

Version	1
Approved by	DFM Board 15 Nov 2024
Date	8 November 2024
Endorsed by	

Diogenes Funds Management Ltd Privacy Policy

1. Introduction

Diogenes Funds Management Ltd (DFM) is committed to protecting the privacy of individuals and ensuring the confidentiality and security of personal information. This Privacy Policy outlines how DFM collects, uses, discloses, and manages personal information in accordance with the **Privacy Act 1988 (Cth)** and the **Australian Privacy Principles (APPs)**.

2. Scope

This policy applies to all personal information collected by DFM in connection with its role as a Responsible Entity managing retail managed investment schemes. It covers the handling of information related to investors, clients, employees, service providers, and other individuals who interact with DFM.

3. Objective

To meet DFM's obligations and ensure compliance with Australian privacy laws.

4. What is Personal Information?

Personal information refers to any information or opinion about an identified individual or an individual who is reasonably identifiable. This includes, but is not limited to:

- Name
- Date of birth
- Contact details (address, phone number, email)
- Tax File Number (TFN)
- Financial information (investment details, bank account information).

5. Collection of Personal Information

5.1 Methods of Collection

DFM may collect personal information directly from individuals in various ways, including:

- Completing application forms for managed investment schemes
- Email, telephone, or in-person communications
- Through DFM's website or other online platforms
- From Diogenes Investing, Investment Manager
- From other third parties, including financial advisers and brokers, where necessary.

5.2 Types of Information Collected

The type of personal information collected depends on the nature of the interaction. Common types include:

- Contact information for communication purposes
- Financial details necessary to manage investments
- Identification information required to comply with regulatory obligations (e.g., Anti-Money Laundering/Counter-Terrorism Financing Act 2006).

6. Use and Disclosure of Personal Information

6.1 Use

DFM collects personal information for the following purposes:

- To administer and manage retail managed investment schemes
- To communicate with investors and provide information about their investments
- To meet legal and regulatory obligations, including reporting to government agencies (such as the Australian Taxation Office)
- To enhance customer service and improve business processes.

6.2 Disclosure

DFM may disclose personal information to third parties in limited circumstances, including:

- Service providers (such as fund administrators, auditors, and legal advisers) who assist DFM in performing its functions
- Regulatory bodies such as ASIC or the ATO where required by law
- Other parties with the individual's consent or as required by law.

DFM will not disclose personal information for marketing purposes without obtaining explicit consent from the individual.

7. Storage and Security of Personal Information

DFM takes reasonable steps to ensure that personal information is securely stored, protected from misuse, loss, unauthorized access, modification, or disclosure. Security measures include:

- Physical security of documents
- Secure electronic storage systems
- Access controls and password protections for sensitive data.

Personal information will be retained only for as long as necessary to fulfill the purposes outlined in this policy or as required by law.

8. Access to and Correction of Personal Information

8.1 Access

You have the right to request access to your personal information held by DFM. Requests should be made in writing as per contact details in Section 11 below. DFM will respond to requests within a reasonable time and may charge a fee for providing access to personal information.

8.2 Correction

If you believe that your personal information held by DFM is inaccurate, incomplete, or out-of-date, you may request that the information be corrected. DFM will take reasonable steps to ensure that any corrections are made promptly.

9. Privacy Complaints

If you have any concerns or complaints regarding the handling of your personal information, you should contact DFM as per Section 11 below. DFM will investigate all complaints thoroughly and respond to you in a timely manner.

If you are not satisfied with DFM's response, you can approach one of the following free and independent dispute resolution services.

Australian Financial Complaints Authority
GPO Box 3
Melbourne VIC 3001

Ph: 1800 931 678 (free call)
E: info@afca.org.au
W: www.afca.org.au

Office of the Australian Information Commissioner
GPO Box 5288
Sydney NSW 2001

Ph: 1300 363 992
E: enquiries@oiac.gov.au
W: www.oaic.gov.au

10. Updates to the Privacy Policy

DFM may update this Privacy Policy from time to time to reflect changes in legislation or operational practices. Any updates will be posted on the DFM website and made available upon request.

11. Contact Information

For any questions or concerns regarding this Privacy Policy or the handling of personal information, please contact:

Robert Henman
Compliance Officer
Diogenes Funds Management Ltd

Ph: 07 3473 0176
E: info@diogenesfm.com.au
W: www.diogenesfm.com.au
