- (e) referrers that referred your business to us;
- (f) valuers;
- (g) lenders, lessors, lender's mortgage insurers and other loan or lease intermediaries;
- (h) organisations, like fraud reporting agencies, that may identify, investigate and/or prevent fraud, suspected fraud, crimes, suspected crimes, or other misconduct;
- (i) government or regulatory bodies (including ASIC and the Australian Tax Office) as required or authorised by law. In some instances, these bodies may share the information with relevant foreign authorities;
- (j) guarantors and prospective guarantors of your loan or lease;
- (k) service providers, agents, contractors and advisers that assist us to conduct our business;
- (l) any organisation that wishes to take an interest in our business or assets; and
- (m) any third party to which you consent to us sharing your information.

If Guildfords engages a third-party contractor to perform services which involves handling personal information, it takes reasonable steps to prohibit the contractor from using personal information except for the purposes for which it was supplied.

If you do not give Guildfords the information it seeks, it is unable to provide you with services.

## 6. Security of your personal information

Guildfords holds personal information in a combination of secure computer storage facilities and paper-based files. Guildfords has security procedures in place to protect the personal information it holds from misuse, loss, unauthorised access, modification or disclosure. Guildfords uses a number of processes to protect your personal information including:

- (a) locks and security systems;
- (b) computer pass words and limited access to shared network drives to authorised staff;
- (c) virus checking;
- (d) auditing procedures and data integrity checks;
- (e) recording of file movements; and
- (f) security classification to identify information needing special protection.

Guildfords will keep your personal information no longer than necessary. Guildfords will appropriately dispose of your personal information so that it is protected from unauthorised use or disclosure.

## 7. How you can access and correct your personal information held by us

You may request access to any personal information Guildfords holds about you, subject to the Privacy Act. Your request to obtain access will be dealt with in a reasonable time. Guildfords may charge a fee to cover the reasonable costs of retrieval and supply of the information to you.

Guildfords is not always required to provide you with access to your personal information on request. Guildfords may refuse your access to personal information in a number of circumstances, such as where denying access is required or authorised by law or where the request is vexatious or frivolous.

If Guildfords denies your request for access it will provide you with reasons for the refusal.

## 8. Keeping your personal information up to date

Guildfords takes reasonable steps to ensure that your personal information is accurate, complete and up to date. Guildfords may also contact you from time to time to check that the information is still correct.

You can also request access to or seek correction of your personal information by notifying us in writing at any time (including by facsimile and email) or by phone, subject to passing our security checks.

If you are able to establish that personal or sensitive information Guildfords holds about you is not accurate, complete and up to date, Guildfords will take reasonable steps to correct it.

If Guildfords is unable to agree that the personal information it holds about you is accurate, complete and up to date, you may ask Guildfords to place with the information, a statement by you claiming that the information is not accurate, complete and up to date.

## 9. Transfer of your personal information outside Australia

Guildfords does not transfer your personal information outside Australia unless it is authorised to do so by law or you have consented to it as part of the recruitment services it provides to you.

Guildfords may store your personal information on a server overseas. By providing personal information via Guildfords' website you agree your information may be transferred to servers located overseas.

## 10. Accuracy, currency, and completeness of information

We will endeavour to ensure your personal information is kept accurate, complete, up to date and relevant. Please let us know if any of your details change. If you feel your personal information is not accurate, complete or up to date, then please notify us and we will take reasonable steps to ensure it is corrected. You can contact us using the details listed below.

We will consider if the information requires amendment. If we do not agree that there are grounds for amendment then we will add a note to the personal information stating that you disagree with it.

## 11. How can you complain about a breach of privacy?

If you have a complaint about a breach of this Privacy Policy including the manner in which we have collected, held, used, disclosed, kept, or given people access to your personal information, then you may make a complaint to us using the contact details set out below. You will need to provide us with sufficient details regarding your complaint and any supporting evidence.

Your complaint will be referred to our Privacy Officer who will investigate the issue and determine the steps we will take to resolve your complaint. We may ask you to provide additional information.

We will notify you in writing of our determination, generally within 30 days. If you are not satisfied with our determination or you do not receive a response within 30 days, then you can contact us to discuss your concerns and you can refer the complaint to the Office of the Australian Information Commissioner [www.oaic.gov.au](http://www.oaic.gov.au).

## 12. Request a copy of this Privacy Policy and further information

You can request a copy of the Privacy Policy to be sent to you :

- (a) by email, by emailing your request to [info@guildfords.com.au](mailto:info@guildfords.com.au) or
- (b) by post, by writing to us.

Guildfords Funds Management Pty Ltd

Telephone: 03 9663 5355

Email: [info@guildfords.com.au](mailto:info@guildfords.com.au)

Website: [www.guildfords.com.au](http://www.guildfords.com.au)

Address: Level 3, 175 Collins Street, Melbourne, Victoria 3000

If you have any further questions relating to this Privacy Policy, or concerns about the way in which we have handled your personal information, then please contact us.

## 13. Changes to this Privacy Policy

This Policy may change. Guildfords reserves the right to amend or modify this statement from time to time. We will let you know of any changes to this Policy by posting a notification on our website, correspondence via post or email, or you may contact us for a copy of the most up to date policy at any time.