

Privacy Policy

Brentridge Capital Pty Ltd (“Brentridge”, “we”, “us” or similar pronouns)

ABN 42 629 624 700

Corporate Authorised Representative (CAR#001269419) of Finexia Wealth Pty Ltd (ACN 637 420 672, AFSL 522661).

About this Policy

This policy describes how we collect, hold, use and disclose your personal information under applicable Privacy Laws. Brentridge bound by the Privacy Act 1988 (Cth) (‘Privacy Act’) and we manage and protect your personal information in accordance with the Australian Privacy Principles (APPs).

Why do we need your personal information?

Protecting your personal information is important to us and we will only collect information which is reasonably necessary for our business or activities. For In this policy, personal information is any information that could identify you or be used to establish your identity.

How do we use your personal information?

We collect, hold, use and disclose personal information as is reasonably necessary for our business or activities, and to comply with legal and regulatory obligations. We may also collect, use and disclose your information for purposes related to (without limitation):

- Providing services or advice to our related bodies corporate, including Bergen Asset Management, LLC and the investment vehicles it manages
- Providing services or advice to third parties
- Marketing on behalf of our related bodies corporate
- Marketing on behalf of third parties
- Arranging for services to be provided by our affiliates or third parties
- Complying with our legal obligations, such as verifying your identity
- Assisting with your questions and complaints
- Internal operations, such as record keeping, data analytics, auditing or training

We collect, use, hold and sometimes disclose personal information entities or individuals with whom we conduct business (including their employees) in order to administer and manage our business operations. This information is afforded the same standard of care as that of our clients.

Will my personal information be used for direct marketing?

We may use your personal information for marketing on behalf of our related bodies corporate. However, if you receive any marketing material, such material will generally have been sent to you in your capacity as a director, officer, employee or agent of a company for which you act as a director, officer, employee or agent, and not in your personal capacity. You can opt out of receiving direct marketing information from us at any time (see the section ‘How can you contact us about privacy?’).

What happens if I do not provide information that has been requested?

We typically do not request that you provide your personal information. However, if we do request your personal information from you, it's your choice whether to provide your personal information. .

What types of personal information do we collect?

The types of information we collect could include (but is not limited to):

- information which identifies you (your name, date of birth, contact details, residence and citizenship status);
- information which relates to your financial affairs, business, employment, income or assets;
- information which arises or is required in connection with the transactions you do with us or through us; and
- information relevant to marketing.

How do we collect personal information?

We collect your personal information from external sources. The people, agencies or organizations that may provide us with information are:

- Public sources of information (such as websites and ASX announcements)
- Proprietary sources of information (such as financial data sources)
- Market research organizations
- Social media websites
- Other third-party websites, including business-to-business contact database websites
- Employers, when a new employee joins their superannuation plan
- Persons authorised by you (such as lawyers or accountants)
- Other credit providers
- Credit reporting bodies
- Agencies such as the Australian Taxation Office

We only collect your information from external sources when we are permitted to do so.

We also collect personal information directly from you. We gather this information by recording the information you provide via emails, phone calls and other interactions.

Can you remain anonymous or use a pseudonym when dealing with us?

You may request to remain anonymous or to use a pseudonym when dealing with us. We may be unable to fulfil that request.

How do we protect your personal information?

We keep your personal information in your client files or electronically. We hold your personal information in a combination of secure computer storage facilities, paper-based files and other formats.

We take a number of steps to protect personal information from misuse, loss, unauthorised access, modification or improper disclosure. These include limiting access of personal information to authorised personnel only and training staff who handle personal information on the importance of maintaining the confidentiality of personal information and the privacy of individuals.

When we don't need your personal information anymore, we will delete, destroy or de-identify it. In the unlikely event of a data breach, we have measures in place to manage and respond to data breaches, which includes the notification to impacted individuals and data protection authorities globally, where required.

Who do we share personal information with?

From time to time, we may share your personal information with other entities or individuals. The entities that we might share your personal information with vary according to the service involved, but could include:

- Our related bodies corporate, including Bergen Asset Management, LLC and the investment vehicles it manages
- Service providers, advisers or vendors we or our related bodies corporate may engage to provide us or our related bodies corporate with services such as administrative, audit, financial, insurance, legal or research services, some of whom may contact you on our behalf
- Our advisory clients
- Our or our related bodies corporate's third party data storage providers
- Insurers, including reinsurance companies, and credit providers
- Courts, tribunals and other dispute resolution bodies in the course of a dispute
- Credit reporting or reference agencies
- Anyone authorised by you or to whom you have provided your consent (either expressly or impliedly)
- Anyone to whom we, or our related bodies corporate or service providers, are required or authorised by law to disclose your personal information (for Brentridge, law enforcement agencies, and national and international government and regulatory authorities including but not limited to the Australian Taxation Office, the Australian Prudential Regulation Authority, the Australian Securities and Investments Commission, the Australian Transaction Reports and Analysis Centre and the United States Internal Revenue Service)
- Other financial services institutions in order to detect, investigate or prevent actual or potential fraud in connection with the services or advice we provide

Do we send personal information to overseas recipients?

Some of the entities that we share information with may be located in, or have operations in, other countries. For example, we are a related bodies corporate of Bergen Asset Management, LLC, with whom we share information. Further, in some circumstances, we or our related bodies corporate use third party service providers located overseas to carry out its functions and provide services. This means that your information might end up stored or accessed in overseas countries, including the United States and the United Kingdom.

When we send your personal information to overseas recipients, we make sure appropriate data handling and security arrangements are in place.

We may store, process or back-up your personal information on servers that are located overseas (including through third party service providers).

How do we update your personal information?

We will update your personal information if you contact us. In most cases you can update your personal information via email.

We may update your personal information if we believe the personal information we hold is incomplete or out of date. We may seek to correct or complete our records by gathering data from other sources such as public records and other organizations.

How can you contact us about privacy?

You can send an email to privacy@brentridgecapital.com.au, or write to us at Brentridge Capital Pty Ltd, Level 15, Grosvenor Place, 225 George Street, Sydney, NSW 2000, to:

- Seek more information about anything contained in this policy, or to request a printed copy of this policy
- Update or correct your personal information
- Opt out of receiving direct marketing material
- Ask about accessing or correcting the personal information we hold about you; or
- Make a privacy related complaint.

How do you find out about your personal information we hold?

You can access the personal and credit information that we hold about you by calling, emailing or writing to us (see how you can contact us about privacy). We'll do our best to respond within 30 days; if it's going to take longer, we'll get in touch to let you know why and ask for more time.

There are some situations where we are allowed to refuse or limit your access to information, when the information is commercially sensitive. If that happens, we'll write to you and let you know why.

There is no charge for making a request to access your personal information. However, in some cases there may be a charge to cover the time we spend locating, compiling and explaining the information you ask for. If there is a charge, we'll give you an estimate up front and confirm that you wish for us to proceed.

How can you make a complaint about privacy?

If you ever have an issue or complaint in relation to privacy, please contact us via email or letter.

We take privacy related complaints very seriously and consider all complaints carefully as part of our commitment to being open, honest and fair in dealing with your concerns. We'll contact you within five working days of receiving your complaint to let you know what actions we are taking regarding the matter.

How can you escalate unresolved privacy complaints?

If you feel your complaint has not been satisfactorily addressed in the first instance, or that it is taking too long to resolve, you can ask for your concerns to be escalated to the Brentridge Capital Privacy Officer by email to privacy@brentridgecapital.com.au or write to: The Brentridge Capital Privacy Officer, Level 15, Grosvenor Place, 225 George Street, Sydney, NSW 2000.

Alternatively, you can contact an external body:

- If your complaint is about how we handle your personal information you can contact the Office of the Australian Information Commissioner – call 1300 363 992 or find them online at oaic.gov.au.
- If your complaint is about the services we provide you can contact the Australian Financial Complaints Authority – call 1800 931 678, in writing to Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001 or online at info@afca.org.au. There may be a time limit for referring your complaint to AFCA. You should contact them or visit their website for more details.

What about privacy and the internet?

This statement is specific to the brentridgecapital.com.au website.

Cookies

Cookies are small pieces of text stored on your computer to help us determine the type of browser and settings you are using, where you have been on the website, when you return to the website, where you came from, and to ensure your information is secure. We may use external service providers to track the traffic and usage on the website. Cookies are frequently used on many websites on the internet and you can choose if and how a cookie will be accepted by changing your preferences and options in your browser. You may not be able to access some parts of our websites if you choose to disable the cookie acceptance in your browser, particularly the secure parts of the website. We therefore recommend you enable cookie acceptance to benefit from all the services on the website.

Website analytics

Website analytics measurement software is used to assist in tracking traffic patterns to and from our websites, anonymously surveying users of the sites. The system is used to collect such information as the number of unique visitors, how long these visitors spend on the website when they do visit, and common entry and exit points into and from the website.

This non-personal information is collected and aggregated by third party software and provided to us to assist in our analysis of our websites.

About this policy

This policy is effective as of 17 September 2025. We will update this policy when our information handling practices change, and any amendments will apply to the information we hold at the time of the update. We will post the updated policy on our website; we encourage you to check our website from time to time to view our current policy, or contact us for a printed copy.