



BOMBORA

# PRIVACY POLICY

Bombora Investment Management

ACN: 625 413 390

Authorised representative for Ironbridge Capital  
Management Pty Ltd ACN: 105 880 108 (AFSL 237 556)

v.1.0

June 2020

## Privacy Policy

The privacy of your personal information is important to us and we understand that how we collect, use and protect your personal information is important to you.

This Privacy Policy applies to Bombora Investment Management Pty Ltd (ACN 625 413 390) ("**BIM**"). It is subject to the Australian Privacy Principles contained in Schedule 1 of the *Privacy Act 1988* (Cth) (**Act**), which regulates the manner in which personal information is handled by private sector organisations.

### What is this policy about?

This policy has been created to provide a clear understanding of how BIM collects, uses, stores, discloses and protects personal information in all of its activities and capacities.

Under the Act, 'personal information' is defined as any "information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not".

### Bombora Investment Management's commitment to privacy

BIM aims to take all reasonable steps to protect the privacy of the personal information it collects. Maintaining the privacy of our clients is very important to us and we recognise clients will want to know how we deal with the personal information we collect about them. This policy sets out our approach to protecting the privacy of all our clients and contacts in accordance with the law.

We are happy to answer questions at any time. The contact details for our Chief Risk and Compliance Officer are listed at the end of this document.

### What type of personal information do we collect and hold?

We will only collect information that we believe to be relevant and required to provide our service to our clients (where appropriate) and to the conduct of our business.

Due to the nature of the business and services we provide, we are unable to offer our services to clients on an anonymous basis or under a pseudonym.

### How do we collect personal information?

In the general conduct of our business we may be required to collect, hold and use personal information. Generally, we may collect personal information in one of more of the following ways:

- from you directly in person;
- through telephone conversations;
- written correspondence;
- through our website when you log in; and/or
- through an authorised third party.

The list above is non-exhaustive, where required we may also obtain personal information from third parties including public registers, regulatory authorities and/ or credit reporting providers.

## Why do we need personal information?

We need a certain amount of personal information regarding our business or corporate contacts in order to conduct our business effectively and efficiently. We will use client information to provide better customer services and products.

## Do we give personal information to any other person or organisation?

BIM does not provide personal information to any other person or organisation locally or internationally. All BIM staff with permitted access to client information are specifically required to observe our confidentiality obligations.

We may be required, from time to time, to disclose client information to Governmental, judicial bodies, agencies or our regulators, but we will only do so under proper authority. We will not disclose client information to any external organisation unless we have client consent, are required by law or have previously informed the client.

## Security of personal information

We undertake reasonable steps to protect personal information from misuse, loss, unauthorised access, modification or disclosure. If we hold personal information that is no longer needed, we will take reasonable steps to effectively and securely destroy it.

We have various policies and procedures that are designed to ensure that the personal information we collect remains confidential and secure, both in paper and electronic environments. We maintain strict security systems designed to prevent unauthorised access to client information by anyone, including unauthorised staff.

However, whilst we are committed to protecting the personal information and privacy of users on our websites, we cannot guarantee the security of any information disclosed online. If at any time you are concerned about sending information over the internet, you may contact us by telephone or post. We further note that any links to third party websites that are not operated or controlled by us have been inserted for your convenience only. In general, use of such websites or any other third party websites are not covered by this policy and we recommend you review their relevant privacy policy before supplying any personal information.

## Internet Site Privacy

BIM internet site may use technology to monitor traffic through the site. This is done without collecting personal information.

When you access our website we may record your server address, and when you accessed our website. We are also able to access general information regarding the pages and documents you reviewed and/ or downloaded.

## Accessing your personal information

Privacy laws give a right of access to the personal information we hold, subject to exceptions allowed by law. BIM will provide access to personal information to the individual who is the subject of the information. Clients and contacts can ask to inspect and copy this information, and ask us to update or correct it by contacting the Chief Risk and Compliance Officer.

## Responding to data breaches

BIM will endeavour to take appropriate, prompt action if we have reasonable grounds to believe that a data breach may have or is suspected to have occurred. Depending on the type of data breach, this may include a review of our internal security procedures, taking remedial internal action and notifying affected individuals.

## Complaints

Any complaints about the information we have collected and/ or how we have handled, used or disclosed such information should be directed to our Chief Risk and Compliance Officer who will contact you within 5 business days after receiving your complaint to discuss the complaint and work with you towards a resolution:

### Chief Risk and Compliance Officer Contact Details

Level 16, 56 Pitt Street  
Sydney, NSW 2000

E: [reception@bomboragroup.com.au](mailto:reception@bomboragroup.com.au)

If a resolution is not achieved at first instance, we will take steps to conduct a thorough investigation of the matter. Investigation of complaints may take up to 21 days (longer for complex matters), which may require you to provide us with detailed information and supporting documentation in relation to the matter. Once we have finalised our investigation we will organise to meet with you to discuss findings and proposed resolution.

If we cannot reach a satisfactory resolution within 45 days, you may raise your concerns with the Office of the Australian Information Commissioner (**OAIC**):

### OAIC Contact Details

GPO BOX 5218

Sydney NSW 2001

Phone: 1300 363 992

Website: [www.oaic.gov.au](http://www.oaic.gov.au)

## Policy Updates

BIM may update this Policy from time to time to ensure that it reflects current regulatory and statutory obligations. A current and updated version of this policy will be posted on our website and a copy may be obtained by request from our Chief Risk and Compliance Officer.