

# Punakaiki Fund – Privacy Policy

*Punakaiki Fund Limited or our manager Lance Wiggs Capital Management Limited ("our, we or us") are committed to protecting our investors' personal information. We have created this Privacy Policy to help you understand how we collect, use and protect your information. This policy is provided for your information and doesn't limit or exclude your rights under the Privacy Act 1993.*

## Collecting your personal information

We only collect information relating to you that you have provided to us (through share applications, option applications, detail update forms and other mechanisms) or that we may have obtained from another source if you have given us permission to do so (such as electronic identity checking for the purposes of complying with the Anti-Money Laundering and Countering Financing of Terrorism Act 2009).

This information may include your name, date of birth, address, telephone numbers, email address, IRD number, Common Shareholder Number, RWT Exemption certificate, documents relating to your qualification/exemption under the Securities Act 1978 and any other information collected in relation to your shareholding in Punakaiki Fund Limited.

## Using your personal information

The information that we collect from you may be used by us for a number of purposes connected with your shareholding:

- Processing your applications to acquire, transfer or dispose of shares and options in Punakaiki Fund Limited, including meeting the requirements of the Anti-Money Laundering and Countering Financing of Terrorism Act 2009 and the Securities Act 1978;
- To administer the Punakaiki Fund Limited Share Register, including updating and correcting your details as required;
- To communicate to you as a security holder in Punakaiki Fund Limited, including providing quarterly and annual reports, updates and other information;
- To provide for your ability to attend security holder meetings (such as the Annual General Meeting), to vote on Shareholder Resolutions and otherwise provide feedback to us;
- Carrying out any activity in connection with our legal, governmental or regulatory requirement; and
- For general administrative and business purposes.

## Sharing your personal information

We do not sell, rent or otherwise make available any personal information to third parties. We do, however, outsource certain business functions to other organisations and we also have requirements to comply with certain laws and regulations. On this basis, we will only disclose your information to:

- those organisations who provide products or services to us in relation to the activities for which your information has been collected (for example, to the supplier of electronic identity verification services for the purposes of complying with the Anti-Money Laundering and Countering Financing of Terrorism Act 2009);
- persons to whom we may be required to pass your information by reason of legal, governmental or regulatory authority including law enforcement agencies and emergency services; and
- any person or organisation as authorised by the Privacy Act 1993.

It should be noted that the Share Register of Punakaiki Fund Limited is publicly available on request and will disclose your name, address and the number of shares you hold. From time to time, we may also publish aggregated information about Punakaiki Fund Limited's security holders; however we do not disclose information about individual security holders.

## **Protecting your personal information**

We will take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete, up-to-date and stored in a secure environment protected from unauthorised access, use, modification or disclosure.

## **Accessing and updating your personal information**

You have the right to know whether or not we hold any personal information about you. You also have the right to access your personal information.

You may request access to the personal information we hold about you by sending an email to: [chris@lwcm.co.nz](mailto:chris@lwcm.co.nz). Please quote your name and address and let us know what information you are seeking.

We will not be able to provide you personal information if we do not know or don't have reasonable grounds to believe it is personal information about you or if disclosing the information would involve the unwarranted disclosure of the affairs of another individual.

You can request correction or amendment of the information held by us at any time and as often as necessary by contacting us and specifying the information that you require changed. For some information changes, we will need you to complete a details update form (which we can supply to you).

For further information about New Zealand's Privacy Act 1993 and how it protects the personal information of individuals in New Zealand, see [www.privacy.org.nz](http://www.privacy.org.nz).

## **Internet use**

We make every effort to maintain the security of our internet communication; however for reasons outside of our control, security risks may still arise. Any personal information transmitted to us via the internet will therefore be at your own risk; however we will use our best efforts to ensure that any such information remains secure.

## **Changes to our Privacy Policy**

We may change this Privacy Policy from time to time.