KNOX

Privacy Policy

POLICY & PROCEDURE

Original Date of Issue: 17 September 2026

What you need to know:

This Privacy Policy and Procedure is intended to provide a summary of Knox' current approach to the handling of personal information (including credit – related information). Knox is committed to complying with the *Privacy Act 1988* (Cth) (including the Australian Privacy Principles) and *Privacy (Credit Reporting) Code 2025* (CR Code)

The Policy was approved by the Board on the date shown above and replaces any previous versions of the Policy. Also refer to the Compliance Plans for the registered managed investment schemes for additional related procedures.

Knox Funds Limited
ABN 40 145 378 383 AFSL No. 383080
Original Date of Issue: 13 December 2013
Updated: 17 September 2026

Knox Funds Limited ("**Knox**", "**We**", "**Us**" or "**Our**") is the Responsible Entity and Issuer for the following investment funds:

- Knox Fortitude Fund (ARSN 149 257 410);
- Knox Fortitude Platinum Fund (ARSN 605 008 535);
- Knox Providence Fund (ARSN 149 257 401);
- Knox Private Fund (ARSN 602 348 292);
- WGMI Wholesale Fund (ARSN 675 217 017);
- Colvin Mortgage Fund (ARSN 602 099 169); and
- Arkus Fund (ARSN 686 375 422). ('the Funds')

Knox, as Responsible Entity and Fund Manager for the Funds, together with Perpetual Corporate Trust Limited ABN 99 000 341 533 as Custodian for the Funds, also provide commercial credit to approved borrowers.

This Privacy Policy is intended to provide a summary of Knox' current approach to the handling of personal information (including credit – related information). Knox is committed to complying with the Privacy Act 1988 (Cth) (including the Australian Privacy Principles) and to abide by any other relevant law, including the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)* ("**AML/CTF Act**" and the "**AML/CTF Rules**").

Knox will provide a free copy of this policy to anyone who asks for it.

Types of information Knox collects

The kinds of personal information we collect will depend upon the purposes for which it is collected.

When an individual applies for a product or service, we will collect the information we consider is or may be necessary to enable us to assess the application, to provide the product or service, and to administer the product or service after it has been provided.

When an individual applies for investment in one of the Funds, we will collect the information necessary to record their details in the relevant Fund's register, identify them and contact them. This will include the individual's name, tax file number, address, and other contact details.

We will collect information regarding transactions conducted by investors on their accounts, to enable us to properly identify them and process those transactions and meet Our record keeping obligations.

If an individual applies for a loan, the information we collect may include information to identify the applicant, information required about the applicant's business experience, employment and employment history, residential history, assets, liabilities, income, company financial information, expenses, and credit history.

If an individual is to be a signatory on an account, we will collect the information necessary to identify the individual in accordance with Our legal obligations. This might include information such as the individuals' drivers licence number or passport details.

We may collect credit reporting information about individual loan applicants or guarantors. We always obtain written consent before doing this. The types of credit reporting information that may be provided to Knox by credit reporting bodies includes:

- identity details;
- credit history;
- commercial credit enquiries;
- consumer payment default history;
- Personal Property Security Register details; and

- Public record information such as court judgements, details of companies of which you are a director or businesses of which you are a proprietor, details of previous and disqualified directorships and bankruptcy information.

How does Knox collect and hold personal information?

We will generally collect the personal information we need about an individual directly from that individual directly whenever it is reasonable and practicable to do so (e.g. face to face, telephone or through completion of forms). We may do so when:

- an individual applies for investment in the Funds, applies for any of Our products or services or becomes a signatory on an account with us;
- an investor contacts us in relation to products or services we have supplied to that investor; or
- an individual contacts us to enquire about investing or about Our products and services.

We may also obtain personal information (including credit-related information) about an individual who is seeking credit or who has offered to be a guarantor, from third parties including:

- from a credit reporting body such as Equifax, or another credit provider, if the individual has given consent in accordance with Part IIIA of the Privacy Act 1988;
- from a finance broker or a supplier of goods or services who introduces the individual to us, if we are satisfied that the party supplying the information to us has the right to do so and has obtained any necessary consent from the individual;
- other credit providers;
- any referees an individual provides;
- other third-party services providers; and
- publicly accessible databases.

If an individual is seeking credit, we may contact the individual's employer to confirm that the employer employs the individual.

If a borrower has defaulted in repaying credit, and We have made reasonable and unsuccessful attempts to contact the borrower using their last known contact details, and there is reasonable grounds to believe that they have moved without notifying us of their new contact details, we may contact relatives or friends of the borrower to ascertain their current contact details, or we may retain an enquiry agent to attempt to locate the borrower.

We will collect information regarding the operation of an investor's account when processing transactions conducted on the account.

If an individual visits the Knox website, Our internet service provider can record certain information about that individual's visit including:

- internet address;
- domain name;
- internet service provider;
- the date and time of the visit to the website;
- the length of the session;
- the pages accessed;
- the website that referred to Our website;
- the type and version of the browser; and
- the operating system used.

This information is only used for statistical and website development purposes and does not personally identify the individual.

Knox may also collect names, email addresses and contact telephone numbers from enquiries sent using Our website.

Personal information may be disclosed to Our agents, contractors or third-party service providers who provide administrative, telecommunications or other services to us in connection with Our business. We may also disclose limited aspects of personal information to our professional advisers such as our

solicitors or auditors where this is necessary for them to properly advise us in relation to our business functions or operations.

Other entities we may disclose personal information to in the course of our business include:

- our related companies including Knox Development Finance Pty Ltd (ACN 693 837 464), GPS Development Finance Pty Ltd (ACN 081 849 274), GPS Wholesale Funds Pty Ltd (ACN 691 735 869), and Woodhead GMI Pty Ltd (ACN 617 789 143);,
- Perpetual Corporate Trust Limited ABN 99 000 341 533, as Custodian of the Funds;
- recipients of product disclosure statements, and supplementary product disclosure statements, as part of our need to comply with good disclosure principles under the *Corporations Act 2001* (Cth);
- debt collection agencies;
- regulatory bodies such as AUSTRAC, ATO, ASIC and APRA;
- government agencies, law enforcement bodies and Courts;
- other credit providers such as banks;
- referees and guarantors nominated by customers;
- authorised agents, financial advisors, lawyers, and other professional representatives nominated by customers; and
- our service providers, contractors, agents, partners, auditors, lawyers, and other professional advisors.

We may also collect personal information to comply with our obligations under the AML/CTF Act and the AML/CTF Rules, for example, when conducting client due diligence. This may include information from identification documents (such as your name, date of birth, residential address, passport or licence number, and the date of expiry of the document), details about the nature of the financial service we are providing, and information relevant to assessing money laundering or terrorism financing risk.

We may collect personal information from you directly or indirectly. Where required or authorised under the AML/CTF Act, we may collect personal information about you from third parties (for example, where we need to identify and verify beneficial owners of a client's company or a client's agent). It may be unreasonable or impracticable to collect and/or verify personal information directly from you in these circumstances.

We will only collect personal information which is reasonably necessary for our services, functions and activities, including for meeting our AML/CTF obligations. The 'reasonably necessary' test is an objective test: we will only collect personal information where a reasonable person who is properly informed would agree that the collection is necessary for our functions and activities.
If we collect government identifiers, such as your tax file number, we will not use or disclose this information other than as required or authorised by law.

In most circumstances it will be necessary for us to identify you to successfully do business with you, including meeting our client due diligence obligations under the AML/CTF Act. However, if you choose not to provide us with personal information, we may not be able to do business with you, or we may not be able to provide you with a financial service.
We may also collect personal information if required or permitted by law or professional standards, in accordance with the Privacy Act, the AML/CTF Act and the AML/CTF Rules.

We may have access to credit reporting information that has be provided to our client by credit reporting bodies includes:

a) identity details;
b) credit history;
c) commercial credit enquiries;
d) consumer payment default history;
e) Personal Property Security Register details; and
f) Public record information such as court judgements, details of companies of which you are a director or businesses of which you are a proprietor, details of previous and disqualified directorships and bankruptcy information.

Other personal information we may have access to may include an individual's name, tax file number, address, drivers licence number or passport details, their business experience,

employment and employment history, residential history, assets, liabilities, income, company financial information, expenses, and credit history.

Why does Knox need personal information?

We will not collect, hold, use, or disclose personal information unless it is necessary for one or more of our business functions or activities, including:

- to assist potential investors with queries;
- to process applications for investment in the Funds;
- to assess and action loan applications, including seeking credit reporting information from credit reporting bodies such as Equifax;
- to give investors the information to which they are entitled, under the Corporations Act 2001 (Cth) and the relevant Fund's constitution;
- to assess products and services, and to administer products and services that have been supplied;
- to comply with our legal and regulatory obligations;
- to report on credential or risk management matters;
- to detect and prevent fraud and other illegal activity;
- to help us plan and to develop our products and services available from us; and
- to give our investors, borrowers and customer's information about products and services available from us and other organisations that we think may be of interest to them.

We never sell or disclose any personal information to third parties for direct marketing by other organisations.

We never use sensitive information or credit eligibility information for direct marketing purposes without that individual's written consent.
We will not ask you to disclose sensitive information unless it is necessary to provide our services to you, or unless it is required to comply with our obligations under the AML/CTF Act. For example, information about an individual's membership of a political association may be collected where relevant to determining whether the client is a politically exposed person or subject to sanctions. However, if you elect to provide unsolicited sensitive information, it may be captured and stored if it is reasonably necessary for our functions or activities (or if otherwise permitted by law). Where we collect sensitive information for AML/CTF purposes, we may do so without your consent where the collection is required or authorised by Australian law, in accordance with the Privacy Act, the AML/CTF Act or the AML/CTF Rules.

Where we, or a third-party agent, collects or uses biometric information for identification or verification for client due diligence purposes, we will seek your consent before doing so (unless the specific collection or use of biometric information is specifically authorised or required to meet our legal obligations) and we will provide you with the relevant information about that process in our collection notice.

Credit-related information

This section provides more information about how we deal with credit-related information.
Credit reporting information is only sought by Knox with the written consent of the individual borrower or guarantor concerned.

Knox may provide the following types of credit information to credit reporting bodies with a request for credit reporting information:

- Name;
- Date of birth and sex;
- Driver's licence or other identification information;
- Current and previous addresses;
- Current and last employer; and

- The fact that the individual has applied for credit (including the type of credit and the amount of credit).

Knox may use and disclose credit information and credit eligibility information, as well other information provided by borrowers and guarantors, as follows:

- to verify identity;
- to assess an application for credit;
- for credit guarantee purposes;
- for securitisation purposes;
- for the purpose of assisting an individual to avoid defaulting with respect to any credit provided by Knox;
- to disclose to debt collectors for the purpose of collecting overdue payments;
- to provide information to an Australian mortgage insurer for a mortgage insurance purpose;
- to seek from and use or give to another Australian credit provider any information about an individual's account, credit worthiness, credit standing, credit history or credit capacity;
- to seek from and use or give to any originator, financial consultant, agent, accountant, lawyer, or other adviser acting in connection with any financing provided or proposed to be provided by Knox;
- to provide information to any person who proposes to guarantee or has guaranteed repayment of any credit provided to an individual, or who has provided property as security for any credit provided to an individual;
- to establish, provide and administer any credit facility and to perform any other internal administrative and management functions and operations directly related to the provision or management of credit;
- as required or permitted by law;
- to our related bodies corporate for any of the above purposes; and
- to people considering acquiring an interest in our business or assets.

The kinds of information Knox may derive from credit reporting information obtained from Equifax includes an opinion about your eligibility for credit.

Credit eligibility information will be held and used in accordance with Part IIIA of the Privacy Act 1988 (Cth), this policy, and the terms of the consent provided by the relevant individual.

Knox is not likely to disclose any credit information or credit eligibility information to entities that do not have an Australian link.

Government related identifiers

We do not use any government related identifiers, such as driver's licence numbers, as its own internal identifier of any individual. We will not use or disclose any government related identifiers other than in accordance with the *Privacy Act 1988* (Cth).

Data integrity and security

Knox takes all reasonable steps to ensure that all personal information it holds is accurate, complete, and up to date. To assist us with this, individuals should contact us if any of their personal information changes, or if they believe that the personal information, we have is not accurate or complete.

Knox takes all reasonable steps to protect the personal information that it holds from misuse, interference, or loss, or from unauthorised access, modification, or disclosure.

If We no longer requires personal information that it holds, subject to meeting its requirements under the AML/CTF Act, the Privacy Act and the Corporations Act, We will take such steps as are reasonable

in the circumstances to destroy the information or otherwise ensure that the information is de-identified.

Disclosure of data overseas

We are unlikely to disclose or transmit an individual's personal information to overseas recipients. In the rare circumstance where Knox is required to disclose or transmit an individual's personal information to an overseas recipient (such as a Knox third party contractor), We will ensure that all reasonable steps are taken to ensure that the oversees recipient handles that personal information in accordance with the Australian privacy laws and the AML/CTF Act.

Access and correction

Individuals can request access to their personal information held by Us (including credit–related information) by sending a written request to Our Compliance Officer at Email: info@knoxfunds.com.au. The request must identify the individual and, with reasonable particularity, the information required. We may require the application to be made using a form supplied by us for that purpose.

Knox does not impose a charge for making a request for access. However, We may charge for reasonable administrative costs incurred in providing access (including for the searching, locating, retrieving, photocopying, printing and/or posting of records, and also costs associated with the professional review of personal information being granted access to (if required)). We will inform you of any costs to be incurred beforehand.

An individual can request Us to correct or update that individual's personal information (including credit information). Knox does not impose any charge with respect to requests for correction or updates.

Before correcting or providing access to personal information in response to a request, We will require the individual's identity to be confirmed.

Requests for access or correction may be refused upon the grounds contained in the *Privacy Act 1988* (Cth). If We refuse to provide access, or to correct personal information, We will provide our reasoning for the refusal in writing.

Knox will respond to an individual's request for access as soon as reasonably practicable, taking into consideration the age, nature and amount of the information requested.

Individuals have the right to request of copy of the credit information that Equifax holds about them and to have the credit information corrected if it is inaccurate. To contact Equifax, please see www.equifax.com.au.

Notifiable Matters

We will notify individuals and the Office of the Australian Information Commissioner about 'eligible data breaches' where the breach is likely, in the viewpoint of a reasonable person in our position, to result in serious harm to any of the individuals to whom the information relates.

Data Breach Response Summary

If there are reasonable grounds to believe that the data breach constitutes an eligible data breach and induces notification obligations, the Compliance Officer and Managing Director will prepare a statement for the Australian Information Commissioner and notify affected individuals. Regard will be had for the Data Breach Crisis Communication Plan when determining how to notify affected individuals. The Marketing Manager, Compliance Officer and Managing Director may determine that it is most prudent to engage Public Relations specialists to administer Knox's communication strategy and ongoing media response.

Pursuant to requirements set out in the Privacy Act, the statement to be prepared for the Commissioner will describe:

g) The identity and contact details of the entity (Knox);

h) A description of the eligible data breach that the entity has reasonable grounds to believe has happened;

i) The kind or kinds of information concerned; and

j) Recommendations about the steps that individuals should take in response to the eligible data breach that the entity has reasonable grounds to believe has happened.

The Marketing Manager, Compliance Officer and Managing Director will refer to the following form which is designed to assist entities fulfill these criteria when preparing their statement: https://forms.business.gov.au/smartforms/landing.htm?formCode=OAIC-NDB

Knox is obliged to notify affected individuals of the contents of the statement prepared for the Commissioner. The legislation sets out three options for notifying individuals at risk of serious harm. The Compliance Officer and Managing Director will elect an appropriate option considering what is reasonably practicable in the circumstances.

Option 1 – Notify all individuals

If it is practicable, Knox will notify each of the individuals whose personal information was part of the eligible data breach. This option may be appropriate, and the simplest method, if Knox cannot reasonably assess which individuals are at risk of serious harm.

The benefit of this approach includes ensuring that all individuals who may be at risk of serious harm are notified, allowing them to consider whether they need to take any action in response to the eligible data breach.

Option 2 – Notify only those individuals at risk of serious harm

If Knox identifies that only a particular individual, or a specific subset of individuals are at risk of serious harm, and can specifically identify those individuals, if it is practicable, only those individuals will notified.

The benefits of this targeted approach include avoiding unnecessary distress to individuals who are not at risk, limiting possible notification fatigue among members of the public, and reducing administrative costs.

Option 3 – Publish notification

If neither Option 1 or 2 above is practicable, for example, if Knox does not have up-to-date contact details for individuals, then Knox will:

a) publish a copy of the statement on its website if it has one; and
b) take reasonable steps to publicise the contents of the statement to increase the likelihood that it will come to the attention of individuals at risk of harm.

Prior to doing so, Knox may engage a qualified PR consultant to assist it in actioning any breach response to minimise any reputational risk. Our current consultants are Cole Lawson Communications (ph.: (07) 3221 2220).

While the Privacy Act does not specify the amount of time that an entity must keep the statement accessible on their website, the Commissioner would generally expect that it is available for at least 6 months.

In respect of Options 1 and 2, Knox may use any method to notify individuals so long as the method is reasonable. In considering whether a particular method, or combination of methods is reasonable, Knox will consider the likelihood that the people it is notifying will become aware of, and understand the

notification. Where possible, Knox will also consider the usual medium of communication it uses to correspond with each affected individual.

In respect of Option 3, Knox will be conscious of the purpose of publishing the statement – to draw it to the attention of individuals at risk of serious harm. To that end, a reasonable step(s) when publishing an online notice might include:

a) Ensuring that the notice is prominently placed on the relevant webpage, which can be easily located by individuals and indexed by search engines;
b) Publish an announcement in the borrower/investor newsletters directing individuals to the notice; or
c) Take out a print or online advertisement in a publication or on a website considered reasonably likely to reach the individuals at risk of serious harm (this might be considered necessary where particularly serious information has been breached).

Knox will notify individuals as soon as practicable after completing the statement prepared for notifying the Commissioner. The scheme does not require that notification be given to the Commissioner before individuals at risk of serious harm. If Knox wishes to begin notifying those individuals before, or at the same time as notifying the Commissioner, it will do so.

Complaints

Any privacy related complaint (including complaints about breaches of the Privacy Act 1988 (Cth) or the CR Code) should be directed to our Compliance Officer, P. Lynn, at:

Knox Funds Limited
GPO Box 2252
BRISBANE QLD 4001
Telephone: 1800 999 109
Email: info@knoxinvest.com.au

No charge will be imposed for the making of a complaint, or for dealing with the complaint.
Any complaint made to Knox, or to an officer of Knox other than the Disputes Resolution Officer, that is related to privacy will be referred to the Dispute Resolution Officer (or if the complaint relates to the Dispute Resolution Officer, to Knox' Compliance Officer).

Knox will provide a written notice within 7 days that acknowledges the complaint and sets out how the complaint will be dealt with. Knox will also investigate the complaint. This may involve consultation with other credit providers or credit reporting bodies. Knox will, within 30 days after the date that a complaint is made, set out in writing its decision following the investigation and details of the right to refer to our external dispute resolution scheme, namely:

Australian Financial Complaints Authority ("AFCA")
Contact details are as follows:
Online: www.afca.org.au
Email: info@afca.org.au
Phone: 1800 931 678 (free call)
Hours: 9:00am – 5:00pm AEST/AEDT weekdays
Mail: Australian Financial Complaints Authority
GPO Box 3, Melbourne VIC 3001

You may also contact the Office of the Australian Information Commissioner at:
GPO Box 5218
SYDNEY NSW 2001
Telephone: 1300 363 992
Website: www.oaic.gov.au

Additional matters

This document does not create any legally enforceable rights or obligations beyond the rights and obligations created by the Privacy Act 1988 (Cth) or the CR Code. This policy may be varied from time to time.