

Privacy Policy

Effective date: 30 January 2024

Reviewed: Every two years

Owner: Compliance Manager

Approval: Compliance Manager

Policy

Rural Funds Management (RFM) is committed to protecting personal information it receives during the course of its business. RFM recognises and respects each client's right to privacy and confidentiality.

RFM is bound by the *Privacy Act 1988* (Cth) (Privacy Act), Australian Privacy Principles and registered privacy codes that govern the way in which RFM must manage personal information.

Purpose

This policy describes the personal information RFM collects and how it is stored, used and disclosed.

Scope

This policy applies to RFM and all entities which are owned and/or managed by RFM and their employees.

Investors' queries regarding the privacy policy will be forwarded to the Compliance Manager as the initial point of contact.

Related Policies

- Data Breach Response Policy
- Risk Management Policy
- Cybersecurity Management Plan

Need help?

Any queries regarding this policy should be directed to the Compliance team.

Privacy information regarding Investors

Collection of personal information

1. Any information RFM collects that identifies the Investor is deemed to be 'Personal Information'. RFM does not collect, nor ever intends to collect 'Sensitive Information'.¹ Collection of Personal Information is necessary for RFM to perform its functions and activities.
2. RFM collects information from Investors through its standard forms (such as an application form or new investor details form). This may include an Investor's address, telephone numbers, email, date of birth and TFN/ABN.
3. Where it is practicable and reasonable, RFM collects Investor information directly. There may be occasions where information is collected through a financial adviser.
4. The information Investors provide will only be used for the purpose for which it was collected, unless:
 - otherwise permitted by law
 - or
 - where they have consented to the information being used for a secondary purpose
 - or
 - as part of the normal operations of the company.
5. RFM endeavours to keep and maintain the data held as accurate and up to date as possible. RFM encourages Investors to promptly advise RFM if their contact details change. RFM will update the contact details as soon as reasonably practicable.

Collection of TFN/ABN

6. Collection of TFNs and ABNs is authorised by taxation law.²
7. An application form attached to any PDS issued by RFM will include a field to provide an applicant's TFN/ABN.
8. Investors are not obliged to supply their TFN/ABN. However, they must be notified that choosing not to provide their TFN/ABN will have negative tax consequences and explain what these consequences are.
9. TFN information will be only used or disclosed for purposes authorised by taxation law, personal assistance law or superannuation law.
10. Access to records containing TFN information is restricted to RFM staff, Boardroom (investor registry) staff and the Australian Taxation Office (who need to handle this information for taxation law purposes). Where the TFN is no longer required by law to be retained or is no longer necessary for a purpose under taxation law, RFM will take reasonable steps to securely destroy or permanently de-identify the TFN information.

¹ See Definitions page.

² Further guidelines can be found on the ATO website, or by reference to the Privacy (Tax File Number) Rule 2015.

Use of personal information

11. RFM may use personal information to:

- assess an Investor's application
- administer and manage an Investor's assets
- facilitate RFM's internal business operations, including fulfilment of any legal requirements
- analyse products and customer needs in order to develop new products
- communicate with Investors
- provide investors with promotional information
- carry out confidential maintenance and testing of computer systems.

Disclosure of personal information

12. RFM may disclose Investors' personal information (as necessary):

- on a confidential basis to industry bodies, RFM's agents, contractors or third party service providers that provide financial, administrative or other services for the purposes of RFM's business or investments
- where the law requires RFM to do so
- with Investors' consent.

13. From time to time, RFM and financial advisers may provide Investors with marketing material prepared by RFM. Investors will be given the opportunity to indicate if they do not wish to receive such materials.

14. RFM does not currently disclose personal information overseas.

Storage and security

15. RFM maintains strict standards and security procedures to prevent unauthorised access to personal information. Data is stored in a central database that is password protected with access available only to authorised persons. Paper documents are securely stored and can only be accessed by authorised persons.

16. Where personal information is no longer needed for any purpose, RFM will take all necessary steps to destroy or permanently de-identify the information it holds.

Investor access to personal information

17. Investors are entitled at any time to request access to their personal information held by RFM and request this information be corrected, if required.

18. RFM has the right to deny such requests as permitted or otherwise prescribed by law. RFM may also refuse to provide access to personal information held about Investors in any case where the Australian Privacy Principles allow RFM to do so. Where access has been denied, RFM will provide written reasons for this (unless it is unreasonable to do so).

19. RFM may charge a reasonable fee for providing Investors with copies of any information they have requested, if complying with the request requires considerable time or expense

on RFM's part. Access can be requested by contacting RFM Investor Services³ (fees are not applicable when making this request).

Anonymity and pseudonymity

20. Wherever it is lawful and practicable, individuals, when interacting with RFM, will have the option of not identifying themselves or of using a pseudonym.⁴
21. An Investor is unable to remain anonymous or use an pseudonym when RFM is required under Australian law to identify an individual or company.⁵

Privacy information regarding Employees and Third Parties

22. The Privacy Act contains exemptions from privacy obligations in relation to employee records, that is, records directly related to existing or former employment relationships.
23. Nonetheless, RFM is committed to ensuring the confidentiality and security of the information provided to the Company. To comply with legal requirements and to run our business effectively it is necessary for RFM to collect certain personal information about the people whom RFM employs or with whom RFM deals. At a minimum this usually includes information such as people's names, addresses and contact details. Additional information such as a tax file number may be required depending on the nature of the persons' dealings with the Company.
24. An employee can request details of any personal information the Company holds about them and advise RFM if it is inaccurate, incomplete or out of date.
25. The information provided will only be used for the purpose for which it was intended, unless the person has consented to the information being used for a secondary purpose, or as part of the normal operations of the company with which the person is dealing. What is considered part of normal operations may vary depending upon the business operation within the Company.
26. RFM takes all reasonable security measures to protect personal information from loss, unauthorised access, destruction, misuse, modification or disclosure. As far as permissible under law, RFM accepts no responsibility for the unauthorised use of personal information held by it.
27. RFM respects that these disclosures may contain sensitive personal information and that it is obliged to abide by the conditions of the Privacy legislation in how it stores and uses this information. As such, this information will be stored only on personal employee files in Employment Hero and will not be made available to persons other than People and Safety and Compliance personnel without the employee's prior notification and only for the express purposes of conducting directly related RFM business.

³ Via the website: <https://ruralfunds.com.au/contact-us/>

⁴ Australian Privacy Principles guidelines – Chapter 2.9 – 2.11

⁵ Australian Privacy Principles guidelines – Chapter 2.15 – 2.22

Definitions

ABN	Australian Business Number
Australian Privacy Principles	has the meaning given by the <i>Privacy Act 1998</i> (Cth)
Company or RFM	means Rural Funds Management Limited ACN 077 492 838, and includes its subsidiary companies and any entity for which it is responsible entity
Compliance team	The Compliance team includes: <ul style="list-style-type: none"> • Company Secretary • Compliance Manager • Compliance Officer
Investor	an individual, trust or company/partnership that invest in a registered scheme
Organisation	means: <p>(a) an individual; or</p> <p>(b) a body corporate; or</p> <p>(c) a partnership; or</p> <p>(d) any other unincorporated association; or</p> <p>(e) a trust;</p> <p>that is not a small business operator, a registered political party, an agency, a State or Territory authority or a prescribed instrumentality of a State or Territory</p> <p>A legal person can have a number of different capacities in which the person does things. In each of those capacities, the person is taken to be a different organisation</p> <p><i>Example: In addition to his or her personal capacity, an individual may be the trustee of one or more trusts. In his or her personal capacity, he or she is one organisation. As trustee of each trust, he or she is a different organisation</i></p>
PDS	Product Disclosure Statement
Personal information	means a broad range of information, or an opinion, that could identify an individual. Personal information identification may vary from person to person
Privacy Act	means <i>Privacy Act 1998</i> (Cth)
Sensitive information	means personal information that includes information or an opinion about an individual's: <ul style="list-style-type: none"> • racial or ethnic origin • political opinions or associations • religious or philosophical beliefs • trade union membership or associations • sexual orientation or practices • criminal record • health or genetic information • some aspects of biometric information. <p>Generally, sensitive information has a higher level of privacy protection than other personal information.</p>
TFN or Tax File Number	Tax File Number is a unique number created by the Australian Taxation Office. TFN information is information that connects the TFN holder with their identity