

Meme Capital Management Pty Ltd

Privacy Policy

This policy was issued in January 2018 and applies to Meme Capital Management Pty Ltd and all our representatives. It explains our policy in relation to the collection and management of personal information we collect from individuals. The Privacy Act requires us to handle personal information in accordance with the Australian Privacy Principles.

Collection of information – What is collected and why we collect it.

Personal information means information, or an opinion about, an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion. We are an Australian Financial Services Licensee (“**AFSL**”). When we provide you with financial services, we may be required by Corporations Act and regulatory requirements to seek to obtain certain personal information about you, including, but not limited to, your:

- Name, date of birth, contact details, tax file number and client identification documents.
- Financial details and information about your employment history to assess whether you qualify as a wholesale client.

Sensitive information

We do not collect sensitive information from you. Sensitive information includes health information, racial information, genetic information, etc.

Anonymity and pseudonymity

You may choose to deal with us anonymously, or using a pseudonym where it is lawful and practicable to do so.

How is information collected?

We collect personal and sensitive information in a number of ways, including:

- Directly from you such as when you provide the information at meetings, by phone, email, in application forms and when you visit our websites. Our website may use "cookies". Cookies are small data files that are downloaded from our website and stored on your computer when you visit our website. Cookies are used to allow us to see which pages and what information is of most interest to visitors to our website, which in turn enables us to improve our offerings to our customers. Your computer's web browser will allow you to configure your computer to refuse to accept cookies. You can also delete cookies from your computer's hard drive at any time. However, please note that doing so may hinder your access to valuable areas of information within our site.
- Indirectly from your accountants and third parties once you have authorised us to obtain such information or authorised other parties to provide us with this information.

Are you obliged to provide us personal information?

You are not required to provide us the information that we request, or to allow us to collect information from third parties. However, where you choose not to provide us with the information we request, we may not be able to provide you with services that you have requested from us, and we may elect to terminate our arrangement with you. Importantly, if you provide either inaccurate or incomplete information to us you risk obtaining products or services that may not be appropriate or suitable for your needs and you may risk suffering a financial detriment or financial loss.

What happens if we obtain information about you which we have not solicited?

Where we receive unsolicited personal information about you, we will consider if we could have collected the information if we had solicited the information. Where we determine that we could have collected the personal information from you, we will treat your personal information in the same manner as if we have solicited the information directly from you. Where we determine that we could not have collected the personal information, we will destroy the information or ensure that the information is de-identified as soon as practicable.

Use of information

We use your personal information for the primary purpose for which the information was obtained. As an AFS licensee, that will typically mean for the purpose of:

- Providing financial services to you.
- Providing updates in relation to your investments.
- Acquiring, varying or disposing of financial products based on your instructions.

We may also use the information for the secondary purpose of attempting to identify other products and services that may be of interest to you.

Do we disclose personal information for marketing?

We may use your personal information to offer you products and services that we believe may interest you. We may also disclose your personal information to external associates and service providers who assist us to market our products and services.

If you do not want to receive marketing offers from us please inform us. Our contact details are included at the end of this policy.

Disclosure of information

We may disclose your personal information to:

- Our representatives.
- The product issuers of products and services that you have elected to acquire, vary or dispose of using our assistance.
- Our external service providers.

For example, information may be disclosed to the following parties:

- Product issuers for the purpose of acquiring, varying or disposing of financial products based on your instructions.
- Other parties involved in the administration of your financial products (e.g. custodians, trustees, fund administrators, product registries, mail houses, etc.).
- Our external service providers (e.g. IT providers, professional advisers and contractors).
- Government and regulatory authorities and other organisations, as required or authorised by law.
- Any person considering acquiring, or acquiring, an interest in our business.

Government related identifiers

Although in certain circumstances we are required to collect government identifiers such as your tax file number, Medicare number or pension card number, we do not use or disclose this information other than when required, authorised by law or unless you have voluntarily consented to disclose this information to any third party.

Cross-border disclosure of personal information

We do not currently directly disclose your personal information overseas, however some personal information may be incidentally disclosed as part of the Australian Government's obligations under a number of international tax evasion initiatives.

FATCA (a US regulatory requirement) and the CRS (a regulatory requirement developed by the Organisation for Economic Co-operation and Development (OECD)) aim to deter tax evasion. The Australian government has entered into an Inter-Governmental Agreement (IGA) with the US Government for the exchange of US tax payer information and has signed up to the CRS and enacted domestic law to implement the CRS. Under the IGA and domestic laws, Australian financial institutions (including managed investment schemes) must identify all of its account holders (eg. investors) and report account information of foreign tax residents to the Australian Taxation Office (ATO). The ATO may then exchange this information with the foreign jurisdiction of which the account holder is a tax resident (if that jurisdiction is the US or is otherwise participating in the CRS).

Storage and security of information

We store personal information in our computer database and hard copy files. We take reasonable steps to ensure the personal information collected and held by us is protected from misuse, interference, loss, unauthorised access, modification or disclosure.

In the event you cease to be a client of ours, any personal information which we hold about you will be maintained for a period of not less than 7 years in order to comply with legislative and professional requirements.

Access and correction of information

You may request access to the personal information we hold about you, and we will respond within a reasonable period after the request is made. Where we provide you access to such

information, we may charge a reasonable fee to cover our costs. We will disclose the amount of such costs to you prior to providing you with the information.

We will take reasonable steps to ensure that the personal information that we collect, use or disclose is accurate, up-to-date, complete and relevant. In the event that you become aware, or believe, that any personal information which we hold about you is inaccurate or incomplete, you may contact us to correct the information.

If we disagree about the correction you have supplied, and refuse to correct the personal information, or if we believe that we are unable to comply with your request to access the personal information that you have provided us, we will give you a written notice to that effect. You have a right to make a complaint if you disagree with our decisions in relation to these matters (see below).

Complaints

If you believe that we have breached the Australian Privacy Principles, or disagree with a decision that we have made in relation to our Privacy Policy, you may lodge a complaint with us. To enable us to understand and deal with your complaint in a timely fashion you should set out a brief description of your privacy problem, the reason for your complaint and what action or remedy you are seeking from us. Please address your complaint to our Privacy Officer. Our contact details are included below.

Your complaint will be investigated and responded to within 30 days. If you are not satisfied with the outcome of your complaint, you are entitled to contact the Office of the Australian Information Commissioner.

Policy updates

This policy is subject to change from time to time. The most current version of our Privacy Policy can be obtained from our website (www.memecapital.com.au) or by contacting us.

Contact details

Privacy Officer: Mr Robert Marie
Postal Address: PO Box Q423, QVB Sydney NSW 1230
Telephone: (02) 8012 0638
E-mail: invest@thetaasset.com.au