



PRIVACY POLICY

This is the Privacy Policy of Fairway Capital Management Pty Ltd. Your personal information is important to us which is why we have a clear policy to ensure your privacy is protected. Your personal information will be treated strictly in accordance with the Australian Privacy Principles in the *Privacy Act 1988* (Cth) and the *Privacy Amendment (Enhancing Privacy Protection) Act 2012*.

THE INFORMATION WE COLLECT

Fairway Capital Management collect personal information that we believe is necessary to deliver our services or products or otherwise for our primary business functions and/or activities. Ordinarily we only collect information about you when you provide it to us, or it is provided to us with your authority.

We collect personal information by lawful and fair means and not in an unreasonably intrusive way. The types of personal information we collect generally include your name, address, telephone number, email address, financial information, other contact or identification details and, in some cases, information necessary to make or receive payments to or from you or necessary to effect transactions in financial products on your behalf.

We will collect personal information directly from you when you apply for a product or a service, deal with us over the telephone or in person, send us a letter or email or visit our website. On occasions, we may collect personal information about you from third parties, for example, share registries, ASIC and identification service providers.

In the absence of personal information that we reasonably request, we may not be permitted under the law to provide services to you, you may not receive payments owing to you as efficiently as possible, or we may not be able to communicate with you.

Apart from the necessity to collect your information to provide a service to you, or maintain our relationship with you, the purposes for which we would generally collect and use your personal information will include:

- Complying with legislative and regulatory requirements
- Performing our administrative operations, including accounting, risk management, recordkeeping, archiving, systems development and testing and staff training
- Conducting market or customer satisfaction research

- Inviting you to other events that may interest you
- Developing and identifying products and services that may interest you; and
- Telling you about other products and services we offer (unless you ask us not to).

PERSONAL INFORMATION ABOUT THIRD PARTIES

If you provide Fairway Capital Management with personal information about another person, you represent that you are authorised to do so and agree to inform that person who Fairway Capital Management is and that we will use and disclose the information for the relevant purposes set out below, and that they can access the information we hold about them if they contact us.

DISCLOSURE OF PERSONAL INFORMATION

You authorise Fairway Capital Management to provide necessary information to related companies, affiliates and any agents or contractors who provide services to us in connection with the provision of products or services you have sought from us. These parties are prohibited from using your personal information except for the specific purpose for which we supply it to them.

Subject to what is permitted by law, the types of third parties we may disclose your personal information to include:

- Fairway Capital Management contractors, insurers and external advisers we engage from time to time to carry out or advise on, our services and activities
- Any person or organisation who introduces you to us
- The Trustee of the Fund, One Investment Group and subsidiary One Registry Services and Unity Fund Services, to manage Fairway Capital Management funds administration, reporting, unit registry, auditing and compliance services.
- Regulatory bodies, government agencies, law enforcement bodies and courts.
- ASX Limited (under the ASX Operating Rules) and the information may be used by ASX for its purposes (for example, in the course of ASX's compliance activities);
- Other financial institutions: and any person to the extent necessary in our view, to carry out the instructions you give us.

PURPOSE AND USE OF PERSONAL INFORMATION

Information collected may be used to do one or more of the following:

- Open an account for you
- Maintain your account
- Process transactions on your behalf
- Enable us to assess any request from you for financial advice
- Send research information to you
- Respond to any specific requests you may contact us about

- Help us to assess products that may suit your financial needs
- Notify you of any products that may be of interest to you
- Keep you informed on matters that may affect or be related to your investments
- Update your personal files
- Enable us to meet our obligations under certain laws
- To assist you in determining your investment objectives and providing you with investment advice and information on new opportunities to assist you in achieving these objectives
- To provide you with regular reviews and keep you informed on the performance of your investments
- Any purpose for which the information was requested and any directly related purpose
- Developing, improving and marketing our products and services

WEBSITE

Fairway Capital Management compliance obligation with the Australian Privacy Principles also extends to when you use our website. Our website terms and conditions and any privacy notices are clearly posted on all pages of the website.

Where you use a link from the Fairway Capital Management website to the websites of third parties, those websites are not subject to our Privacy Policy. Those third parties are responsible for informing you of their own privacy policies.

For statistical purposes we may collect information on website activity (such as the number of users who visit the website, their country, the date and time of visits, the number of pages viewed, navigation patterns and the operating systems and browsers used to access the site).

This information on its own does not identify an individual but it does provide us with statistics that we can use to analyse and improve our website. We also use cookies and measurement tools on our website, as do third parties such as analytics, who may monitor unidentifiable statistics relating to website access and usage.

We use and disclose the unidentifiable information collected through the use of cookies and measurement tools in accordance with this Privacy Policy. This includes using the information to report statistics, analyse trends, diagnose problems and improve the quality of our products and services. We may combine our cookies and information (collected through the cookies and measurement tools) on this website with other information (including information collected by third parties using their own cookies and measurement tools) to provide better or more relevant services and information.

If an individual does not want information collected through the use of cookies and/or measurement tools, they may be able to delete or reject cookies and/or some of the measurement software features through their browser or the settings section of their mobile or tablet device. Disabling these features may cause some of the functions on the websites to work less effectively.

Links to external websites, as well as to third party websites that allow interaction and sharing of content including social media buttons such as Facebook share, Twitter, Pinterest, Instagram and Google+. These linked sites, applications and widgets are not under our control and we do not accept responsibility for the conduct of companies linked to our websites, or their collection of information through these third party applications or widgets. Before disclosing information on any other website, or using these applications or widgets users are advised to examine the terms and

conditions of using that website and the relevant third party's data collection practices and privacy policy.

The Internet is not always a secure method of transmitting information. While Fairway Capital Management take reasonable steps to ensure all information it receives is maintained securely, Fairway Capital Management cannot ensure that communications conducted via the Internet will be secure.

ACCESSING YOUR PERSONAL INFORMATION

We will take reasonable steps to ensure that your personal information is accurate, complete and up to date at all times. If at any time you wish to know what personal information we are holding about you, or you wish to update your information. The appropriate contact is:

The Privacy Officer,
Fairway Capital Management PTY LTD
11 West Street BURLEIGH HEADS QLD 4220
partner@fairwaycap.com.au

Under certain circumstances we may not be able to tell you what personal information we hold about you. This includes where the information:

- Relates to suspicions of unlawful activity, or misconduct of a serious nature and giving access would be likely to prejudice the taking of appropriate action in relation to the matter by Invest Trading & Advisory or an enforcement body;
- Would have an unreasonable impact on the privacy of another individual;
- Relates to existing or anticipated legal proceedings with you;
- Would reveal a commercially sensitive decision-making process or evaluative information; or
- Prevents us by law from disclosing the information, or providing access which would prejudice certain investigations.

SECURITY OF YOUR PERSONAL INFORMATION

Fairway Capital Management will take reasonable steps to protect the personal information we hold from misuse and loss, and from unauthorised access, modification or disclosure. In line with our internal authorisation and access policies, employees only have access to information on a need to know basis.

We take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed. However, no data transmission over the internet can be guaranteed as fully secure and we cannot guarantee or warrant the security of any information you send to us over the internet. You submit information over the internet at your own risk.

MARKETING

Fairway Capital Management may use your personal details, including your address and/or email address, to provide you with newsletters and information about products, services or other events that may be of interest to you. If at any time you do not wish to receive such marketing information, you have the option to ask us not to send you any further such material – you may do so by emailing, phoning or writing to us.

COMPLAINTS

If you believe that the privacy of your personal information is not being adequately protected, you should contact our Privacy Officer. We will make every effort to resolve your complaint internally. If we do not resolve your complaint to your satisfaction, you may apply to the Australian Information Commissioner to have your complaint investigated. For more information about how you may lodge a complaint with the Australian Information Commissioner, please contact 1300 363 992.

CHANGES TO THIS PRIVACY POLICY

Please note that this Privacy Policy may change from time to time. You may at any time request a current copy from our Privacy Officer or access it from our website at www.fairwaycap.com.au. We encourage you to review our Privacy Policy periodically for any changes.

ADDITIONAL INFORMATION

Additional information, including the Australian Privacy Principles, may be found on the Australian Information Commissioner's website at www.oaic.gov.au or Privacy Commissioner's website at www.privacy.gov.au.

CONTACT DETAILS

If you would like further information or have questions regarding this policy, or if you would like to inquire about your personal information known to us, or provide changes to your current information, contact us by:

Telephone: (07) 5520 8788,

E-mail: partner@fairwaycap.com.au

By Mail:

The Privacy Officer,

Fairway Capital Management Pty Ltd,

11 West Street BURLEIGH HEADS QLD 4220