

## Privacy Policy

### 1. Introduction

Pindara Partners Pty Ltd and its related bodies corporate (“Pindara”, “we”, “us” or “our”) are committed to protecting your privacy and handling personal information in accordance with the *Privacy Act 1988* (Cth) and the Australian Privacy Principles.

This Policy outlines the types of personal information that we usually collect about you, the purposes for which we collect it, to whom we disclose it, how we hold and keep it secure and your rights in relation to your personal information, including how to complain and how we deal with complaints. In this Policy, **personal information** is broadly any information or opinion about an identified individual or an individual who is reasonably identifiable. **Sensitive information** is a subset of personal information that is generally afforded a higher level of protection by privacy laws. It includes, for example, information about your racial or ethnic origin, religious beliefs, sexual orientation or practices and criminal record.

This Policy does not apply to acts or practices directly related to a current or former employment relationship between Pindara and an individual, and to an employee record held by Pindara relating to that individual. This Policy applies to personal information about prospective employees, unsuccessful applicants and contractors.

### 2. Personal information we collect

We collect and hold personal information about you and your interactions with us. The kinds of information we collect depend on your relationship with us and may include information that is reasonably necessary for our investment management, financing, capital solutions and related business activities. We may collect and hold personal information including:

- your name, date and place of birth, address, email address and telephone number;
- identification and verification information, including copies and details of identity documents, citizenship and residency information, and government related identifiers;
- financial, investment and transaction information, including bank account details, tax residency and tax information, source-of-funds information and information about your financial position or creditworthiness;
- information provided in connection with investment opportunities, financing transactions and due diligence processes, including information about directors, trustees, beneficial owners, guarantors and authorised representatives;
- information contained in correspondence and communications with us;
- employment, professional, education and reference information provided in connection with an employment or contractor application; and
- technical and usage information collected through our website, including IP addresses, device and browser information.

We will only collect sensitive information with your consent and where the information is reasonably necessary for one or more of our functions or activities, or otherwise where the collection is required or authorised by law.

Where you provide us with personal information about another individual, you must ensure that individual is aware of this Policy and of the matters set out in it.

### 3. How we collect personal information

We may collect personal information directly from you when you:

- contact us;
- subscribe to updates;
- apply to invest with us;
- seek financing from us;
- attend meetings; or
- apply for employment.

We may also collect personal information from advisers, brokers, professional service providers, identity verification, anti-money laundering, sanctions screening and fraud prevention providers, credit information providers, employers, referees, counterparties, public registers, government agencies and other third parties where appropriate.

#### 4. [How we use personal information](#)

We may use personal information for:

- providing and administering our investment management, financing, capital solutions and related services, and for related purposes that you would reasonably expect (including investor onboarding, distributions, transfers and withdrawals);
- assessing and executing investment opportunities, assessing borrowers, guarantors and other transaction parties, administering and monitoring transactions, and enforcing or recovering loans and security;
- managing our business, including internal accounting, administration, insurance, fraud prevention, record-keeping, dispute management and business planning;
- assessing, processing and managing employment and contractor applications;
- handling any complaints, inquiries, disputes and legal claims;
- where permitted by law, notifying you about products, services and opportunities we offer;
- improving and developing our products and services;
- operating, securing, analysing, improving and personalising our website for you;
- complying with applicable laws and regulatory requirements, including anti-money laundering, counter-terrorism financing, sanctions screening, tax reporting and know-your-customer requirements; and
- any other purpose to which you have consented or where the use is otherwise required or authorised by law.

Where we collect your tax file number, we handle it in accordance with the *Privacy (Tax File Number) Rule 2015* and do not use or disclose it except as permitted by applicable law.

If you do not provide requested information, we may be unable to provide services, assess applications, complete onboarding processes or proceed with transactions.

#### 5. [Disclosure of personal information](#)

In the course of conducting our business, we may disclose personal information to:

- Pindara's related entities;
- trustees, custodians, security trustees, fund administrators, registry providers and other organisations involved in providing, managing or administering our products or services;
- professional advisers including lawyers, accountants and consultants;
- banks, insurers, investors and transaction counterparties;

- identity verification, anti-money laundering, sanctions screening, credit assessment, cloud hosting, CRM, document management, enforcement and recovery service providers;
- regulators, courts and government agencies; and
- other parties where you have consented to the disclosure or where it is required or authorised by law.

We do not sell personal information.

We do not adopt a government related identifier as our own identifier of you. We only use or disclose a government related identifier where it is reasonably necessary to verify your identity, where it is reasonably necessary for us to fulfil our obligations to a government authority, or where the use or disclosure is required, authorised or permitted by law.

## 6. Direct marketing

From time to time, we may also use your personal information to send you information about products and services we think may be of interest to you. We may contact you by various means, including by mail, telephone, email, SMS or other electronic means. If you do not want to receive direct marketing from us, you can opt out by following the unsubscribe function in the marketing communication or contacting us using the contact details at the end of this Policy.

## 7. Security and retention; overseas disclosure

We hold your personal information in hard copy and electronically, including through third party technology and storage providers. We are likely to disclose personal information to recipients located outside Australia, including in the United States, the United Kingdom, Japan and countries in the European Union. We take steps that are reasonable in the circumstances to protect your personal information from misuse, interference and loss, and from unauthorised access, modification or disclosure.

Personal information is retained only for as long as required for our business purposes and legal obligations. If we no longer need to hold your personal information for any reason and we are no longer required by law to keep it, we will take reasonable steps to de-identify or destroy that information. These steps may vary depending on the nature of the information, the way it was collected and how it was stored.

## 8. Access and correction

You may request access to personal information we hold about you and request correction of information that is inaccurate, incomplete or out of date. We will need to verify your identity before undertaking any action.

Requests should be directed to us using the contact details below. Subject to any applicable exceptions or requirements, we will use reasonable endeavours to provide you with access to the personal information you request within a reasonable time and usually within 30 days. If we decide to refuse your access or correction request, we will provide our reasons in writing and explain how to complain.

## 9. Data breaches

Where we have reasonable grounds to suspect that a data breach involving personal information may have occurred, we will assess the matter promptly. If we have reasonable grounds to believe that a data breach is likely to result in serious harm to any individual whose personal information is involved, we will notify the affected individuals and the Office of the Australian Information Commissioner as required by law.

## 10. Complaints

If you have a complaint about how we have handled your personal information, please contact us. We will investigate your complaint and respond within a reasonable time and usually within 30 days. If you are not

satisfied with our response, you may contact the Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au) or on 1300 363 992.

#### 11. [Contact us](#)

If you have a question or comment about this Policy or wish to make a complaint or exercise your privacy rights, please contact us using the following details:

Pindara Partners Pty Ltd  
Level 12, 167 Eagle Street  
Brisbane QLD 4000

Email: [info@pindara.com.au](mailto:info@pindara.com.au)  
Phone: +61 7 3523 7006

#### 12. [Changes to this Policy](#)

We may update this Policy from time to time. The current version will be available on our website.  
Last updated: 8 September 2026