

Revision: v2.0 Prepared by: AG  
Effective Date: 22/12/2025 Approved by: Board

## Title: GA108 PRIVACY POLICY

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### Policy

The Company has an obligation to protect the privacy of personal information it holds. When dealing with personal information, the Company will adhere to the *Privacy Act 1998 (Cth)* at all times.

### Purpose

To provide a means for the control of collection, use, disclosure and storage of personal information.

### Scope

All requests by an outsider to an employee regarding financial, income, marketing, investors, personnel, vendors, or other company confidential information.

### Entity

MPG Funds Management Limited and all related entities (“MPG”).

### Responsibilities

**Compliance Officer** (“CO”) is responsible for ensuring this Policy is current and that best endeavours are taken by MPG to protect the privacy of individuals.

### Definitions

Personal Information - 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.

Sensitive Information - A subset of Personal Information, including information about an individual’s health, racial or ethnic origin, political opinions, religious beliefs, sexual orientation, criminal record, or membership of a professional or trade association.

APP Entity - An Agency (e.g., government) or an Organisation that is bound by the Australian Privacy Principles. **MPG is an APP Entity.**

## 1. Introduction of Policy

- 1.1. As part of MPG’s process to ensure that it continues to maintain the highest levels of professional integrity and ethical conduct, MPG has adopted this Privacy Policy (“Policy”) to manage personal information in an open and transparent manner.
- 1.1 The provisions of this Policy will assist MPG in complying with the requirements of the *Privacy Act 1988 (Cth)* (“Privacy Act”) and the Australian Privacy Principles in protecting the personal information MPG holds about its clients.

1.2 This Policy applies to all representatives and employees of MPG at all times and the requirements remain in force on an ongoing basis.

## 2. Consideration of Personal Information Privacy

### 2.1. Privacy Statement

MPG's CO must ensure that at all times the provisions of this policy are implemented in the day-to-day running of MPG.

CO must ensure that at all times this Policy:

- (a) is current and reflects the latest applicable Australian laws; and
- (b) contains the following information:
  - (i) the kinds of personal information that MPG collects and holds;
  - (ii) how MPG collects and holds personal information;
  - (iii) the purposes for which MPG collects, holds, uses and discloses personal information;
  - (iv) how an individual may complain about a breach of the Australian Privacy Principles, or other relevant legislation that binds MPG, and how MPG will deal with such a complaint;
  - (v) whether MPG is likely to disclose personal information to overseas recipients;
  - (vi) if MPG is likely to disclose personal information to overseas recipients, the countries in which such recipients are likely to be located if it is practicable to specify those countries in this policy.

MPG must ensure that MPG's Privacy Statement is available free of charge and in such form as appropriate. MPG will make the Privacy Statement available on its website.

If the Privacy Statement is requested in a particular form, MPG will take such steps as are reasonable to provide the Privacy Statement in the form requested.

### 2.2. Anonymity and Pseudonymity

You have the option of dealing with MPG anonymously or by using a pseudonym where it is lawful and practicable to do so.

In most cases, due to the nature of financial services and investment, we will require you to provide your personal information to assist you in investing in a fund, to manage your account, or comply with our legal obligations (e.g., under Anti-Money Laundering laws).

## 3. Collection of Personal Information (Solicited personal information)

### 3.1. Personal Information (other than sensitive information)

This section applies to the collection of personal information that is solicited by MPG.

MPG must not collect personal information (other than sensitive information) unless the information is reasonably necessary for one or more of MPG's functions or activities.

MPG's functions or activities include:

- (a) Assisting you to invest in a fund.
- (b) Recording or accessing information at the Titles Registry Office or other governmental agency.
- (c) Client and business relationship management.

### 3.2. Sensitive Information

MPG must not collect sensitive information about an individual unless:

- (a) the individual consents to the collection of the information and the information is reasonably necessary for one or more of MPG's functions or activities (as described in section 3.1); or
- (b) the collection of the information is required or authorised by or under an Australian law or a Court/Tribunal order; or
- (c) a permitted general situation exists in relation to the collection of the information by MPG; or
- (d) a permitted health situation exists in relation to the collection of the information by MPG.

### 3.3. Means of Collection

MPG must only collect personal information by lawful and fair means.

MPG must only collect personal information about an individual from the individual (rather than someone else), unless it is unreasonable or impracticable to do so or the individual has instructed MPG to liaise with someone else.

MPG will collect personal information from an individual when:

- (a) You fill out a form.
- (b) You give us personal information in person, via telephone, email, or correspondence.
- (c) You provide information via our website.
- (d) We collect information from a third party or a publicly available source, such as a credit reporting agency, your legal adviser or accountant.

### 3.4. Information Collected by MPG

The information MPG collects may include the following:

- (a) Name (Implied/Required for other data)
- (b) Date of birth
- (c) Residential address
- (d) Postal address
- (e) Email address
- (f) Home telephone number
- (g) Work telephone number

- (h) Mobile telephone number
- (i) Your occupation and business address
- (j) Financial information including details of your employer, income, name of bank or financial institution
- (k) Details of properties owned by you
- (l) Income
- (m) Company turnover
- (n) Company profit and loss statements
- (o) Other information as deemed necessary

### 3.5. Purpose of Collection

If an individual is acquiring or has acquired a product or service from MPG, the individual's personal information will be collected and held for the purposes of:

- (a) checking whether an individual is eligible for MPG's product or service;
- (b) providing the individual with MPG's product or service;
- (c) managing and administering MPG's product or service;
- (d) protecting against fraud, crime or other activity which may cause harm in relation to MPG's products or services;
- (e) complying with legislative and regulatory requirements in any jurisdiction;
- (f) to assist MPG in the running of its business;
- (g) assisting you to invest in a fund;
- (h) recording or accessing information at the Titles Registry Office or other governmental agency;
- (i) client and business relationship management;
- (j) marketing of products and services;
- (k) complying with legislative and regulatory requirements (e.g., identity verification).

MPG may also collect personal information for the purposes of letting an individual know about products or services that might better serve their needs or other opportunities in which they may be interested. Please refer to Section 8 for further information.

## 4. Collection of Personal Information (Unsolicited personal information)

### 4.1. Dealing With Unsolicited Personal Information

If MPG:

- (a) receives personal information about an individual; and
- (b) the information is not solicited by MPG, then

MPG must, within a reasonable period after receiving the information, determine whether or not it was permitted to collect the information under Section 3 above.

MPG may use or disclose the personal information for the purposes of making the determination under paragraph 4.1.

If MPG:

- (a) determines that it could not have collected the personal information; and
- (b) the information is not contained in a Commonwealth record, then

MPG must as soon as practicable, destroy the information or ensure that the information is de-identified, only if it is lawful and reasonable to do so.

## **5. Automated Decision Making (“ADM”)**

- 5.1. MPG does not use automated decision-making systems (including artificial intelligence tools) to make decisions that have a legal or similarly significant effect on an individual’s rights or interests (such as eligibility for a product, loan, or investment) without human oversight.
- 5.2. If MPG begins to use ADM for such high-impact decisions, this Policy will be updated to detail the personal information involved in the decision and how the decision is made.

## **6. Notification of the Collection of Personal Information**

6.1. Notification of Collection of:

- (a) solicited information; and
- (b) unsolicited information to which section 4 does not apply.

MPG must notify the individual of the following matters in the Privacy Statement:

- (a) MPG’s identity and contact details;
- (b) if MPG collects the personal information from a third party or the individual is not aware that MPG has collected the personal information, the fact that MPG so collects, or has collected the information and the circumstances of that collection;
- (c) if the collection of the personal information is required or authorised by or under an Australian law or a Court/Tribunal order, the fact that the collection is so required or authorised (including the details of the law or court);
- (d) the purposes for which MPG collects the personal information;
- (e) the main consequences (if any) for the individual if the information is not collected by MPG;
- (f) any other entities to which MPG usually discloses personal information of the kind collected by MPG;
- (g) that MPG’s Privacy Statement and this Privacy Policy contains information about how the individual may access the personal information about the individual that is held by MPG and seek correction of such information;
- (h) that MPG’s Privacy Statement contains information about how the individual may complain about a breach of the Australian Privacy Principles and how MPG will deal with such a complaint;
- (i) whether MPG will disclose the personal information to overseas recipients; and

- (j) if MPG discloses the personal information to overseas recipients – the countries in which such recipients will be located if it is practicable to specify those countries in the notification or to otherwise make the individual aware of them.

If you choose not to provide the requested information, MPG may be unable to provide services to you, including assessing your eligibility, providing the product, or assisting you to invest in a fund.

## 7. Use or Disclosure of Personal Information

### 7.1. Use or Disclosure

Where MPG holds personal information about an individual that was collected for a particular purpose (“the primary purpose”), MPG must not use or disclose the information for another purpose (“the secondary purpose”) unless:

- (a) the individual has consented to the use or disclosure of the information; or
- (b) the individual would reasonably expect MPG to use or disclose the information for the secondary purpose, and the secondary purpose is:
  - (i) directly related to the primary purpose (if the information is sensitive information); or
  - (ii) related to the primary purpose (if the information is *not* sensitive information);
- (c) the use or disclosure of the information is required or authorised by or under an Australian law or a Court/Tribunal order; or
- (d) a permitted general situation exists in relation to the use or disclosure of the information by MPG; or
- (e) MPG reasonably believes that the use or disclosure of the information is reasonably necessary for one or more enforcement related activity conducted by, or on behalf of, an enforcement body.

Where MPG uses or discloses personal information in accordance with section 7.1(e), MPG will keep a copy of this disclosure (e.g.: the email or letter used to do so).

This section 7 does not apply to:

- (a) personal information for the purposes of direct marketing; or
- (b) government related identifiers.

If MPG collects personal information from a related body corporate, this section 7 applies as if MPG’s primary purpose for the collection was the primary purpose for which the related body corporate collected the information.

## 7.2. Who Does MPG Disclose Personal Information To?

MPG may disclose personal information collected from clients and prospective clients to the following:

- (a) Our legal advisor(s) and the legal advisor(s) representing the other party(s) involved in your transaction.
- (b) Your financial institution and/or financial advisor.
- (c) Insurance providers and brokers.
- (d) Utility providers and utility connection service providers.
- (e) Organisations involved in maintaining, reviewing and developing our business and computer systems.
- (f) Organisations involved in the payments systems including financial institutions, Merchants and payment organisations.
- (g) The Titles Registry Office or other government agency.
- (h) Related companies.
- (i) Third party suppliers or contractors to provide specialised services such as web hosting, cloud computing technology and data storage services.
- (j) Enforcement bodies (e.g. police, ASIC, Austrac, ATO) where reasonably necessary for enforcement related activities.

## 8. Direct Marketing

### 8.1. Direct Marketing

MPG must not use or disclose the personal information it holds about an individual for the purpose of direct marketing.

### 8.2. Exception - Personal Information Other Than Sensitive Information

MPG may use or disclose personal information (other than sensitive information) about an individual for the purposes of direct marketing if:

- (a) MPG collected the information from the individual; and the individual would reasonably expect MPG to use or disclose the information for that purpose; or
- (b) MPG has collected the information from a third party; and either:
  - (i) MPG has obtained the individual's consent to the use or disclosure of the information for the purpose of direct marketing; or
  - (ii) it is impracticable for MPG to obtain the individual's consent; and
  - (iii) MPG provides a simple way for the individual to opt out of receiving direct marketing communications from MPG;
- (c) each direct marketing communication with the individual MPG:
  - (i) includes a prominent statement that the individual may make such a request;  
or

- (ii) directs the individual's attention to the fact that the individual may make such a request; and
- (iii) the individual has not made a request to opt out of receiving direct marketing.

### 8.3. Exception – Sensitive Information

MPG may use or disclose sensitive information about an individual for the purpose of direct marketing if the individual has consented to the use or disclosure of the information for that purpose.

### 8.4. Requests to Stop Direct Marketing

Where MPG uses or discloses personal information about an individual for the purposes of direct marketing by MPG or facilitating direct marketing by another organisation, the individual may request:

- (a) that MPG no longer provide them with direct marketing communications;
- (b) that MPG does not use or disclose the individual's personal information for the purpose of facilitating direct marketing by another organisation;
- (c) that MPG provides the source of the personal information.

Where MPG receives a request from an individual under section 17.1, MPG will:

- (a) give effect to the request under Section 17.1(a) or 17.1(b) within a reasonable period after the request is made and free of charge; and
- (b) notify the individual of the source of the information, if the individual requests it, unless it is impracticable or unreasonable to do so.

This Section 8 does not apply to the extent that the following laws apply:

- (a) the *Do Not Call Register Act 2006 (Cth)*;
- (b) the *Spam Act 2003 (Cth)*; or
- (c) any other Act of the Commonwealth of Australia.

## 9. Cross Border Disclosure of Personal Information

### 9.1. Disclosing Personal Information to Cross Border Recipients

Where MPG discloses personal information about an individual to a recipient who is not in Australia and who is not MPG or the individual, MPG must ensure that the overseas recipient does not breach the Australian Privacy Principles (with the exception of APP1).

MPG relies on third-party service providers for specialised functions, such as web hosting, cloud computing technology, and data storage services. Due to the global nature of these services, these processes will likely involve the disclosure of your personal information to overseas recipients.

Where practicable, MPG request third-party service providers to advise MPG data is stored outside of Australia. MPG are not aware of any MPG data being stored outside of Australia.

The location of overseas recipients is not always practicable to specify as our third-party suppliers often use global cloud platforms that may change their physical data location.

Section 9.1 does not apply where:

- (a) MPG reasonably believes that:
  - (i) information is subject to a law or binding scheme that has the effect of protecting the information in a way that is at least substantially similar to the way in which the Australian Privacy Principles protect the information; and
  - (ii) there are mechanisms that the individual can access to take action to enforce that protection of the law or binding scheme; or
- (b) both of the following apply:
  - (i) MPG has informed the individual that if they consent to the disclosure of information MPG will take reasonable steps to ensure the overseas recipient does not breach the Australian Privacy Principles; and
  - (ii) after being so informed, the individual consents to disclosure;
- (c) the disclosure of the information is required or authorised by or under an Australian law or a Court/Tribunal order; or
- (d) a permitted general situation (other than the situation referred to in item 4 or 5 of the table in subsection 16A (1) Privacy Act exists in relation to the disclosure of the information by MPG.

## 10. Adoption, Use or Disclosure of Government Identifiers

### 10.1. Adoption of Government Related Identifiers

MPG must not adopt a government related identifier of an individual as its own identifier unless:

- (a) MPG is required or authorised by or under an Australian law or a Court/Tribunal order to do so; or
- (b) the identifier, MPG and the circumstances of the adoption are prescribed by regulations.

### 10.2. Use or Disclosure of Government Related Identifiers

Before using or disclosing a government related identifier of an individual, MPG must ensure that such use or disclosure is:

- (a) reasonably necessary for MPG to verify the identity of the individual for the purposes of the organisation's activities or functions; or
- (b) reasonably necessary for the organisation to fulfil its obligations to an agency or a State or Territory authority; or
- (c) required or authorised by or under an Australian law or a Court/Tribunal order; or
- (d) within a permitted general situation (other than the situation referred to in item 4 or 5 of the table in subsection 16A (1) Privacy Act; or
- (e) reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
- (f) the identifier, MPG and the circumstances of the adoption are prescribed by regulations.

## 11. Integrity of Personal Information

### 11.1. Quality of Personal Information

MPG will ensure that the personal information it collects and the personal information it uses or discloses is, having regard to the purpose of the use or disclosure, accurate, up to date, complete and relevant.

### 11.2. Security of Personal Information

MPG will ensure that it protects any personal information it holds from misuse, interference, loss, unauthorised access, modification and disclosure.

MPG will take reasonable steps to destroy or de-identify any personal information it holds where:

- (a) MPG no longer needs the personal information for any purpose for which the information may be used or disclosed by MPG;
- (b) the information is not contained in a Commonwealth record;
- (c) MPG is not required to retain that information under an Australian law, or a Court/Tribunal order.

MPG confirms that these reasonable steps include the implementation of technical and organisational measures to ensure the security of personal information.

### 11.3. Storage of Personal Information

MPG is committed to keeping your personal information secure and safe.

MPG stores personal information in different ways, including:

- (a) hard copy documents
- (b) electronically.

In order to ensure MPG protects any personal information it holds from misuse, interference, loss, unauthorised access, modification and disclosure, MPG implements the following procedure/system:

- (a) employee and contractor agreements set out confidentiality requirements.
- (b) access to information systems is controlled through identity and access management;
- (c) all employees are required to complete training about information security;
- (d) secure hard copy document storage (i.e., storing hard copy documents in locked filing cabinets);
- (e) providing a discreet environment for confidential discussions;
- (f) access control for our buildings;
- (g) reviewing personal information held and destroying or de-identifying information no longer needed;
- (h) MPG regularly monitors and reviews its compliance with internal policies and industry best practice.

## 12. Access to, and correction of, personal information

### 12.1. Access

MPG must give an individual access to the personal information it holds about the individual if so requested by the individual.

MPG must respond to any request for access to personal information within a reasonable period after the request is made.

MPG must give access to the information in the manner requested by the individual, if it is reasonable and practicable to do so and must take such steps as are reasonable in the circumstances to give access in a way that meets the needs of MPG and the individual.

MPG must not charge an individual for making a request and must not impose excessive charges for the individual to access their personal information.

### 12.2. Exceptions

MPG is not required to give an individual access to their personal information if:

- (a) MPG reasonably believes that giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety; or
- (b) giving access would have an unreasonable impact on the privacy of other individuals; or
- (c) the request for access is frivolous or vexatious; or
- (d) the information relates to existing or anticipated legal proceedings between MPG and the individual, and would not be accessible by the process of discovery in those proceedings; or
- (e) giving access would reveal intentions of MPG in relation to negotiations with the individual in such a way as to prejudice those negotiations; or
- (f) giving access would be unlawful; or
- (g) denying access is required or authorised by or under an Australian law or a Court/Tribunal order; or
- (h) MPG has reason to believe that unlawful activity, or misconduct of a serious nature, that relates to our functions or activities has been, or may be engaged in and giving access would be likely to prejudice the taking of appropriate action in relation to the matter; or
- (i) giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
- (j) giving access would reveal evaluative information generated within MPG in connection with a commercially sensitive decision-making process.

### 12.3. Refusal to Give Access

If MPG refuses to give access in accordance with section 12.2 or to give access in the manner requested by the individual, MPG will give the individual a written notice that sets out:

- (a) the reasons for the refusal except to the extent that, having regard to the grounds for the refusal, it would be unreasonable to do so; and
- (b) the mechanisms available to complain about the refusal; and
- (c) any other matter prescribed by the regulations.

Where MPG refuses to give access under section 12.2(j) MPG may include an explanation of the commercially sensitive decision in its written notice of the reasons for denial.

## 13. Correction of personal information

### 13.1. Correction of Information

MPG must take reasonable steps to correct all personal information, having regard to the purpose for which the information is held where:

- (a) MPG is satisfied the information is inaccurate, out of date, incomplete, irrelevant or misleading; or
- (b) the individual requests MPG corrects the information.

Where MPG corrects personal information about an individual that MPG previously disclosed to another APP entity and the individual requests MPG to notify the other APP entity of the correction, MPG must take reasonable steps to give that notification, unless it is impracticable or unlawful to do so.

### 13.2. Refusal to Correct Information

If MPG refuses to correct personal information as requested by the individual, MPG will give the individual a written notice that sets out:

- (a) the reasons for the refusal except to the extent that it would be unreasonable to do so; and
- (b) the mechanisms available to complain about the refusal; and
- (c) any other matter prescribed by the regulations.

### 13.3. Request from a Client to Associate a Statement with their Information

If:

- (a) MPG refuses to correct personal information as requested by the individual; and
- (b) the individual requests that MPG associate a statement noting that the information is inaccurate, out of date, incomplete, irrelevant or misleading, with the individual's information,

MPG must take such steps as are reasonable in the circumstances to associate the statement (as described in section 14.1(b)) with the individual's personal information. The statement

should be associated with the information in such a way that will make the statement apparent to users of the information.

## 14. Dealing with Requests

### 14.1. MPG must:

- (a) respond to requests under this Section 14 within a reasonable period after the request is made; and
- (b) must not charge the individual for the making of the request, for correcting the personal information or for associating the statement with the personal information.

## 15. Making A Privacy Complaint

15.1. MPG offers a free internal complaint resolution scheme to all customers. Should a client have a privacy complaint, they are to contact MPG to discuss their concerns using the following contact details:

**Mail:** complaints@mpgfm.com.au  
**Phone:** 1300 668 247  
**Post:** PO Box 1307, Camberwell, VIC 3124

To assist MPG in helping customers, MPG asks customers to follow a simple three-step process:

1. gather all supporting documents relating to the complaint;
2. contact MPG to review your situation and if possible, resolve your complaint immediately; and
3. if the matter is not resolved to the customer's satisfaction, customers are encouraged to contact MPG's Complaints Officer on 1300 668 247 or put their complaint in writing and send it to PO Box 1307, Camberwell, VIC 3124.

MPG will rectify any breach if the complaint is justified and take the necessary steps to resolve the issue.

In certain situations, to deal with a complaint it may be necessary to consult with third parties. However, any disclosure of Personal Information to third parties will be provided with the customer's authority and consent.

After a complaint has been received, MPG sends the customer a written notice of acknowledgement setting out the process. The complaint is investigated, and the decision sent to the customer within thirty (30) days unless the customer has agreed to a longer time. If a complaint cannot be resolved within the agreed time frame or a decision could not be made within thirty (30) days of receipt, a notification will be sent to the customer setting out the reasons and specifying a new date when the customer can expect a decision or resolution.

If the customer is not satisfied with MPG's internal privacy practices or the outcome in respect to the complaint, the customer may approach the OAIC with their complaint:

15.2. Office of the Australian Information Commissioner

**Address:** GPO Box 5218, Sydney NSW 2001  
**Phone:** 1300 363 992  
**Email:** [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)  
**Website:** [oaic.gov.au](http://oaic.gov.au)

16. **Miscellaneous**

16.1. **Notifiable Data Breaches Scheme**

Under the *Privacy Amendment (Notifiable Data Breaches) Act 2017* (“**Privacy Amendment Act**”) MPG is required to notify the Office of the Australian Information Commissioner (“**OAIC**”) in relation to all eligible data breaches.

MPG must notify the OAIC by lodging a Notifiable Data Breach Form as soon as practicable. The Notifiable Data Breach Form is available at the following link:

<https://webform.oaic.gov.au/prod?entitytype=DBN&layoutcode=DataBreachWF>.

Under the Privacy Amendment Act, MPG must also promptly inform clients whose personal information has been compromised by the eligible data breach that a breach of their personal information has occurred.

16.2. **Policy Breaches**

Breaches of this Policy may lead to disciplinary action being taken against the relevant party, including dismissal in serious cases and may also result in prosecution under the law where that act is illegal. This may include re-assessment of bonus qualification, termination of employment and/or fines (in accordance with the Privacy Act).

Staff are trained internally on compliance and their regulatory obligation to MPG. They are encouraged to respond appropriately to and report all breaches of the law and other incidents of non-compliance, including MPG’s policies, and seek guidance if they are unsure.

Staff must report breaches of this Policy directly to the CO.

17. **Retention Of Notifiable Data Breach Forms**

17.1. The CO will retain the completed Notifiable Data Breach Forms for seven (7) years in accordance with MPG’s Document Retention Policy. The completed forms are retained for future reference and review.

17.2. As part of their training, all staff are made aware of the need to practice thorough and up to date record keeping, not only as a way of meeting MPG’s compliance obligations, but as a way of minimising risk.

18. **Policy Review**

18.1. MPG’s Privacy Policy will be reviewed on an annual basis by the CO of MPG, having regard to the changing circumstances of MPG. The CO will then report to the Board on compliance with this Policy.

## Revision History

Revision	Date	Description of changes	Requested By
1.0	30/6/2004	Initial Release	
2.0	22/12/2025	Policy updated to be in line with current legislation.	AG