

Crescent Wealth Funds Management (Aust) Limited (“Crescent Wealth”)

Privacy Policy

Crescent Wealth’s adoption of the Australian Privacy Principles (APPs) and the requirements of the *Privacy Act 1988 (Cth)* and the *Privacy Amendment Act 2012* (‘the Act’) formalises our commitment to ethical conduct and practice in regard to privacy. Crescent Wealth seeks to observe the privacy safeguards laid down by the Act when collecting, storing, using and disclosing personal and sensitive information. We also give individuals access and correction rights in relation to their personal information in compliance with the Act. If you are an investor in superannuation or managed funds, please be assured that your personal information will only be used in the manner and for the purposes set out below.

Collecting information – from you

Crescent Wealth collects information from investors in our products and from people who make enquiries about our products via letter, email or telephone.

We will collect your personal information including name, address, date of birth, gender, Tax File Number (TFN) and other contact information from you which is deemed necessary to manage your accounts. We will also collect your personal information, as provided by you, if you make an enquiry about our product.

We collect information about our investors when they complete application or other forms or transactions related to their investments. We may also obtain information about you from your authorised adviser i.e. financial planner, accountant, and solicitor. We may use public search sources available on the internet such as telephone listings should we need to contact you and your contact detail on file may be reasonably considered out of date.

We may also be provided with information about Crescent Wealth superannuation members from their employers, doctors and insurance companies, particularly where a member requests insurance coverage, makes an insurance claim, or request early release of benefits.

In all cases we endeavour to ensure that information collected is correct. If you are an investor you will receive transaction confirmations, correspondence and periodic statements from us. We ask that you check this information and [contact us](#) immediately should you become aware that your details require updating or alteration.

Online and Client Services

Crescent Wealth offer an extensive website and on-line applications to make accessing information on our products and your investments easier.

Information regarding your account is accessible by you over the telephone where sufficient verification information is supplied, in accordance with our requirements and compliance with the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)* (‘AML’).

Why we need your personal information:

Neither Crescent Wealth nor any of its products is associated or affiliated with Crescent Capital Partners.

We use information collected about you for a number of purposes:

- to identify you;
- to provide information to you and to ask you whether you are interested or satisfied with our products;
- assist you in queries you may have
- to administer your investments with us
- for market research and analysis
- for product development
- to meet regulatory obligations.

Sharing of Personal Information

You should be aware that information may pass between members of the Crescent Wealth departments for statistical and marketing analysis. Information about you may also be passed to:

- The custodian, an external organisation that holds assets on behalf of our managed investment schemes and superannuation fund.
- The Trustee.
- Fund administrator or our superannuation member administrator.
- Auditors appointed by Crescent Wealth to ensure the integrity of our operations and policies.
- Insurance provider.
- Any person acting on your behalf such as your financial advisor administrator, trustee or guardian, provided you or a legal authority (e.g. under court orders) has instructed us in writing to do so.

We ensure our service providers are experienced in administration and are also subject to the provisions of the Privacy Act. Under our contracts with them, they have a contractual obligation to abide by privacy law and to protect your information.

Your information may also be passed to third parties to assist in the administration of your account, for example to a mail house to mail out distribution or periodic statements.

If you are an investor in Crescent Wealth Superannuation Fund, information about you may also be provided to your insurance company and agent, retirement savings accounts, or other super funds if you chose to rollover.

There are instances where we are legally obliged to pass on information about you. The following list of compulsory disclosures (i.e. disclosures we must make) provides you with examples but is not intended to be exhaustive or complete:

- in accordance with legislative requirements or authority (e.g. your tax file number and the taxable income of your account; deposits reportable under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)* ('AML'));
- in accordance with the legislative requirements of the administration of managed investment schemes or the superannuation fund – reporting or assisting in the investigation of unlawful activity where there is a basis for suspecting such activity;
- to enforcement bodies with statutory authority e.g. protection of public revenue (tax) such as the Australian Taxation Office (ATO);
- in any criminal procedure with a court authority;

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- laws relating to the confiscation of the proceeds of crime;
- proceedings by any enforcement or administrative body in a court or tribunal.

We will not pass on your personal information to unrelated parties for their marketing purposes. We would seek your informed consent in the event this policy changes.

Financial Advisors and Accountants

If your membership involves a financial adviser or accountant or you have chosen the Crescent Wealth Super Fund (CWSF) as your Choice Fund with your employer, we will disclose the personal information that is necessary to manage or administer your account and benefits, to that third party.

If you wish to amend or withdraw your authority for your financial adviser or employer to act on your behalf, you must advise us in writing.

The quality of the information we collect

We endeavour to ensure that any information we collect, use or pass on is up-to-date and accurate. We request that you [contact us](#) in the event your details change.

The security of information about you

It is not appropriate for information about you to be de-identified or destroyed. We have statutory requirements to retain our records for up to a period of seven years. Crescent Wealth take precautions to prevent the misuse, loss and unauthorised access or modification or disclosure of your information. These include the use of verification data before information about investments is provided over the telephone or via the internet, restricted access to files, security checks on computer data, securing of data held on company networks, and a contractual requirement for service providers to use appropriate mechanisms to protect personal information. Information management is subject to an in-house compliance system with defined standards and monitoring.

Please note that we cannot guarantee the privacy of your information if you choose to correspond with us via email.

Information about our management of your information

If you decide to invest with us, our Product Disclosure Statements (PDSs) will alert you to various matters you need to be aware of when supplying us with your information. A brief statement of our privacy policy is outlined on the web. This policy is available to any person who requests it. In addition, we would like to encourage you to contact our Privacy Officer (see below) if you have any individual concerns relating to the collection, use or security of information about you.

Access and/or correction of your information

Please contact us immediately should you become aware that any information we have about you is incorrect. In the event we dispute a correction you wish to make, we shall place your disputed information on the file, together with the unaltered statement of information, until such time as the matter can be resolved.

Unless there are exceptional circumstances around your files, we will provide you with copies of our current records about you. If you wish to see your information, we ask that you make a request in writing and allow us seven working days in which to forward it to you.

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Circumstances in which access to your records might be denied or restricted could be as follows. Please note this list is not intended to be exhaustive:

- providing access would have an unreasonable impact on the privacy of another individual;
- the information relates to existing or anticipated legal proceedings between you, us or any related party and would not be available by a process of discovery in those proceedings;
- providing access would prejudice negotiations we have with you;
- providing access would be unlawful or likely to prejudice an investigation into unlawful activity;
- the request is frivolous or vexatious.

Using the identifier of another organisation

We use identifier codes and records to identify you and maintain records holding information about you. Although we may have your Australian Business Number or Tax File Number, for instance, it would be used only for the purposes for identification with the relevant organisation as prescribed by that organisation.

Your ability to deal with us anonymously

You may contact us and seek to obtain any general information or assistance you wish without identifying yourself. However, for reasons of security, you will not be able to obtain information about your investments without identifying yourself first.

Direct Marketing – How we capture information on our websites

The use or disclosure of personal information for direct marketing purposes, except in specified circumstances is prohibited. Subject to the operation of other direct marketing legislation, such as the Spam Act 2003.

The Crescent Wealth website uses cookies, tracking pixels and related technologies to better serve visitors of our website. Cookies are small data files that serve automatic text, image, video, or interactive media advertisements by third party publishers. These are targeted to site content and audience.

Crescent Wealth use publishers such as AdRoll, Pardot or Google AdSense whose cookies may be stored on your device. Our site uses cookies dropped by Crescent Wealth or third parties for a variety of purposes including to operate and personalize the website. Cookies may also be used to track how you use the site for targeted advertising purposes on other websites.

The information that is collected and logged on our behalf through this technology is not information from which you can be personally identified.

You may not be able to access some parts of our website if you choose to disable the cookie acceptance in your browser, particularly the secure parts of the website. We therefore recommend you enable cookie acceptance to benefit from all the services on the website.

You can opt out of receiving targeted advertising by visiting an online service such as Google Ads Preference Manager, the Digital Advertising Alliance (DAA) opt-out site www.aboutads.info, or the

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Network Advertising Initiative (NAI) opt-out site at networkadvertising.org/choices, or for those in Europe, the European Digital Advertising Alliance (EDAA) opt out site at youronlinechoices.eu.

Third Party Websites

The Crescent Wealth website has links to external third party websites that may benefit the user. External websites should contain their own privacy statements and we recommend you review them when using their websites. Please note, however, that third party websites are not covered by this policy, and these sites are not subject to AMP's privacy standards and procedures unless otherwise specified.

Trans-border data flows

Crescent Wealth may store your information in cloud or other types of networked or electronic storage. The information we back-up on our clients is held on computing storage held in the USA and Singapore. We take all reasonable steps to ensure overseas recipients do not breach the Australian Privacy Principles. They are obliged to protect the privacy and security of your personal information and hold it only for the purpose for which it has been agreed.

The current list¹ of countries and regions to which your personal information could be sent is set out below:

Fund administration, investment management and investment administration	Singapore, Hong Kong, Malaysia, United States of America, United Kingdom
TAL Insurance. TAL may need to disclose customer information, include, but are not limited to, those providing quality assurance and reinsurance services.	Japan, Great Britain, United States of America, New Zealand, India, South Africa, Switzerland, Germany, Philippines, France, and other EU countries. An updated list of the countries to which TAL discloses customer

Sensitive information

Sensitive information is information about you which is information or an opinion about your racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union or criminal record. Information in respect of your health is also sensitive information.

Generally, we would not collect sensitive information about enquirers or investors. However, investors in Crescent Wealth Superannuation Fund may need to send information regarding their health, including copies of records, reports and opinions. We require your consent to have this information and we will request you provide this in writing at the time it is required, typically if you apply for insurance or make an insurance claim. We may also need to collect sensitive information as part of the AML requirements. We will only seek to collect from you the minimum amount of information that is required.

¹ Current as at April 2017

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Gaining Access to your personal information

You can gain access to your personal information. In some cases we may be able to deal with your request over the telephone. For more complex requirements we will need to send you a form. Please contact us on the numbers below. We may monitor telephone calls for training and security purposes

Have you a comment or complaint about your privacy?

If we have breached any of our obligations in keeping your information, or you are uncomfortable about any of our information management practices which have come to your attention, please do not hesitate to contact our Privacy Officer. We expect our conduct to deliver standards and performance of the highest order and welcome your comments.

If you are not satisfied with our response or would like to know more about your privacy rights, you can contact the Office of the Australian Information Commissioner by calling 1300 363 992 or visiting the website at www.oaic.gov.au

Contact us: by calling 1300 926 626; or by emailing: info@crescentwealth.com.au

Or by writing to:

The Privacy Officer
Crescent Wealth
L13, 131 Macquarie Street
Sydney, NSW 2000.

Making a privacy complaint: We aim to manage your information and service you to the highest standard possible, however issues may arise. Crescent Wealth have an internal complaint policy and supporting procedure which provides a standard method and measures to work to resolve the issue. If we fail to resolve the issue with you, we are also a member of an external independent body, the Financial Ombudsman Service, who can assist in mediating any disputes.

Additional Information

We reserve the right to modify this Privacy Policy in accordance with our current privacy practices. These updates will be updated on our website. You may request a copy of this Privacy Policy free of charge. However, we reserve the right to reject your request for access in particular circumstances.

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