

PRIVACY POLICY

Arrow Funds Management Limited has adopted a privacy policy which is based on the requirements of the Privacy Act and the Australian Privacy Principles developed under that Act.

Arrow does not and will not retain privacy information on its website.

Arrow's unit registry functions are outsourced to Boardroom (Vic) Pty Ltd which has its own privacy policy. Further information on this can be found at: www.boardroomlimited.com.au

Information you provide to Arrow

Other than through the website, Arrow only collects personal information as necessary to provide a service to its investors. Arrow will use personal information to:

- process applications for financial products;
- administer and manage investments;
- update investors during the life of their investment as may be required from time to time; and
- facilitate Arrow's legal and compliance operations.

This information is only made available to those Arrow staff members or appointed agents who require the information in order to manage and service Arrow's financial products.

Personal information collected through your return of application forms for subscription for an Arrow financial product may also be used by Arrow to develop an understanding of the products investors may be interested in obtaining from Arrow.

Arrow may disclose personal information (as necessary):

- on a confidential basis to our agents, contractors or other third party service providers which provide administrative or other services for the purposes of Arrow's business or investments;
- to rating agencies and financiers or such other organisations in connection with our corporate activities;
- where the law requires us to do so;
- if investors consent to provision of the information to a third party (eg. their financial advisor or accountant).

Overseas disclosure

Arrow does not disclose personal information to overseas recipients.

Direct marketing

Arrow may use and disclose your personal information in order to inform you of products and services that may be of interest to you. In the event you do not wish to receive such communications, you can opt-out by contacting Arrow's Privacy Officer on 03 9691 5447.

Security of your personal information

Arrow regards the security of personal information as very important and takes steps reasonable in the circumstances to ensure the personal information it holds is protected from misuse, interference and loss and from unauthorised access, modification or disclosure. Arrow holds personal information in both hard copy and electronic forms in secure databases on secure premises, accessible only by authorised personnel. Arrow has a number of physical and electronic protection measures in place including:

- confidentiality statements on all outgoing correspondence including email;
- document storage security policies;

- security measures for systems of access including encryption, firewalls, site monitoring and intrusion detection;
- providing a discreet environment for confidential discussions; and only allowing access to personal information where the individual seeking access has satisfied Arrow's identification requirements.

However, Arrow cannot guarantee the security of personal information provided to it by way of email nor can it guarantee the safe delivery of personal information via ordinary post. The security arrangements are reviewed and tested from time to time.

Arrow will destroy or de-identify personal information in circumstances where it is no longer required, unless Arrow is otherwise required or authorised by law to retain the information.

Investors may access their personal information held by Arrow

Arrow takes steps reasonable in the circumstances to ensure personal information it holds is accurate, up-to-date, complete, relevant and not misleading. Under the Privacy Act, you have a right to access and seek correction of your personal information that Arrow collects and holds. If at any time you would like to access or correct the personal information Arrow holds about you, or you would like more information on the Arrow's approach to privacy, please contact Arrow's Privacy Officer on the details set out below. Arrow will grant access to the extent required or authorised by the Privacy Act or other law and take steps reasonable in the circumstances to correct personal information where necessary and appropriate. To obtain access to your personal information:

- you will have to provide proof of identity. This is necessary to ensure that personal information is provided only to the correct individuals and that the privacy of others is protected;
- Arrow requests that you be reasonably specific about the information you require;
- Arrow may charge you a reasonable administrative fee, which reflects the cost to Arrow, for providing access in accordance with your request.
- If Arrow refuses your request to access or correct your personal information, Arrow will provide you with written reasons for the refusal and details of complaint mechanisms. Arrow will also take steps reasonable in the circumstances to provide you with access in a manner that meets your needs and the needs of Arrow.

Arrow will endeavour to respond to your request to access or correct your personal information within 30 days from your request.

Complaint handling processes

Privacy complaints are handled in a complimentary manner to Arrow's other complaints handling processes. Please direct all privacy complaints to Arrow's Privacy Officer on the details set out above. At all times, privacy complaints:

- will be treated seriously;
- will be dealt with promptly;
- will be dealt with in a confidential manner; and
- will not affect your existing obligations or affect the commercial arrangements between you and Arrow.

Arrow's Privacy Officer will commence an investigation into your complaint. You will be informed of the outcome of your complaint following completion of the investigation. In the event that you are dissatisfied with the outcome of your complaint, you may refer the complaint to the Federal Office of the Australian Information Commissioner.

If you have any questions in relation to privacy or our management of personal information, email Arrow on enquiries@arrowfunds.com.au or call (03) 9691 5447.