

## La Trobe Financial's Privacy & Credit Reporting Policy

In this policy, 'we', 'us' and 'our' refers to La Trobe Financial Services Pty Limited ACN 006 479 527 and La Trobe Financial Asset Management Limited ACN 007 332 363 as responsible entity / trustee of each of the managed funds identified on our website (each a **Fund**), and our related bodies corporate.

### Our commitment to protect your privacy

We understand how important it is to protect your personal information. This policy sets out our commitment to you in respect of personal information we hold about you and what we do with that information.

We will only use personal information we collect about you for the purposes we have collected it for, or as allowed under the law. It is important to us that you are confident that we will treat any personal information we hold about you in a way which ensures protection of your personal information.

Our commitment in respect of personal information is to abide by the Australian Privacy Principles for the protection of personal information, as set out in the Privacy Act 1988 (Cth) (**Privacy Act**) and any other relevant law, including the Privacy (Credit Reporting) Code 2025 (**Credit Reporting Code**) issued by the Office of the Australian Information Commissioner (**OAIC**) to the extent we are required to comply with it.

### What information do we collect?

When we refer to **personal information** we mean information that identifies you or information from which your identity is reasonably apparent. This information may include information or an opinion about you, whether true or not. The personal information we hold about you may also include credit information.

**Credit information** is any information that has any bearing on your credit worthiness, and which is or could be used to assess your eligibility to be provided with finance. This may include any finance that you have outstanding, your repayment history and any defaults. It may also include certain credit worthiness information that we derive from the data that we receive from a credit reporting body (**CRB**). Usually, credit information is exchanged between credit and finance providers and CRBs.

**Sensitive information** is personal information that includes information relating to your racial or ethnic origin, political persuasion, religious or philosophical beliefs, memberships in trade or professional association or trade unions, sexual preferences, criminal record, or health.

### Examples of the types of personal and sensitive information we collect & why

The types of personal and sensitive information we may collect about you and the reason for collecting this information are set out below:

Type of personal or sensitive information and examples	Reasons for collection
<b>Personal and contact details</b> (name / date and place of birth / current and former addresses (including length of time at the current address) / phone number)	<ul style="list-style-type: none"><li>To verify your identity and conduct checks required by law;</li><li>To conduct direct marketing and social and event management functions;</li><li>To offer you other product or services;</li><li>To contact candidates for the purposes of recruitment;</li></ul>

	<ul style="list-style-type: none"> <li>For analytics, market research and product development to obtain insights about customer preferences and requirements, developing target markets for our products and services and tailoring our products and services to improve the customer experience.</li> </ul>
<b>Australian Government or foreign government related identifiers</b> (passport, drivers' licence, tax file number, Medicare card and Director Identification Number)	<ul style="list-style-type: none"> <li>To verify your identity and to conduct checks required by law. If we collect Government identifiers, such as your tax file number, we do not use or disclose this information other than as required by law.</li> </ul>
<b>Financial information</b> (details of your employment, income, expenses, assets / liabilities and bank statements)	<ul style="list-style-type: none"> <li>For the purposes of assessing your application for finance;</li> <li>When collected in respect of a hardship application, this is for the purpose of assessing financial position, repayment capacity, and eligibility for hardship assistance.</li> </ul>
<b>Nature of Business</b> (details of your business activities)	<ul style="list-style-type: none"> <li>For the purpose of understanding your business activities, assessing and managing risk, and complying with our legal and regulatory obligations.</li> </ul>
<b>Purpose of Obtaining Product</b> (reason or objective for obtaining the product)	<ul style="list-style-type: none"> <li>For the purpose of understanding why our products are being used and to comply with our legal and regulatory obligations.</li> </ul>
<b>Credit information</b> (credit liability information being information about your existing finance which includes the name of the credit provider, whether the credit provider holds a licence, the type of finance, the day the finance was entered into, the terms of the finance, the maximum amount of finance available, and the day on which the finance was terminated, repayment history information, default and payment information and court proceedings information)	<ul style="list-style-type: none"> <li>For the purposes of assessing your application for finance.</li> </ul>
<b>Socio-demographic information</b> (marital status, citizenship/residency status, number and age of dependants)	<ul style="list-style-type: none"> <li>For the purposes of assessing your application to become a member of a fund and/or your application for finance;</li> <li>To determine tax residency, and meet Anti Money Laundering and Counter Terrorism Financing (AML/ regulatory obligations).</li> </ul>
<b>Employment information</b> (occupation, employment history, qualifications, criminal & bankruptcy events)	<ul style="list-style-type: none"> <li>Throughout the duration of the recruitment process including conducting suitability</li> </ul>

	assessments and undertaking reference checks.
<b>Transaction and banking information</b> (bank account numbers, mortgage or investor identifiers, online login credentials & passwords for LTF portals)	<ul style="list-style-type: none"> <li>To provide you with financial and/or credit services.</li> </ul>
<b>Sensitive information</b> (health information such as details of injury, illnesses, significant life events, family and domestic violence or where you have been impacted by a natural disaster)	<ul style="list-style-type: none"> <li>To assess financial position, repayment capacity, and eligibility for hardship assistance.</li> <li>We will only collect sensitive information about you with your consent (for example, when assessing a hardship application).</li> </ul>
<b>Call recordings</b>	<ul style="list-style-type: none"> <li>For monitoring and staff training across various teams and business functions.</li> </ul>

### **If you have applied to invest in our funds**

If you have applied to invest in the La Trobe US Private Credit Fund or the La Trobe Private Credit Fund your personal information has been collected by LAB Group Services Pty Ltd ABN 61 168 489 414 for the purpose of processing your application including conducting verification of identity services on our behalf. Find a copy of LAB Group's Privacy Policy [here](#).

### **If you have applied to work at La Trobe Financial**

If you have applied for a position at La Trobe Financial, the following personal information is collected both directly from applicants and indirectly via recruitment consultants:

- Employment history used to assess experience and role suitability;
- Qualifications used to verify credentials and match role requirements; and
- Contact details used for communication throughout the recruitment process.

### **How we collect your personal information**

Where reasonable and practical, we will collect your personal information directly from you. For example, when you submit your personal information through our website, by email or mail, in person or by phone.

We also collect your personal information from Credit Reporting Bodies (**CRBs**) and from third party professionals such as finance brokers, financial advisers, accountants and lawyers.

If we are engaging in recruitment activities, we may collect information about you from recruiters, labour hire agencies and personal / professional referees. We may also use online platforms including LinkedIn and Seek.

We may also collect information about you using public registers or using information available to the public online.

### **Notification of collection**

Generally, we will notify you that we are collecting your personal information (and seek your consent) at the point in time that you become our customer. We may notify you again in other circumstances under which we seek personal or sensitive information (such as to assess your application for hardship).

## Consent to collect sensitive information

We will only collect sensitive information if the person to whom it relates consents to the collection and the information is reasonably necessary for one or more of our functions or activities, except where the collection is required or authorised by the law, is necessary to prevent or lessen a serious and imminent threat to the person's (or another person's) life or health or is necessary in relation to legal proceedings (current, anticipated or potential), or another permitted exception in the Privacy Act applies.

## Who we may disclose your personal information to

We may disclose your personal information to other organisations that provide products or services used or marketed by us.

The types of organisations which we are likely to disclose information about you include other mortgage intermediaries, lenders, valuers, lenders mortgage insurers, surveyors, accountants, CRBs, recoveries firms, debt collectors product issuers, investment managers, auditors, business consultants, data processors, information brokers, marketers, researchers, investigators and lawyers.

We may also disclose your personal information to any other organisation that may have or is considering having an interest in your finance, or in our business.

Prior to disclosing any of your personal information to another person or organisation, we will take all reasonable steps to satisfy ourselves that:

- the person or organisation has a commitment to protecting your personal information at least equal to our commitment; or
- you have consented to us making the disclosure.

Depending on the product or service you have requested, we may disclose your personal information to:

- prospective funders or other intermediaries in relation to your finance requirements;
- other organisations that are involved in managing or administering your finance such as third-party suppliers, printing and postal services, call centres, lenders mortgage insurers, trade insurers and CRBs;
- associated businesses that may want to market products to you (including any sponsorship or loyalty program partners);
- companies that provide services to us, including companies that provide us with information and infrastructure systems;
- our unit registry service providers, Automic Pty Ltd ABN 27 152 260 814;
- anybody who represents you, such as finance brokers, lawyers, and accountants;
- anyone, where you have provided us consent;
- an organisation providing verification of your identity, including on-line verification of your identity and any issuing or legal authority;
- investors and potential investors, agents or advisers, or any entity that has an interest in our business;
- data aggregators which collate and report information between us and our business partners and/or you;
- our Authorised Representatives (representatives who sell products and services on our behalf);
- financial institutions including stockbrokers, custodians, fund managers, portfolio service providers or other entities that administer your financial products;
- insurers, if you obtain insurance through us;
- any industry body, tribunal, court or otherwise in connection with any complaint;

- any person where we are required by law to do so, such as under the Anti-Money Laundering and Counter Terrorism Financing Act 2006 (Cth), Insurance Contracts Act 1984 (Cth) or the National Consumer Credit Protection Act 2009 (Cth); or
- your employer or referees.

### **Overseas disclosure**

We may disclose your credit information and other personal information to overseas entities that provide support functions to us. These entities have offices and data centres located in the following countries:

- Canada
- United States
- Ireland
- Denmark
- Asia (including India, Sri Lanka, Malaysia, Singapore and Japan)

Some of our service providers may utilise Amazon Web Services (AWS) which is a highly secure and reliable data centre.

You may obtain more information about these entities by contacting us.

### **Credit Reporting - Statement of notifiable matters**

The law requires us to advise you of 'notifiable matters' in relation to how we may use your credit information. Please [click here](#) to download a PDF copy of this policy.

If we seek information about you from a CRB in connection with an application for finance made by you (known as a 'credit enquiry'), your consent to the credit enquiry is not required. A record of the credit enquiry may be used and, as relevant, disclosed for the purposes of the CRB or a credit provider assessing your credit worthiness, including calculation of a credit score or credit rating (subject to any other use or disclosure limitations under the Privacy Act, the Privacy Regulations or the Credit Reporting Code).

Credit enquiries on your credit report may impact your credit score or credit rating (for example, if multiple credit enquiries have been recorded over a short period of time, that may lower your credit score). The impact on your credit score or credit rating will depend on the type and amount of finance you apply for, the frequency of credit enquiries and your credit history.

We may verify your identity using information held by a CRB. To do this we may disclose personal information such as your name, date of birth, and address to the CRB to obtain an assessment of whether that personal information matches information held by the CRB. The CRB may give us a report on that assessment and to do so may use personal information about you and other individuals in their files. Alternative means of verifying your identity are available on request. If we are unable to verify your identity using information held by a CRB, we will provide you with a notice to this effect and give you the opportunity to contact the CRB to update your information held by them.

We exchange your credit information with CRBs. We use the credit information that we exchange with the CRBs to assess your credit worthiness, assess your application for finance and in managing your finance. These CRBs may also include the information we provide them in reports to other credit providers to assist them to assess your credit worthiness.

Sometimes your credit information will be used by CRBs for the purposes of 'pre-screening' credit offers on the request of other credit providers. You can contact the CRB directly at any time to request that your credit information is not used in this way.

The credit information we collect about you may be exchanged with CRBs and other entities for the purposes of assessing your application for finance and managing that finance.

When we obtain credit information from a CRB about you, we may also seek publicly available information and information about any serious credit events.

If you have applied for finance, we may verify any document that you have provided by sending it to the issuer for verification.

If you fail to meet your payment obligations in relation to any finance that we have provided or arranged or you have committed a serious credit infringement, then we may disclose this information to a CRB.

You have the right to request access to the credit information that we hold about you and make a request for us to correct that credit information if needed. Please see the heading **Access to and correction of your personal and credit information**, below. You also have the right to make a complaint. Please see the heading **Complaints**, below. We may disclose your credit information or credit eligibility information to overseas entities (see list under **Overseas disclosure** above).

If you believe that you have been, or are likely to be, a victim of fraud, you have a right to ask a CRB not to use or disclose your credit information. You can contact any of the following CRBs for more information:

- Equifax  
www.equifax.com.au  
T: 13 8332
- Illion Australia  
www.illion.com.au  
T: 1300 734 806  
E: pac.austral@illion.com.au
- Experian  
www.experian.com.au  
T: 1300 783 684  
E: creditreport@au.experian.com

CRBs are required to have a policy which explains how they will manage your credit information. You can find the policy for each CRB that we deal with at the links above.

### Direct marketing to you

We may use your personal information to provide you with current information about finance, offers you may find of interest, changes to our organisation, or new products or services being offered by us or any company we are associated with.

If you do not wish to receive marketing information, you may at any time decline to receive such information by telephoning us on 13 80 10 or by writing to us at either:

- marketing@latrobefinancial.com.au; or
- GPO Box 2289, Melbourne, VIC, 3001

If the direct marketing is by email you may also use the unsubscribe function. We will not charge you for giving effect to your request and will take all reasonable steps to meet your request at the earliest possible opportunity.

## Eligible Data Breaches

We will notify individuals and the OAIC about 'eligible data breaches' as required by law. An 'eligible data breach' is a breach that is likely to result in serious harm to any of the individuals to whom the information relates, and we have not been able to prevent this risk of serious harm with remedial action.

## Cookies

For all visitors to our website, we use cookies and other web browser technologies to collect information such as the server your computer is logged on to, your browser type, and your IP address. We may also derive the location associated with an IP address.

Once you have logged into any of our portals or applications, accessed our website from an e-mail or other personalised communication sent to you, or provided us with personal information by completing a form online, we may be able to identify you and we may combine that with other information in order to provide you with a better online experience. If you would prefer not to be identified, you can delete the cookies and reconfigure the cookie preferences on your internet browser (see below).

A 'cookie' is small file stored by the web browser software on your computer when you access our website. An explanation of cookies can be found on the OAIC's website.

Cookies are generally used on our websites to:

- access online services – if you log into our secure areas on our website, we will use cookies to authorise your access and save your preferences;
- manage advertising – when you see one of our ads on a third-party website, cookies are sometimes used to collect anonymous information about the page you visit and the type of software you are using;
- monitor traffic – we use anonymous information to track how people are using our website. This may include time of visit, pages visited and some system information about the type of computer you are using;
- monitor your use of our website – if we have identified you as a result of you logging into one of our portals, accessing our website from a personalised communication or providing us with personal information by completing a form online, we may use cookies to collect personal information about you.

You can also configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent – each browser is different, so check the Help menu of your browser to learn how to change your cookie preferences.

If you disable the use of cookies when you first visit our website or at any point on your web browser or remove or reject specific cookies from our websites or linked sites, then you may not be able to gain access to all of the content and facilities on our websites.

## Updating your personal information

It is important to us that the personal information we hold about you is accurate and up to date. During the course of our relationship with you we may ask you to inform us if any of your personal information has changed.

If you wish to make any changes to your personal information, you may contact us. We will generally rely on you to ensure that information we hold about you is accurate and complete.

## Access to and correction of your personal and credit information

We will provide you with access to the personal and credit information we hold about you. You may request access to any of the personal information we hold about you at any time by contacting the Manager of our Customer Service team on 13 80 10 or at either:

- customerservices@latrobefinancial.com.au; or
- GPO Box 2289, Melbourne, VIC, 3001

Depending on the type of request that you make, we may respond to your request immediately, otherwise we usually respond to your request to access personal information within 21 days of receiving your request. We may need to contact other entities to properly investigate your request. If you make a request to access or correct credit information which was reported to a CRB, we will respond to you within 7 days.

There may be situations where we are not required to provide you with access to your personal or credit information, for example, if the information relates to existing or anticipated legal proceeding. An explanation will be provided to you if we deny you access to the personal or credit information we hold about you, to the extent permitted by law.

If any of the personal or credit information we hold about you is incorrect, inaccurate or out of date you may request that we correct the information. If appropriate, we will correct the personal information at the time of the request, otherwise, we will provide an initial response to you within seven days of receiving your request. Where reasonable, and after our investigation, we will provide you with details about whether we have corrected the personal or credit information within 30 days.

We may need to consult with other finance providers, CRBs or entities as part of our investigation.

If we refuse to correct personal or credit information we will provide you with our reasons for not correcting the information.

We will not charge a fee for making a request to access the personal information we hold about you or for making any corrections to personal information. However, in certain circumstances we may require you to meet our reasonable costs in providing you with access to your personal information, for example if the information requested is voluminous or we incur third party costs in providing you access to your personal information.

## Business without identifying you

In most circumstances it will be necessary for us to identify you in order to successfully do business with you. However, where it is lawful and practicable to do so, we will offer you the opportunity of doing business with us without providing us with personal information, for example, if you make general inquiries about interest rates or current promotional offers.

## Unsolicited personal information

In some limited instances we may collect personal information from you which is unsolicited. To the extent reasonable, we will delete or de-identify any unsolicited personal information.

## How we store your personal information

We may store your personal information (including credit information) in paper and electronic form. We may store personal information we hold about you in electronic form on our secure servers, or we may use third party cloud storage providers. The cloud storage and the IT servers may be located inside or outside Australia.

We will take reasonable steps to protect your personal information by storing it in a secure environment. We will also take reasonable steps to protect any personal information from misuse,

loss and unauthorised access, modification or disclosure, including through technical and organisational measures. For example, we use physical security measures (such as controlling access to our buildings) and restrict access to electronic records on a “need to know” basis. We also require our employees to comply with our information security policies, and to complete training on information security.

Where permitted by law, we will also take reasonable steps to destroy or de-identify personal information once we no longer require it for the purposes for which it was collected or for any secondary purpose permitted under the APPs.

## Complaints

If you are dissatisfied with how we have dealt with your personal information, or you have a complaint about our compliance with the Privacy Act and the Credit Reporting Code, you may contact our Customer Resolution team on 13 80 10 or by writing to us at either:

- [customerresolution@latrobefinancial.com.au](mailto:customerresolution@latrobefinancial.com.au); or
- GPO Box 2289, Melbourne, VIC, 3001

We will acknowledge your complaint within one business day. We will provide you with a decision on your complaint within 21 days.

You can also make a complaint to our External Dispute Resolution bodies:

- **Australian Financial Complaints Authority (AFCA)**  
Phone: 1800 931 678 (free call)  
In writing to: AFCA, GPO Box 3, Melbourne, VIC, 3001  
Email: [info@afca.org.au](mailto:info@afca.org.au)  
Website: [www.afca.org.au](http://www.afca.org.au); or
- **The Office of the Australian Information Commissioner:**  
Phone: 1300 363 992  
In writing: GPO Box 5218, Sydney NSW 2001  
Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)  
Website: [www.oaic.gov.au](http://www.oaic.gov.au)

## Change in our privacy and credit reporting policy

We are constantly reviewing all of our policies and attempt to keep up to date with market expectations. Technology is constantly changing, as is the law and market place practices.

As a consequence we may change this privacy and credit reporting policy from time to time or as the need arises. When we do, we will post the updated privacy and credit reporting policy on our website.

You may request this privacy and credit reporting policy in an alternative form free of charge.

This privacy and credit reporting policy was updated on 21 April 2026.

## Further information

You may request further information about the way we manage your personal or credit information by contacting us.