

Privacy Policy

29 July 2024

1. INTRODUCTION

At MFF Capital Investments Limited ("**MFF**" or "**we**") your privacy is important to us.

This Privacy Policy explains how we collect, hold, use, disclose and protect personal information.

2. COLLECTION AND USE OF PERSONAL INFORMATION

Personal information about you is collected and used by MFF to establish, administer and manage the administration of its issued securities. Magellan Asset Management Limited ("**MAM**") provides investment research and administrative services to MFF.

MFF uses third party service providers and your personal information is disclosed and used by these service providers. MFF uses Boardroom Pty Limited ("**Boardroom**") to perform registry services and has contractual arrangements with Boardroom to ensure that it complies with privacy laws when dealing with your personal information. A copy of Boardroom's privacy policy can be accessed through their website at www.boardroomlimited.com.au.

Personal information may also be used for secondary purposes such as for the provision of promotional and marketing material. Individuals can notify MFF at any time if they do not wish to receive such materials or information. Where MFF collects your personal information for a specific purpose not contemplated in this Privacy Policy, MFF will provide you with a collection notice which explains the primary purpose and any related secondary purposes for which your personal information is being collected.

When you visit our website, technical and navigational information, such as device type, browser type, Internet protocol address, pages visited, and average time spent, user journeys and demographics information is collected. Information is collected on an anonymous basis and used to improve the website design and functionality.

We do not actively seek to collect sensitive information (for example health information or information about any criminal record), unless it is necessary for our business purposes. If we do have to collect sensitive information, we will only collect, use and disclose it in accordance with privacy laws.

3. DISCLOSURE OF PERSONAL INFORMATION

We may disclose your personal information to persons/entities outside of MFF and MAM, including to:

- our external service providers that provide registry, custody and/or other services;
- any joint holder of an investment;
- parties authorised by you such as a licensed financial adviser, dealer group or service provider; and
- governmental or regulatory bodies and agencies (such as ASIC, ATO, AUSTRAC or a law enforcement agency).

4. ACCESSING AND CORRECTING PERSONAL INFORMATION

If you require access to, or wish to update your personal information, please contact our Privacy Officer:

Privacy Officer
MFF Capital Investments Limited
Level 36, 25 Martin Place, Sydney, New South Wales, 2000
Tel: + 61 2 9235 4888
Email: privacy@magellangroup.com.au

If you believe that the personal information we hold is inaccurate, incomplete or out-of-date, you should contact us to correct this information.

We will endeavour to promptly update any personal information that is inaccurate, incomplete or out-of-date. If we do not agree that the personal information is inaccurate, incomplete or out-of-date, we will notify you in writing of our reasons to refuse any corrections. We will also notify you of what you can do if you are not satisfied with our response.

5. PROTECTION OF PERSONAL INFORMATION

We take all reasonable steps to protect your personal information from misuse, loss, unauthorised access, interference, modification or disclosure.

We have physical, electronic and procedural safeguards to protect your information which is held by us. For example, your personal information is stored in secured office premises, and electronic databases requiring logins and passwords for access. Access to information stored electronically is restricted to staff whose job purpose requires access. We require all staff to maintain the confidentiality of customer information.

6. ELIGIBLE DATA BREACH

Our service providers are required to notify us of any unauthorised access, disclosure or loss of personal information.

In such a circumstance, MFF performs an assessment to determine if there has been an 'eligible data breach' whereby the access or disclosure of the personal information is likely to result in serious harm to the individuals to whom the information relates. If MFF determines there has been an 'eligible data breach' then the individuals affected will be notified as soon as practicable of the details of the breach and the recommended steps to take in response to it. If required, MFF will also inform the Office of the Australian Information Commissioner at the same time.

7. CONTACTING US

If you have any questions, concerns or complaints about this privacy policy or our practices relating to the handling of personal information please contact our Privacy Officer:

Privacy Officer
MFF Capital Investments Limited
Level 36, 25 Martin Place, Sydney, New South Wales, 2000 Tel: +61 2 9235 4888
Email: privacy@magellangroup.com.au

We will try to answer any questions you may have, correct any error on our part or resolve any complaint that you may have about our information handling practices. If we do not resolve a complaint to your satisfaction, you may refer the matter to the Office of the Australian Information Commissioner (see www.oaic.gov.au).

8. PERIODIC REVIEW

This Privacy Policy will be periodically reviewed by the Company Secretary. The review will occur no less than annually, or when significant regulatory change occurs.