

Privacy Framework

Aitken Investment Management Pty Limited



Aitken Investment Management Pty Limited and other members of the Aitken Investment Management group (together “we” or “AIM”) are committed to safeguarding the personal information that we receive in the course of business. This Privacy framework sets out the manner in which AIM will safeguard the privacy of this personal information and comply with the Australian Privacy Principles (“APPs”) and the Privacy Act 1988 (Cth) (“Privacy Act”).

Relevant definitions are set out in Appendix 1. The privacy policy set out in Appendix 2 (“Privacy”) is the public statement of how AIM deals with personal information and shall be made available on the AIM website and to any person who requests the policy. AIM shall provide this privacy policy free of charge. The information in this framework sets out additional policies and procedures that are not appropriate for the Privacy Policy.

AIM business

AIM a specialist investment manager focusing on delivering distinct high conviction investment solutions to sophisticated investors. AIM operates an Australian unit trust, the AIM Global High Conviction Fund (“Fund”).

The registry appointed by AIM collect the personal information and deal with the investors. AIM will receive personal information about investors in the Fund. AIM may receive personal information about investors in the Baruch Fund of which it is investment manager however this will not typically be the case.

Personal information received

A key aspect of the framework is to identify the type of personal information AIM receives. AIM typically collects personal information from the following sources:

| From whom personal information is collected | The kinds of information collected | The purposes for which AIM holds, use and discloses personal information | From whom personal information is obtained |
|--|---|---|--|
| Actual and prospective investors (and their staff and representatives) in the Fund | Typically name, DOB, contact details, bank account details, distribution reinvestment preferences, Tax File Numbers | To facilitate the investment by the investor and to comply with relevant laws, for example anti-money laundering and counter terrorism financing laws | The investor or their representatives. The information may also be made available by the registrar of the fund |
| Service providers, advisers, suppliers and other business contacts | Typically includes name and business contact details | To facilitate the relevant relationship with the investor (eg source a service) | The relevant parties or by means of referrals |
| Visitors to AIM website | Cookies ie browser type, internet service provider | To facilitate usage of website | From the individual’s computer |
| Email, mail and telephone correspondence from the general public | Typically includes name and contact details | To deal with the correspondence | The relevant individual |

AIM does not typically collect any sensitive information or personal information as this information is not received or relevant to its business.

AIM will take reasonable steps to ensure that the personal information collected is accurate, up-to-date and complete. AIM will ensure that personal information about an individual is obtained from that individual or a person who has documented evidence of an authority to act on behalf of that individual.

Privacy Officer

AIM has appointed Les Andrews as the Privacy Officer. The Privacy Officer has primary responsibility for ensuring compliance with the Privacy Act.

Anonymity and use of pseudonyms

AIM will not deal with individuals on an anonymous basis or through the use of a pseudonym as it would be impracticable and may be illegal for AIM to deal with the individual on this basis. For example, anti-money laundering and counter terrorism financing laws require the identification of investors.

Unsolicited personal information

Where we receive personal information which we did not ask for, we will, within a reasonable period of time, determine whether we could have collected the information lawfully under Privacy Act. If not, we will destroy the information and de-identify it where it is otherwise lawful to do so. Otherwise, the information will be subject to the privacy policy.

Personal information that is no longer needed

The APPs require us to assess when we no longer need the personal information we have collected for any purpose for which it may be used or disclosed in accordance with this Privacy Framework. When we determine that the personal information is no longer necessary for these purposes, the APPs require it to be destroyed or de-identified where permitted by law. The purpose for which we obtain personal information may survive for extended periods. As an example, personal information about investors in Fund may be required even after the investor has redeemed from the product. This could be for taxation reasons, in case of dispute or litigation or in case there are windfall gains that must be distributed to investors. Accordingly, AIM has adopted a policy of maintaining personal information for at least 7 years.

Correction of information

If AIM determines personal information about an individual is not accurate, up to date, complete, relevant or is misleading, or has received a request to correct such information from an individual, AIM will take reasonable steps to correct that information to ensure that, having regard to the purpose for which it is held, the information is accurate, up to date, complete, relevant and not misleading. If an individual requests, AIM will take reasonable steps to notify third parties of any corrections to that individual's personal information.

APPENDIX 1

Key terms – Privacy Act

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- a. whether the information or opinion is true or not; and
- b. whether the information or opinion is recorded in a material form or not.

Health information means:

- a. information or an opinion about:
 - i. the health or a disability (at any time) of an individual; or
 - ii. an individual's expressed wishes about the future provision of health services to him or her; or
 - iii. a health service provided, or to be provided, to an individual;
- b. that is also personal information; or
- c. other personal information collected to provide, or in providing, a health service; or
- d. other personal information about an individual collected in connection with the donation, or intended donation, by the individual of his or her body parts, organs or body substances; or
- e. genetic information about an individual in a form that is, or could be, predictive of the health of the individual or a genetic relative of the individual.

Sensitive information means:

- a. information or an opinion about an individual's:
 - i. racial or ethnic origin; or
 - ii. political opinions; or
 - iii. membership of a political association; or
 - iv. religious beliefs or affiliations; or
 - v. philosophical beliefs; or
 - vi. membership of a professional or trade association; or
 - vii. membership of a trade union; or
 - viii. sexual preferences or practices; or
 - ix. criminal record;that is also personal information; or
- b. health information about an individual; or
- c. genetic information about an individual that is not otherwise health information.

APPENDIX 2

Website and hardcopy disclosure

Privacy Policy

Aitken Investment Management Pty Limited and other members of the Aitken Investment Management group (together “we” or “AIM”) are committed to safeguarding the personal information that we receive. AIM will hold personal information in confidence in accordance with the Australian Privacy Principles (“APPs”) and the Privacy Act 1988 (Cth) as amended (“Privacy Act”).

What is personal information?

Under the Privacy Act, personal information is information or an opinion, whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

What personal information do we collect and why do we collect it?

AIM (through the registrar of its investment products) may collect personal information from investors in AIM investment products from the investor (including their staff and representatives). This information includes, but is not limited to, name, date of birth, contact details, gender, Tax File Number, country of residence, investment information and bank account information. We collect this information to facilitate your investment in the relevant product and to comply with relevant laws, for example anti-money laundering and counter terrorism financing laws. We collect this information directly from the investor (or their staff and representatives) and not from third parties.

AIM may also collect personal information from people we do business with in order to fulfil the relevant business purpose. This will usually happen when we collect the name and business contact details of a person who is an adviser, supplier or other business contact. We collect this information to facilitate the relevant business purpose. AIM may also collect personal information from people who send us correspondence. Information collected includes name and contact details. We collect this information to deal with correspondence. We collect this information directly from the relevant individuals and not from third parties.

We will not generally collect sensitive (for example information on race, religion) or health information.

What if the information is incomplete or inaccurate?

AIM may not be able to provide you with the products you are seeking.

How do we use and disclose personal information?

We use an investor’s personal information to facilitate their investment in our investment product. Investors are deemed to have consented to such information being processed for the purposes referred to above and for receiving additional information about the full range of services offered by AIM and its affiliates. Other personal information will be used to facilitate the business purpose for which it is provided. AIM may disclose the information to its affiliates and service providers. Where we disclose information to a third party, confidentiality arrangements will be in place.

Personal information will not typically be disclosed overseas unless required by relevant law.

AIM may be required by relevant laws to disclose personal information to a regulator (such as the Australian Taxation Office) or to a court or tribunal.

How do we protect the confidentiality of personal information?

We will take reasonable steps to ensure that any identifiable personal information that we have collected is stored securely. The measures utilised include password protection to our systems, restricting access to our systems and education of staff.

Our website

Our website may collect non-personal information when you visit our website. Our website also uses cookies. A 'cookie' is a packet of information that allows the server (the computer that houses the web site) to identify and interact more effectively with your computer. This information does not typically identify individual users and it is unlikely to be personal information.

Links to other websites

Our website may have links to external third party websites that may benefit the user. External websites should contain their own privacy statements and we recommend you review them when using their websites. Please note, however, that third party websites are not covered by our Privacy Policy and these websites are not subject to our privacy standards and procedures.

Access to personal information, corrections and complaints

You have a right to access any personal information we hold about you (although there are some exceptions to this) and correct any personal information that may be incorrect by contacting AIM at the address below. We may deny such a request in some circumstances, if we do this we will explain why.

Please note that the personal information we hold about you will be information that you (or your representative) have provided.

AIM will respond to requests for access or correction within a reasonable time. AIM may ask you to pay its reasonable costs of responding to your request.

You may also make a complaint to AIM concerning a breach of the Privacy Act by writing to the address below. We will acknowledge complaints and provide a final response within 45 days of receipt of the complaint.

Additional information

AIM may change this Privacy Policy at any time. We will make this Privacy Policy available to anyone who requests it, free of charge, either at our offices or through our website.

For further information about privacy issues, see the Office of the Australian Information Commissioner's website at www.oaic.gov.au.

If you have a privacy concern, complaint or query, please contact +[insert number] or by mail at:

*Privacy Officer
Aitken Investment Management Pty Limited
Level 57
MLC Centre
14 Martin Place
Sydney NSW 2000
Australia*

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