

**W.A. Blue Gum Limited**  
**ACN 060 179 982**  
**AFS Licence No: 246264**



**W.A. Blue Gum Limited**

ACN 060 179 982 AFS Licence 246 264

Level 33  
 140 William Street  
 Melbourne Vic 3000  
 t (03) 9242 4797  
 f (03) 9242 4778  
 e [info@wablugum.com.au](mailto:info@wablugum.com.au)

## Privacy Policy

W.A. Blue Gum Limited and its related entities (referred to as **WABG, we** or **our**) are committed to the protection of your Personal Information in accordance with the Australian Privacy Principles set out in the *Privacy Act 1988 (Cth)* as amended from time to time (**Privacy Act**).

This Privacy Policy describes the manner in which WABG collects, holds and uses Personal Information that is covered by the Privacy Act. It is not intended to cover categories of Personal Information that are not covered by the Privacy Act. This Privacy Policy is part of our open and transparent management of your personal information. If you wish to make any inquiries regarding this Privacy Policy, you should contact WABG in any of the ways specified in clause 15.

WABG will, from time to time, review and update this Privacy Policy including to reflect our current privacy practices or to take into account any new laws, regulations and technology. All Personal Information held by WABG will be governed by our most recent Privacy Policy, posted on our website ([www.wablugum.com.au](http://www.wablugum.com.au)) (**Website**). Our most recent Privacy Policy will apply to our collection, use and disclosure of Personal Information.

### 1. What is "Personal Information"?

"**Personal Information**" is information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information is true or not, and whether recorded in a material form or not.

### 2. What Personal Information do we collect and hold?

WABG and third parties acting on our behalf may collect and hold Personal Information about a number of people such as names, gender, dates of birth, contact details (including addresses, phone numbers and emails, whether personal or for work), financial information, payment details, bank account details, tax file numbers, ABN/ACN and/or products and services information and preferences.

### 3. Why do we collect Personal Information?

- 3.1 WABG collects Personal Information from investors, employees, contractors and other individuals that is reasonably necessary for one of more of our functions or activities, including to establish and support the ongoing administration of your investment in our registered managed investment schemes (**Investment**), and to advise you of new developments relevant to your Investment. This also allows us to market and sell our products and services, meet any regulatory requirements which apply to our business, and conduct employee related activities.
- 3.2 You have the option to deal with us anonymously or by using a pseudonym. However, you acknowledge that where this is impractical (for example when you contract with us), or where the law or a court order provides otherwise, we are not required to provide these options to you.
- 3.3 If you choose not to provide your Personal Information to WABG, we may not be able to process your application or administer your Investment, and may not undertake certain activities for you such as providing you with requested information, products or services.

### 4. When and how do we collect Personal Information?

- 4.1 WABG collects Personal Information when you (or a representative authorised by you): submit an application form, visit our Website, request information about us or our products or services, provide feedback, respond to a survey, change your content or email preferences, contract with us, invest in one of our agribusiness projects, fill in a form on our Website, or contact us by telephone, facsimile, email, post or in person.
- 4.2 WABG may also collect Personal Information about you via third parties including from our business partners and other service providers who assist us in our business operations.

- 4.3 In some circumstances we may receive Personal Information that we have not requested. If this occurs, we will comply with our obligations under the Privacy Act. You acknowledge that we may de-identify and/or destroy this information unless we are required to keep it by law.

## 5. How do we hold Personal Information?

- 5.1 WABG will generally hold Personal Information in physical records, electronic records on our servers and, where necessary, electronic records on third party servers located overseas. Personal Information that is held by us in hard copy is stored securely on our premises and is only disclosed or used for the purposes described in this Privacy Policy.

## 6. Information collected via our Website

- 6.1 WABG will not collect any Personal Information about users of our Website except when they knowingly provide it or as otherwise described below. For example, WABG may collect Personal Information from users of the Website when they:

- (a) complete an online form; and/or
- (b) otherwise correspond with WABG.

### ***Click Stream Data***

- 6.2 When you visit and browse our Website, our Website host may collect Personal Information for statistical, reporting and maintenance purposes. Subject to clause 8.6 the Personal Information collected by our Website host will not be used to identify you. The information may include:

- (a) the number of users visiting our Website and the number of pages viewed;
- (b) the date, time and duration of a visit;
- (c) the IP address of your computer; or
- (d) the path taken through our Website.

- 6.3 WABG's Website host uses this information to administer and improve the performance of our Website.

### ***Cookies***

- 6.4 Cookies are small text files that are transferred to a user's computer hard drive by a website for the purpose of storing information about a user's identity, browser type or website visiting patterns. The cookies may be "temporary" (also called "session cookies", since they are deleted when the connection ends) or "permanent" (they remain stored on the user's hard disk, unless the user deletes them).

- 6.5 If you access our Website, a cookie is downloaded onto your computer's hard drive when you first log on to our Website. You can adjust your internet browser to disable cookies, however WABG may not be able to provide you with all the service or functionality you require on our Website if you choose to do so.

### ***Web Beacons***

- 6.6 Web beacons are images that originate from a third party site to track visitor activities. WABG may use web beacons to collect aggregate data and provides this information to our Website host to administer and improve the performance of our Website.

### ***Third Party Links***

- 6.7 Our website may include links to other websites, plug-ins and applications provided by others, including those acting on our behalf. By clicking on those links or enabling those connections, you may allow third parties to collect or share data about you, and these third parties may have their own privacy policies. We make no representations or warranties in relation to the privacy practices of any third-party provider or website. We do not control third party websites and are not responsible for their privacy policies or actions. When you leave our website, we encourage you to read the privacy policy and terms of use of every website you visit.

## 7. How WABG uses the Personal Information it collects about you

- 7.1 We may use your Personal Information for the primary purpose for which the information was collected. WABG uses the Personal Information it collects about you for our business functions and activities, which may include the following:

- (a) to provide you with information, products or services you have requested;
- (b) to open and administer your Investment and keep you informed about your Investment and opportunities available to you;
- (c) to promote and market our products and services to you;
- (d) to personalise and customise your experiences on our Website;
- (e) to help WABG research the needs of its clients;
- (f) to conduct research for the purposes of improving existing products or services or creating new products or services;
- (g) to provide you with ongoing information about WABG and its activities;
- (h) to allow us to provide third party information and offers in which we believe you may be interested;
- (i) to comply with regulatory or other legal requirements;
- (j) for purposes related to the employment of our personnel and providing internal services to our staff; and
- (k) for any other purpose communicated to you at the time that the Personal Information was collected or for which you provided your consent.

7.2 WABG may use your Personal Information for a secondary purpose if that secondary purpose is related to those purposes in clause 7.1, if we have your consent or if otherwise provided for under the Privacy Act.

7.3 WABG may use your Personal Information to provide you with direct marketing materials if you would reasonably expect us to or if you consent to receive direct marketing materials. We will seek your consent to provide you with direct marketing materials if we have obtained your Personal Information from a third party. Direct marketing material may include promotional material about WABG or the products or services offered by WABG.

7.4 Any electronic message that we send will identify us as the sender and will include relevant contact details and an option to unsubscribe from further email communications. You may opt out of receiving direct marketing material by contacting us in any of the ways specified in the direct marketing materials or as set out in clause 15.

7.5 Generally, we will only collect and use your Personal Information in accordance with this Privacy Policy. In the event that we collect or use Personal Information in ways other than as stated in this Privacy Policy, we will ensure that we do so in accordance with the Privacy Act.

## **8. Who do we disclose your Personal Information to?**

8.1 Depending on the nature of your relationship with WABG, we may disclose your Personal Information to shareholders, officers and employees of WABG, other businesses within our group of companies, service providers who assist us in our business operations when this is necessary for them to effect their services, third parties who may acquire us or to whom we may choose to sell, transfer, or merge parts of our business or our assets, government bodies, regulatory authorities and law enforcement bodies and third parties, or otherwise as required by law.

8.2 WABG may also disclose your Personal Information to our Website host or service providers in certain limited circumstances, for example when our Website experiences a technical problem or to ensure that it operates in an effective and secure manner. To the extent that we do share your Personal Information with a service provider, we would only do so if that party has agreed to comply with our privacy standards as described in this Privacy Policy.

8.3 We may also share non-personal, de-identified and aggregated information for research or promotional purposes. We will not sell your Personal Information to third parties for marketing purposes.

8.4 You may authorise WABG to disclose Personal Information that it holds about you to your financial adviser, administrator, or other person nominated by you.

8.5 Unless we have another lawful means for processing your Personal Information, we will obtain your opt-in consent before we share your Personal Information with any company outside of WABG and its related entities for promotional and marketing purposes. You have the right to elect not to receive any third party promotional or marketing communications at any time by using an "Unsubscribe" op-out link within any emails received or contacting the third party directly.

8.6 Unless otherwise specified in this Privacy Policy, WABG or WABG's Website host will not disclose any of your Personal Information to any other organisation unless the disclosure is required by law or is otherwise permitted by the Privacy Act.

## **9. Disclosure of your Personal Information overseas**

- 9.1 We do not currently disclose your Personal Information outside of Australia. In future we may choose to disclose your Personal Information outside of Australia to an entity in a foreign country and if practical will provide you with details of these countries when this occurs. It is possible that such entity may be subject to foreign laws that do not provide the same level of protection of Personal Information as in Australia. We will take steps to ensure that these overseas entities are obliged to protect the privacy and security of your Personal Information in accordance with the Privacy Act and use it only for the purpose for which it is disclosed.

## **10. Storage and security of Personal Information held by WABG**

- 10.1 WABG will take reasonable steps to protect your Personal Information from misuse, interference and loss and from unauthorised access, modification or disclosure.
- 10.2 WABG aims to keep your Personal Information secure and up to date. We will comply with our obligations under the Privacy Act in relation to any Personal Information that we handle, including information which is held on WABG's computer systems.
- 10.3 Personal Information that is held by WABG in hard copy is stored securely on its premises and is only disclosed or used for the purposes described in this Privacy Policy.

## **11. Updating and correcting your Personal Information**

- 11.1. We will take reasonable steps to ensure that the Personal Information that we hold is accurate, up-to-date and complete. If we believe that Personal Information we have collected about you is inaccurate, out-of-date, incomplete, irrelevant or misleading, we will take reasonable steps to correct that information.
- 11.2. You can update your Personal Information at any time by contacting WABG in any of the ways specified in clause 15. WABG welcomes any changes to your Personal Information so as to keep our records up to date.
- 11.3. You do not normally have to pay a fee to access your Personal Information or to exercise any of your other rights under the Privacy Act. However, we may charge a reasonable administration fee if your request is manifestly unfounded, repetitive or excessive.
- 11.4. We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Information (or to exercise any of your other rights). This is a security measure to ensure that Personal Information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to help speed up our response.
- 11.5. If we restrict or deny you access to your Personal Information, we will provide you with written reasons for the restriction or denial.

## **12. How long will WABG keep your Personal Information?**

- 12.1 We will keep your Personal Information only for as long as required for our business purposes and otherwise as required by Australian law.
- 12.2 Where we no longer need to keep your Personal Information in accordance with clause 12.1, we will take reasonable steps to destroy or de-identify your Personal Information.
- 12.3 If you wish to have your Personal Information destroyed or de-identified, please let us know and we will take reasonable steps to do so (unless we need to keep it for legal, auditing or internal risk management reasons).

## **13. Finding out what Personal Information WABG holds about you**

- 13.1 You are entitled to access Personal Information that WABG holds about you. If you request access to your Personal Information, we will grant your request unless providing you with access would unreasonably impact upon the privacy of others or is not otherwise permitted under the Australian Privacy Principles or at law. If we refuse your request to access your Personal Information, we will provide you with written reasons for the refusal.
- 13.2 A request for access can be made by contacting WABG in any of the ways specified in clause 145.

## **14. Data Breach Reporting**

- 14.1 In the event of a notifiable data breach, we must comply with our obligations under the Privacy Act and report the breach to the Office of the Australian Information Commissioner (**OAIC**) and those individuals who are affected by the breach.
- 14.2 A data breach is a “notifiable data breach” if it is a breach which is likely to cause “serious harm” to an individual. Serious harm is not defined in the Privacy Act but includes physical, psychological, emotional and reputational harm as well as financial and economic harm.
- 14.3 In determining whether a data breach does or may cause serious harm, we will consider the following factors:
- a) the kind or kinds of information involved;
  - b) the sensitivity of the information;
  - c) whether the information is protected (e.g. encrypted, password protected) and the strength of those security measures;
  - d) the persons who have or could obtain the information;
  - e) the likelihood that the information could be misused;
  - f) the nature of any potential harm that would result from the data breach; and
  - g) any other relevant matters.
- 14.4 We have 30 days from the time we become aware, or ought to have become aware, of a data breach to assess and report it. If, in our assessment, the data breach does not constitute a notifiable breach, we are not required by law to report it.
- 14.5 If you think that a data breach has or may have occurred which would affect your Personal Information, you have the right to contact us for information about the data breach (including whether your Personal Information was affected). If we do not respond to your request, or you are not satisfied with our response, you have the right to make a complaint to the Office of the Australian Information Commissioner in writing. For more information, visit <https://www.oaic.gov.au/privacy/your-privacy-rights/data-breaches/make-a-data-breach-complaint>.

## 15. How to contact us and more information

- 15.1 If you feel that your privacy has not been respected or that WABG has conducted itself inconsistently with this Privacy Policy, the Australian Privacy Principles, a registered APP Code and/or the Privacy Act in respect of your Personal Information, or for any other queries, problems, complaints or communication in relation to this Privacy Policy, please contact us in any of the following ways:

Address: Level 33, 140 William Street, Melbourne VIC 3000

Telephone: 1300 888 511

Email Address: [info@wabluegum.com.au](mailto:info@wabluegum.com.au)

Attention: Tom May

- 15.2 You can find out more information about the Privacy Act and the Australian Privacy Principles from the Office of the Australian Information Commissioner. The Information Commissioner may be contacted at [www.oaic.gov.au](http://www.oaic.gov.au) (email - [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)).

Last updated: 20 May 2025