

Contrarius Australia Privacy Policy 15 February 2023

Our Privacy Policy

We understand that privacy is important. Our Privacy Policy sets out how we will collect and manage your personal information according to the Privacy Act 1988 (Cth) and the Australian Privacy Principles, as applicable.

Your access to (or use of) this website and the provision of information to us (by whatever means) indicates your acceptance of our Privacy Policy and your consent for us to collect and use your personal information according to this policy. We may modify these policies from time to time without notice by publication on our website.

A reference in this Privacy Policy to "we" and/or "us" is a reference to Contrarius Investment Advisory Pty Ltd ("Contrarius Australia" or "CIAPL"), a company incorporated in Australia with ACN 618 145 449 and AFSL No. 506315. A reference to "you" or "your" is a reference to any person who views this Privacy Policy, any person who views or visits the www.contrarius.com.au website or any person who is resident in Australia and has provided information to us.

What personal information do we collect?

Personal information means any information that can identify you or is reasonably identifiable. We obtain personal information in order to provide you with our services or manage our relationship with you. This may include details such as your name, contact information, date of birth, nationality, tax file number, occupation, employer, bank details, financial information regarding the products you invest in and data required for AML/CTF purposes. We will collect personal information directly from you where it is reasonable and practicable to do so. Where we collect personal information from a third-party service provider, we will still take reasonable steps to ensure that an individual is made aware of the same key matters as set out above.

We may also collect personal information from individuals who are not our customers or clients, for example, business contact details of a company representative or authorised signatories whom we normally deal with.

Generally, we will not collect sensitive information about you (e.g. your ethnic background, political or religious beliefs or health information) unless such information is required for providing our services to you and we have received your explicit consent, or where required by law.

How is personal information collected and stored?

In most cases, we will collect personal information about you from the forms you complete (which may be electronic) in relation to your investment in a Contrarius fund, or instructions you provide verbally or in writing to our Investor Services team. We collect personal information about you when you decide to invest in a Contrarius fund through your financial adviser and there may be instances where we collect your information from a third-party service provider.

When you visit our website, we collect information about your visit, including through the use of 'cookies'. Cookies are pieces of information that a site sends to your computer when you access information on that site. Cookies do not identify individual users; however, our servers may record information about your usage, the time of your visit, its duration, the pages you visit and style settings. We may use this information and other related site information to measure your interest in the contents provided and as such to continuously respond to your needs and improve our service. For further information, please refer to the Cookie Policy.

When accessing our website, you may be redirected to other sites of interest including those of our related entities. Once you access another site, you will be subject to that site's approach to data protection and privacy.

Security of your personal information is important, so in storing such information we will take all reasonable steps to protect your personal information from loss, unauthorised access, destruction, use, modification or disclosure. This includes using a variety of physical and electronic measures, such as restricting physical access to our offices, and secure servers.

How is personal information used?

We use your personal information for the purposes for which it was collected, such as to assist you from an investor management perspective or to facilitate the processing of your application, transaction or other requests. If you do not provide us with such information, we may be unable to provide you with the assistance or service you require. Once we no longer require your personal information, we will take reasonable steps to either destroy or permanently de-identify this information.

We will not disclose your personal information except to:

 Companies within the Contrarius Group, some of which are located overseas in Bermuda, Jersey, South Africa and the United Kingdom. Personal information shared within the Contrarius Group will be strictly used for the purposes for which it was collected and will be dealt with according to the Contrarius Group Privacy Policy which can be viewed at www.contrarius.com.

- Third parties that perform processing or servicing functions or assist in client relationship management, including each Contrarius fund's unit registrar or responsible entity, or your external adviser. Certain of these, such as our electronic mail service, are located or store data overseas.
- External legal or other professional advisors retained to advise Contrarius with respect to the services provided by Contrarius. Any
 personal information provided to external advisors will be provided on a confidential basis.

We may also send you educational and direct marketing material about our products and services which may be of interest for you. If you do not wish to receive direct marketing communications from us, you can opt-out at any time by contacting us using the contact details below. If you opt-out of receiving direct-marketing material from us, we may still contact you in relation to products and services we provide to you.

Unless we have your consent or an exception under the APPs applies, we will only disclose your personal information to overseas recipients where we have taken reasonable steps to ensure that the overseas recipient does not breach the APPs in relation to your personal information.

Can personal information be given to anyone else?

We do not sell, rent or trade personal information to, or with, third parties. In some circumstances personal information may be disclosed without obtaining your consent or prior notification to you. This includes where disclosure is required by law enforcement agencies, government agencies or regulatory bodies such as AUSTRAC, ASIC or ATO, courts, or in compliance with applicable laws.

Accessing and correcting your personal information

You can access the personal information we hold about you and request changes. Your right to access your personal information is subject to certain exceptions. For example, you may be unable to access your information which would interfere with the privacy of others or which we are prevented by law from disclosing.

If you have any complaints or questions about this Privacy Policy or wish to access and/or correct your personal information, please contact us at investorservices@contrarius.com.au.

If we are not able to resolve your complaint or query with respect to this Privacy Policy and/or your personal information, please contact the Office of the Australian Information Commissioner on 1300 363 992 or at enquiries@oaic.gov.au.

Changes to Privacy Policy

From time to time, we may change this Privacy Policy. We recommend that you visit our site regularly to keep up to date with any changes.



Contrarius Australia Cookie Policy

The use of cookies

We use cookies and similar tools on our website to improve its performance and enhance user experience. Cookies are small text files which a website may put on your computer when you first visit a site or page. The cookie will help our website to recognise your device the next time you visit, thus improving your experience of our website. We use the term "cookies" in this policy to refer to all files that collect information in this way.

The Contrarius Australia website uses two types of cookies: session cookies and persistent cookies:

- Session cookies that are temporary and expire at the end of a browser session. The session cookie we use allows us to link your
 actions during a single browser session so you can use our website most efficiently.
- Persistent cookies that are stored on your equipment until deleted. An example is the cookie used to record if you have accepted
 the use of cookies on the Contrarius Australia website by continuing to browse as normal. This cookie allows you to browse the
 Contrarius Australia website in future without being shown our cookie notice.

This cookie policy applies to our website, mobile applications and emails and forms part of our Privacy Policy.

We reserve the right to update this Cookie Policy. Any changes will be posted within this page and become effective immediately. Continued use of our website constitutes your agreement to all such updates. If you require any further information about Contrarius Australia's use of cookies, please contact us at investorservices@contrarius.com.au.

Third Party Analytics

From time to time, the Contrarius Australia website may use web analytics service providers, for instance Google Analytics, to help Contrarius analyse how users use the website. Third-party cookies from Google are used in these instances which allows us to recognise, measure and track users of the website. The information collected includes the number of visitors to the website, where visitors have come to the website from and the pages they have visited. This helps us improve the way the website works, for example, by determining whether visitors can find information easily or by identifying aspects of the website that are of the most interest to them.

More information on "How Google uses data" can be found here: https://policies.google.com/technologies/partner-sites Information concerning the terms and conditions of use and data privacy can be found here: https://marketingplatform.google.com/about/analytics/terms/gb/

Blocking Cookies

You can choose to accept or decline the usage of cookies by adjusting your browser settings. Cookie settings typically are found in the 'Options' or 'Preferences' menu of your browser. You can prevent Google's collection and use of data (cookies and IP address) by downloading and installing the browser plug-in available here: https://tools.google.com/dlpage/gaoptout?hl=en-GB

However, if you decline the use or prevent the usage of cookies on your browser, you may encounter problems browsing our website.

For more information about cookies and how cookie regulation affects you, please visit:

http://ico.org.uk/for_the_public/topic_specific_guides/online/cookies