Privacy Policy

How we collect, use, protect and share your personal information

About this policy

Oxford Capital Pty Ltd (ABN 26 700 065 872) (**Oxford**, **we**, **us**) is the investment manager of the Oxford Capital Private Credit Fund (**Fund**). We are a Corporate Authorised Representative (No. 1323556) of Non Correlated Advisors Pty Ltd (ABN 61 158 314 982, AFSL 430126) (**Licensee**).

This policy explains how we manage personal information, meaning information or an opinion about an identified or reasonably identifiable individual. We handle it in line with the *Privacy Act 1988* (Cth) (**Privacy Act**), the Australian Privacy Principles (**APPs**) and, for credit information, Part IIIA of the Privacy Act and the Privacy (Credit Reporting) Code.

The Fund's trustee, Non Correlated Capital Pty Ltd (ABN 99 143 882 562, AFSL 499882) (**Trustee**), and administrator, A4 Funds Pty Ltd (ABN 73 631 039 999) (**Administrator**), handle investor information under their own privacy policies, available at **noncorrelatedgroup.com**.

Whose information we collect

We collect personal information about:

- investors and prospective investors, and people connected to investing entities, such as directors, trustees, beneficial owners and authorised signatories
- accountants and other professionals who confirm an investor's wholesale client status
- borrowers, guarantors and security providers, and the directors, shareholders and beneficial owners of borrowing entities
- advisers, brokers, referrers, valuers, solicitors and service providers, and their staff
- people who visit our website, contact us or apply to work with us.

What information we collect

The information we collect depends on how you deal with us. It may include:

Identity and contact	Name, date of birth, addresses, email, phone, occupation, nationality, signature and copies of identification documents such as a passport or driver licence.
Wholesale client status	Information confirming you are a wholesale client under sections 761G and 761GA of the *Corporations Act 2001* (Cth), such as an accountant's certificate, net assets, gross income, investment amount or professional investor status.
Financial and tax	Bank account details, tax file number (TFN), tax residency, and source of funds and wealth.
Investment	Holdings, applications, redemptions, distributions and communications with us.
Screening	Identity verification results and checks against sanctions, politically exposed person (PEP) and adverse media lists.
Borrowers and guarantors	Financial position, assets and liabilities, business information, property and security details, and credit information (see Credit information below).

Website	IP address, browser and device type, pages visited and other technical information collected through cookies and analytics tools.

Sensitive information. We do not usually collect sensitive information, such as health information or criminal records. If we need it, for example for anti-money laundering checks or to assess a loan, we only collect it with your consent or where the law requires or allows it.

Tax file numbers. We only collect, use and disclose TFNs as permitted by tax law and the *Privacy (Tax File Number) Rule 2015*. You do not have to provide your TFN, but if you do not, tax may be withheld from distributions at the highest marginal rate.

How we collect and hold it

We collect most information directly from you, through application forms, identification documents, emails, calls, meetings and our website. We also collect it from the Trustee and Administrator, your accountant, adviser or other representative, referrers and brokers, identity verification and screening providers, credit reporting bodies, valuers, other lenders, and public registers such as ASIC, land titles, the Personal Property Securities Register and the National Personal Insolvency Index. When we collect information from someone else, we take reasonable steps to make sure you are aware of it. If we receive information we did not ask for and could not have collected, we destroy or de-identify it where lawful and reasonable.

We hold information electronically in secure cloud-based systems, including our email, document storage and client relationship management systems, and systems operated by the Trustee and Administrator. Our team works remotely, with no physical office. We keep paper records to a minimum, scanning any we receive and storing or destroying the originals securely.

Dealing with us anonymously. You can make a general enquiry without identifying yourself or by using a pseudonym. We cannot accept an investment or assess a loan on that basis, because the law requires us to identify and verify the people we deal with.

Why we collect, use and disclose it

We collect, use and disclose personal information to:

- respond to enquiries and provide information about the Fund
- confirm wholesale client status before accepting an investment, and keep it under review
- process applications, and administer and report on investments with the Trustee and Administrator
- identify and verify investors, borrowers and guarantors, and meet anti-money laundering and counter-terrorism financing (AML/CTF) and sanctions obligations
- assess, approve, document, manage and recover the Fund's loans
- manage risk, conflicts of interest, complaints and disputes, and prevent fraud
- meet our obligations under the Corporations Act, the AML/CTF Act, tax laws (including FATCA and the Common Reporting Standard) and our agreement with our Licensee
- keep you informed about the Fund and other investment opportunities, and improve our business.

We only use or disclose information for another purpose if you consent, if you would reasonably expect it and it is related to the original purpose, or if the law requires or allows it. If you do not give us the information we ask for, we may not be able to accept your investment, assess a loan or provide our services.

Who we share it with

We may disclose personal information to:

Trustee and Administrator	To process and administer investments and meet their legal obligations.
Our Licensee	For compliance monitoring, audit, complaints handling and supervision of our authorisation.

Service providers	IT, cloud hosting, email, client relationship management, electronic signing, identity verification and screening providers.
Professional advisers	Lawyers, auditors, accountants and compliance consultants.
Loan parties	Valuers, solicitors, credit reporting bodies and insurers involved in assessing, managing or enforcing loans.
Your representatives	Your accountant, adviser or another person you have authorised.
Regulators	ASIC, AUSTRAC, the ATO, courts and other bodies, where the law requires or allows it.
Business sale	A prospective buyer under confidentiality arrangements, and the buyer if a sale proceeds. We will tell you if your information is transferred.

Our service providers must protect personal information and use it only to provide their services to us. We do not sell or rent personal information.

Disclosure outside Australia

We are likely to disclose some personal information overseas, mainly because some of our service providers, such as cloud software, email and data storage providers, store or process it outside Australia. The countries involved include the United States and may include other countries where those providers operate. We may also disclose information overseas where you or your representative are based outside Australia. Before doing so, we take reasonable steps to make sure the recipient handles the information consistently with the APPs.

Credit information

This section is our credit reporting policy. It applies when we handle credit information about individual borrowers, guarantors and security providers in connection with the Fund's loans.

What we collect	Identification information; information about credit applied for, held or guaranteed; default information; court proceedings and personal insolvency information; and publicly available information about creditworthiness.
What we derive	Credit eligibility information, being information from credit reporting bodies and our own assessments based on it, such as credit scores.
How we collect and hold it	From you, from credit reporting bodies with your consent, from other lenders and from public registers. We hold it in the secure systems described above.
Why we use it	To assess a loan or proposed guarantee, manage the loan, collect overdue payments, enforce security and meet our legal obligations.
Disclosure	Only as permitted by Part IIIA and the Credit Reporting Code. We do not intend to disclose credit eligibility information outside Australia.
Access, correction and complaints	As set out below. For credit-related complaints we will acknowledge your complaint within 7 days and give you our decision within 30 days, consulting the relevant credit reporting body or credit provider if needed.

When we collect your information, we will tell you the name and contact details of any credit reporting body we use. Each has a policy explaining how it manages credit information. You can ask a credit reporting body not to use your information to pre-screen you for direct marketing, or not to use or disclose it if you believe you are, or are likely to be, a victim of fraud.

Direct marketing

We may send you Fund updates, investor communications, event invitations and information about other investment opportunities. We only market investment opportunities to wholesale clients. You can opt out at any time by using the unsubscribe link in our emails or by contacting us, at no cost. You can also ask us where we obtained your information. We do not share your information with other organisations for their own marketing.

Our website and cookies

Our website uses cookies and analytics tools to understand how visitors use it and to improve it. This information is generally not used to identify you. You can set your browser to refuse cookies, although some parts of the site may not work as intended. Our website may link to other websites, which have their own privacy policies.

Automated decisions

We use computer programs for some steps that relate directly to decisions that could significantly affect you. These steps are electronic identity verification, screening against sanctions, PEP and adverse media lists, and, for loans, credit scoring by credit reporting bodies. They use information such as your name, date of birth, address, nationality, identification document details and credit information. No decision is made solely by a computer program. A member of our team reviews the results and makes every decision about accepting an investment or approving a loan.

Security and retention

We take reasonable steps to protect personal information from misuse, interference and loss, and from unauthorised access, change or disclosure. Our safeguards include access-controlled cloud systems with multi-factor authentication, encryption of devices and data in transit, access limited to people who need it, confidentiality obligations for our people and service providers, and regular training under our IT and Cyber Security Policy.

We keep records for as long as we need them for the purposes in this policy and to meet our legal obligations, generally at least seven years after our relationship with you ends. We then securely destroy or de-identify the information.

Data breaches

If a data breach is likely to result in serious harm to anyone whose information is involved, we will notify the affected people and the Office of the Australian Information Commissioner (**OAIC**) under the Notifiable Data Breaches scheme. We will also notify our Licensee and the Trustee.

Access and correction

You can ask to access the personal information we hold about you by contacting us. We will verify your identity and respond within 30 days. There is no charge to make a request, but if giving access involves significant time or cost we may charge a reasonable fee, and we will tell you the amount first. The law allows us to refuse or limit access in some cases, for example where it would affect another person's privacy or reveal commercially sensitive information. If we refuse, we will tell you why in writing and how you can complain.

If you think information we hold is inaccurate, out of date, incomplete, irrelevant or misleading, please ask us to correct it. There is no charge, and we will respond within 30 days. If we do not agree, we will tell you why in writing, and you can ask us to attach a statement noting your view.

Making a complaint

If you are concerned that we have not handled your personal information in line with the APPs, Part IIIA or this policy, please contact us using the details below. We will acknowledge your complaint within one business day, investigate it fairly, keep you informed and give you a written response within 30 days. If you are not satisfied with our response, you can contact the OAIC on 1300 363 992, at **www.oaic.gov.au**, or at GPO Box 5288, Sydney NSW 2001.

Changes to this policy

We review this policy at least once a year, and whenever our practices or the law change. The current version is available at **oxfordcap.com.au**. You can ask us for a free copy in another form, such as a printed copy.

Contact us

For privacy questions, access or correction requests, opting out of marketing, or complaints, please contact:

CONTACT	Portfolio Manager
EMAIL	scott@oxfordcap.com.au
POST	Oxford Capital Pty Ltd, 6D Villiers Street, Parramatta NSW 2150
WEB	oxfordcap.com.au