

## SECTION A – INTRODUCTION

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### 1. INTRODUCTION

- 1.1 The information in this document details how we, Thera TFS Pty Ltd trading as Thera Capital Management (“**Thera Capital Management**”), comply with the requirements of the *Privacy Act 1988* (Cth) (“**Privacy Act**”) and the Australian Privacy Principles in protecting the personal information we hold about you.
- 1.2 Personal information is any information or opinion about you that is capable, or reasonably capable, of identifying you, whether the information or opinion is true or not and is recorded in material form or not.
- 1.3 Sensitive information includes such things as your racial or ethnic origin, political opinions or membership of political associations, religious or philosophical beliefs, membership of a professional or trade association or trade union, sexual orientation or criminal record, that is also personal information. Your health, genetic and biometric information and biometric templates are also sensitive information.
- 1.4 We will act to protect your personal and sensitive information in accordance with the Australian Privacy Principles and the Privacy Act.
- 1.5 We collect personal and/or sensitive information to provide you with the products and services you request as well as information on other products and services offered by or through us. The law requires us to collect personal and/or sensitive information.
- 1.6 Your personal and/or sensitive information may be used by us to administer our products and services, for prudential and risk management purposes and, unless you tell us otherwise, to provide you with related marketing information. We also use the information we hold to help detect and prevent illegal activity. We cooperate with police and other enforcement bodies as required or allowed by law.
- 1.7 We disclose relevant personal information to external organisations that help us provide services. These organisations are bound by confidentiality arrangements. They may include overseas organisations.
- 1.8 You can seek access to the personal information we hold about you. If the information we hold about you is inaccurate, incomplete, or outdated, please inform us so that we can correct it. If we deny access to your personal information, we will let you know why. For example, we may give an explanation of a commercially sensitive decision, or give you access to the information through a mutually agreed intermediary, rather than direct access to evaluative information connected with it.

## SECTION B – COLLECTION OF PERSONAL INFORMATION

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### 2. Why we collect your information

- 2.1 We collect personal information when it is reasonably necessary for one or more of our functions or activities. These include:
  - (a) providing customers with the products and services they request and, unless they tell us otherwise, to provide information on products and services offered by us and external product and service providers for whom we act as agent. (If you have provided us with

your email or mobile phone details, we may provide information to you electronically with respect to those products and services);

- (b) complying with our legal obligations;
- (c) monitoring and evaluating products and services;
- (d) gathering and aggregating information for statistical, prudential, actuarial and research purpose;
- (e) assisting customers with queries; and
- (f) taking measures to detect and prevent frauds.

2.2 We also collect information about you that we will use or disclose for the following purposes:

- (a) to perform our 'know your customer' compliance checks to verify your identity and other details;
- (b) to assess an application by you for credit, or your guarantor application, or the credit application of a company of which you are a director;
- (c) to assist you avoid defaulting on your credit obligations;
- (d) to enable us to develop, administer and manage our services and businesses;
- (e) to manage the products we provide, as well as your account with us;
- (f) to engage a Credit Reporting Body (**CRB**) to conduct a credit and reference check;
- (g) to assess and monitor your creditworthiness to provide credit or to provide products and services to you on credit terms;
- (h) for billing purposes and collection of debts;
- (i) to provide information to CRBs as permitted by law;
- (j) to advise credit providers of the status of your agreement with us, in circumstances where you are in default with credit providers;
- (k) to deal with complaints;
- (l) to enforce our rights when you are in breach, including debt recovery and other enforcement; and
- (m) complying with the law as authorised or as required.

### **3. Types of information we may collect and hold**

3.1 We are required by law to collect or disclose personal information about you including, but not limited to:

- (a) the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth), which may require us to collect personal information about you when verifying your identity;

- (b) the *Personal Property Securities Act 2009* (Cth), under which we may need to collect personal information about you to record a security interest on the Personal Property Register; and
- (c) any other applicable laws.

3.2 The personal and sensitive information we collect generally consists of personal information about you which we require for the purpose of providing commercial credit for business. This information may include, but is not limited to your name, current and previous addresses, date of birth, gender, marital status, occupation, account details, contact details (including telephone, facsimile and e-mail), employment information (including the name of your current employer, profession, occupation or job title), driver licence information, and credit-related information.

3.3 We also collected credit-related information about you such as your credit information, credit eligibility information, and credit provider derived information as those terms are defined in the Privacy Act. Credit-related information may include, but is not limited to, the following types of information:

- (a) credit liability information about you;
- (b) repayment history information;
- (c) a statement that an information request has been made about you by a credit provider, mortgage insurer, or trade insurer;
- (d) the type of credit and the amount of credit sought in an application;
- (e) court proceedings information about you;
- (f) personal insolvency information about you. This may include information relating to whether you are a bankrupt or subject to a debt agreement proposal or a debt agreement or a personal insolvency agreement executed by you;
- (g) new arrangement information about you, such as where a debt that you owe has been varied because it was overdue;
- (h) default information concerning a payment owed by you as a borrower or as a guarantor in connection with credit that remains overdue for more than 60 days;
- (i) payment information about you including publicly available information as to your credit worthiness; and
- (j) an opinion by a credit provider that you have committed a serious credit infringement in relation to consumer credit provided by the credit provider to you.

3.4 Other types of information that we may collect about you include property addresses, title searches, and financial information (such as bank account details, credit card details, and GST numbers).

3.5 We may also collect the personal information that you provide to us directly through our websites or indirectly through the use of our websites, or through our customer representatives or customer surveys. This information may include information collected through the use of

cookies to allow us to recognise your computer and provide you with content tailored for you without requiring you to register. The cookies also allow us to keep track of the products or services that you view on our websites so that we can send you, with your consent, news about these products or services. We also use cookies to provide us information about users' habits so we can improve our websites and enhance your interactions with these websites. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them.

- 3.6 We may log IP addresses (that is, the electronic addresses of computers connected to the internet) to analyse trends, administer the website, track users' movements, and gather broad demographic information.
- 3.7 If you apply for credit, we may also obtain information from CRBs and other credit providers or from your nominated references regarding your creditworthiness. If we obtain information about you from a CRB, we may derive information from the information we obtain from a CRB that has a bearing on your creditworthiness or could be used in establishing your eligibility for credit. This may include information such as credit scores and assessments which we generate from the information that we receive.
- 3.8 If there is another applicant named in a credit application, you may need to provide their personal information, and you warrant that the other applicant has consented to the collection of their personal information and has authorised you to provide it for the purposes for which it is being collected.
- 3.9 If you do not provide the information sought we may be unable to process your application, a guarantor's application or the company's application, or we may be limited in the other services we can offer you or the company.
- 3.10 Where it is necessary to do so, we also collect information on individuals such as:
  - (a) trustees;
  - (b) partners;
  - (c) company directors and officers;
  - (d) officers of co-operatives and associations;
  - (e) customer's agents;
  - (f) beneficial owners of a client; and
  - (g) persons dealing with us on a "one-off" basis.
- 3.11 We may take steps to verify the information we collect; for example, a birth certificate provided as identification may be verified with records held by the Registry of Births, Deaths and Marriages to protect against impersonation, or we may verify with an employer that employment and remuneration information provided in an application for credit is accurate.

#### **4. How we collect the information**

- 4.1 We only collect personal information about you directly from you (rather than someone else) unless it is unreasonable or impracticable to do so or you have instructed us to liaise with

someone else.

4.2 We may also collect your personal information, credit information, and credit eligibility information from:

- (a) businesses that provide information about the commercial creditworthiness of persons, and credit reporting bodies;
- (b) any authorised persons as set out in your Privacy Declaration in your application; and
- (c) any third parties with information which we need to determine whether to offer you credit, products or services, or whether to accept you as a guarantor.

4.3 The third parties that we may collect information from include:

- (a) your co-applicant (with your consent);
- (b) your employers, your accountant, banks, landlords, guarantors, financial advisers, or government authorities with whom you have had dealings;
- (c) publicly available sources;
- (d) a CRB;
- (e) an identification services provider; and
- (f) other credit providers.

4.4 If we collect credit information or credit eligibility information about you from a third party, such as a credit reporting body, credit provider, your employees or a publicly available source we will give you a notice about the collection at or before the time of collection, or as soon as practicable afterwards.

4.5 We may collect credit information, credit eligibility information and other personal information about you from the following third parties:

- (a) Equifax Australia Information Services and Solutions Pty Limited (ABN 26 000 602 862) a CRB. You can contact Equifax at <https://www.equifax.com.au/> or <https://www.equifax.com.au/contact>;
- (b) Experian Australia Operations Pty Ltd ABN 95 006 399 677 (former name Illion (Australia) Pty Ltd. You can contact Experian at <https://www.experian.com.au/>; and
- (c) Alares Systems Pty Ltd ABN 60 612 673 953. You can contact Alares at <https://alares.com.au/contact-us>.

4.6 We may collect credit information and credit eligibility information about you from the third parties identified in Section 4.5 in the following circumstances:

- (a) assessing your application for credit, products or services;
- (b) conducting know-your-customer and ongoing customer due diligence checks;
- (c) obtaining and verifying bank statements;
- (d) conducting litigation searches;
- (e) ongoing credit monitoring in connection with renewals, variations and periodic reviews of

your credit facility; and

- (f) receiving alerts on credit events, including administration, change of directors and shareholders, and credit defaults.

## **5. Incomplete or inaccurate information**

- 5.1 We may not be able to provide you with the products or services you are seeking if you provide incomplete or inaccurate information.

## **6. Consent**

- 6.1 In most cases, before or at the time of collecting your personal information, we will obtain your consent to the purposes for which we intend to use and disclose your personal information.
- 6.2 If you don't give us consent, we may not be able to provide you with the products or services you want. This is because we are required to collect this information to provide you advice.

## **7. Withdrawing consent**

- 7.1 Having provided consent, you are able to withdraw it at any time. To withdraw consent, please contact our office. Please note that withdrawing your consent may lead to us no longer being able to provide you with the product or service you enjoy given that, as mentioned above, it is impracticable for us to treat some customers differently.

## **8. Collecting sensitive information**

- 8.1 In addition to the above conditions of collecting personal information, we will only collect sensitive information about you if we obtain prior consent to the collection of the information or if the collection is required or authorised by law.

## **9. Dealing with unsolicited personal information**

- 9.1 If we receive personal information that is not solicited by us, we will only retain it, if we determine that it is reasonably necessary for one or more of our functions or activities and that you have consented to the information being collected or given the absence of your consent that it was impracticable or unreasonable for us to obtain it under the circumstances.
- 9.2 If these conditions are not met, we will destroy or de-identify the information.
- 9.3 If such unsolicited information is sensitive information we will obtain your consent to retain it regardless of what the circumstances are.

## **SECTION C – INTEGRITY OF YOUR INFORMATION**

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### **10. Quality of your information**

- 10.1 We ensure that the personal information and credit eligibility information we collect and use or disclose is accurate, up to date, complete and relevant.
- 10.2 Please contact us if any of the details you have provided to us change or if you believe that the information we have about you is not accurate or up to date.
- 10.3 We may also take steps to update personal information we hold, for example, an address, by collecting personal information from publicly available sources such as telephone directories

or electoral rolls.

## **11. Security of your information**

11.1 We are committed to ensure that we protect any personal information and credit eligibility information that we hold about you from misuse, interference, loss, unauthorised access, modification and disclosure.

11.2 For this purpose we implement appropriate technical and organisational measures designed to safeguard personal information which are reviewed on a regular basis.

11.3 Our technical measures include:

- (a) role based access controls;
- (b) requiring the use of passwords and multifactor authentication when accessing our systems;
- (c) encrypting data sent from your computer to our systems during Internet transactions and customer access codes transmitted across networks;
- (d) employing firewalls, network monitoring, intrusion detection systems and virus scanning tools to protect against unauthorised persons and viruses from entering our systems;
- (e) providing secure storage for physical records; and
- (f) employing physical and electronic means such as alarms, cameras and guards (as required) to protect against unauthorised access to buildings.

11.4 Our organisational measures include:

- (a) training and awareness programs for staff regarding privacy, confidentiality and information security obligations;
- (b) confidentiality obligations imposed on employees, contractors and service providers;
- (c) internal processes governing access to personal information and system permissions; and
- (d) periodic review and oversight of security controls and practices.

11.5 Our monitoring and review processes include periodic reviews of security arrangements and controls to ensure they remain appropriate to the nature, sensitivity and volume of personal information held.

11.6 Thera uses third-party technology vendors to support the delivery of its services. Where such providers handle personal information, Thera takes reasonable steps to ensure those providers implement appropriate security safeguards and information handling practices, including through contractual obligations and due diligence processes where appropriate.

11.7 Where information we hold is identified as no longer needed for any purpose, we ensure it is effectively and securely destroyed using physical and electronic means. Destruction or de-identification of personal information is undertaken in accordance with documented procedures aligned with current recognised technical standards, and we maintain evidence (such as destruction certificates or system logs) to verify completion. Examples of destruction

and de-identification techniques we may apply include:

- (a) secure disposal, shredding or pulping in the case of paper records;
- (b) controlled disposal of storage media;
- (c) anonymization of information so that individuals are no longer reasonably identifiable; and
- (d) degaussing (demagnetism of the medium using alternating electric currents) and other means in the case of electronic records and equipment.

11.8 Where de-identification is used, we apply technical and organisational measures to minimise re-identification risk and review those measures on a regular basis. We also require our third-party service providers to meet equivalent destruction and de identification standards and to provide appropriate assurance evidence.

## **SECTION D – DISCLOSURE AND MANAGEMENT OF YOUR INFORMATION**

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### **12. Who we may communicate with**

12.1 Depending on the product or service you have, the entities we exchange your personal information, credit information, or credit eligibility information with may include, but are not limited to:

- (a) brokers and agents who refer your business to us;
- (b) affiliated product and service providers and external product and service providers for whom we act as agent (so that they may provide you with the product or service you seek or in which you have expressed an interest);
- (c) auditors we appoint to ensure the integrity of our operations;
- (d) any person acting on your behalf, including your solicitor, settlement agent, accountant, executor, administrator, trustee, guardian or attorney;
- (e) your referee (to confirm details about you);
- (f) if required or authorised to do so, regulatory bodies and government agencies;
- (g) credit reporting bodies;
- (h) insurers, including proposed insurers and insurance reference agencies (where we are considering whether to accept a proposal of insurance from you and, if so, on what terms);
- (i) medical practitioners (to verify or clarify, if necessary, any health information you may provide);
- (j) other financial institutions and organisations at their request if you seek credit from them (so that they may assess whether to offer you credit);
- (k) investors, advisers, trustees and ratings agencies where credit facilities and receivables are pooled and sold (securitised);
- (l) other organisations who in conjunction with us provide products and services (so that they may provide their products and services to you); and

- (m) professional associations or organisations with whom we conduct an affinity relationship (to verify your membership of those associations or organisations).

12.2 Our use or disclosure of personal information, credit information, and credit eligibility information may not be limited to the examples above.

12.3 Where we disclose your personal information to a CRB for the purpose of making an information request (for example, to undertake a credit check), we are required under the *Privacy (Credit Reporting) Code 2025 (Credit Reporting Code)* to notify you that:

- (a) we are not required to obtain your consent before making the information request;
- (b) a record of the information request may be used and disclosed by the CRB to assess your creditworthiness, including when calculating your credit score or credit rating; and
- (c) making an information request may affect your credit score.

### 13. Management of credit information

13.1 We manage your credit information and credit eligibility information in an open and transparent way, in accordance with Part IIIA of the *Privacy Act 1988* (Cth) and the Credit Reporting Code (as applicable).

13.2 We may collect and hold the following credit information:

- (a) your identification details;
- (b) records of credit applications made to us and credit enquiries made through third party credit providers;
- (c) details of credit we provide to you (including type and amount);
- (d) repayment history information;
- (e) information about overdue payments, defaults and payment arrangements; and
- (f) whether a serious credit infringement has occurred.

We collect this information from you, from your use of our products and services, and (where permitted by law) from CRBs and other third parties. We hold credit information in secure systems with reasonable technical, organisational and access controls designed to protect against misuse, interference, loss and unauthorised access, modification or disclosure.

13.3 We hold credit eligibility information comprising:

- (a) your credit report data from Equifax;
- (b) your credit score;
- (c) your repayment history;

We store this information in segregated, access-controlled repositories subject to information security safeguards commensurate with its sensitivity.

13.4 There may derive CP derived information (as that term is defined in the Privacy Act) from the credit reporting information disclosed to us by CRBs. This may include:

- (a) internal risk scores;

- (b) assessments of an obligor's creditworthiness assessments based on repayment history and other credit related information; and
- (c) serviceability assessment outcomes.

13.5 We collect, hold, use and disclose credit information and credit eligibility information to:

- (a) verify an applicant's identity;
- (b) assess credit applications and variations;
- (c) set and review credit limits and terms;
- (d) administer and manage credit products (including billing, collections, hardship, remediation and dispute resolution);
- (e) conduct reporting, audit and compliance activities;
- (f) prevent and detect fraud and other unlawful activity; and
- (g) comply with laws, regulations and the Credit Reporting Code.

Where permitted by law, we may disclose credit information to CRBs and other recipients listed in this Privacy Statement.

13.6 You may request access to your credit eligibility information using the contact details in Section 18 (Access). If you wish to obtain a copy of a credit report we have obtained about you, please see Section 21 (Access to a credit report about you), which explains how you can obtain a current copy directly from a CRB.

13.7 If you believe information we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading, you may request a correction using the process in Section 22 (Correction). We will respond within a reasonable period and, if we do not agree to correct, we will provide written reasons and how you can escalate your concern.

13.8 You may make a complaint about our compliance with the credit reporting provisions of the Privacy Act by using the process in Section 26 (Making a privacy complaint). We will acknowledge receipt, investigate, and respond within a reasonable period. If you are not satisfied with our response, you may contact the Office of the Australian Information Commissioner (**OAIC**) via the following link: <https://www.oaic.gov.au/privacy/privacy-complaints/complain-to-an-organisation-or-agency>.

13.9 We are not presently likely to disclose credit information or credit eligibility information to entities that do not have an Australian link. If this changes, we will update this Privacy Statement to specify the relevant countries (where practicable) before any such disclosures occur.

13.10 This "Management of credit information" section forms part of our Privacy Statement and is available free of charge on our website.

## 14. Outsourcing

14.1 We disclose personal information when we outsource certain functions, including bulk mailing, card and cheque book production, market research, direct marketing, statement production, debt recovery and information technology support. We also seek expert help from time to time to help us improve our systems, products and services.

14.2 We use banking agents, for example, local businesses, to help provide you with face-to-face banking services. These agents collect personal information on our behalf.

14.3 In all circumstances where personal information may become known to our contractors, agents and outsourced service providers, there are confidentiality arrangements in place. Contractors, agents and outsourced service providers are not able to use or disclose personal information for any purposes other than our own.

14.4 We take our obligations to protect customer information very seriously we make every effort to deal only with parties who share and demonstrate the same attitude.

## **15. Disclosure required by law**

15.1 We may be required to disclose customer information by law e.g. under Court Orders or Statutory Notices pursuant to taxation or social security laws or under laws relating to sanctions, anti-money laundering or counter terrorism financing.

## **16. Disclosure of your information to entities located outside Australia**

16.1 We may disclose your personal information, credit information, or credit eligibility information to our related bodies corporate and third party suppliers and service providers located overseas.

16.2 We may disclose this information to entities located outside of Australia, including our data hosting and other IT service providers in the USA, Canada, UK and European Union who may store data in these countries.

16.3 We will take reasonable steps to ensure that the overseas recipients of this information do not breach the privacy obligations relating to your personal information.

## **SECTION E – DIRECT MARKETING**

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### **17. Direct marketing**

17.1 We will only use or disclose the personal information we hold about you for the purpose of direct marketing if we have received the information from you and you have not requested not to receive such information.

17.2 Direct marketing means that we should use your personal information to provide you with information on our products and services that may interest you.

17.3 If you wish to opt-out of receiving marketing information altogether, you can:

(a) call us on 02 8001 6446; or

(b) write to us at [compliance@TheraAg.com.au](mailto:compliance@TheraAg.com.au) or Suite 1806, Level 18, 44 Market Street, Sydney NSW 2000, Australia.

## **SECTION F – ACCESS TO YOUR INFORMATION**

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### **18. Access**

18.1 You can request us to provide you with access to the personal information and credit eligibility information we hold about you by contacting [compliance@TheraAg.com.au](mailto:compliance@TheraAg.com.au).

18.2 Requests for access to limited amounts of this information, such as checking to see what

address or telephone number we have recorded, can generally be handled over the telephone by calling 1300 544 960 or +61 (0)2 8001 6446.

- 18.3 Following receipt of your request, we will provide you with an estimate of the access charge and confirm that you want to proceed.
- 18.4 We will not charge you for making the request for access, however access charges may apply to cover our costs in locating, collating and explaining the information you request.
- 18.5 We will respond to your request as soon as possible and in the manner requested by you. We will endeavour to comply with your request within 14 days of its receipt but, if that deadline cannot be met owing to exceptional circumstances, your request will be dealt with within 30 days. It will help us provide access if you can tell us what you are looking for.
- 18.6 Your identity will be confirmed before access is provided.

## **19. Exceptions**

- 19.1 In particular circumstances we are permitted by law to deny your request for access or limit the access we provide. We will let you know why your request is denied or limited if this is the case. For example, we may give an explanation of a commercially sensitive decision rather than direct access to evaluative information connected with it.

## **20. Refusal to give access and other means of access**

- 20.1 If we refuse to give you access to your information or to give access in the manner requested by you, we will give you a written notice setting out the reasons for the refusal, the mechanisms available to complain and any other relevant matter.
- 20.2 Additionally, we will endeavour to give access in a way that meets both yours and our needs.

## **21. Access to a credit report about you**

- 21.1 You have the right to ask for a copy of any credit report we have obtained about you from a credit-reporting agency. However, as we may not have retained a copy after we have used it in accordance with Part IIIA of the Privacy Act the best means of obtaining an up-to-date copy is to get in touch with the credit-reporting agency direct. We will take reasonable steps to provide you with an accessible means to request access, and, where needed, we can help you identify the relevant CRB. To obtain the most up to date information about you, you should request your credit reporting information directly from a CRB and we can assist you by providing contact details for the major CRBs.
- 21.2 You have a right to have any inaccuracies corrected or, if there is any dispute as to accuracy, to have a note added to your credit reporting agency file explaining your position. If you believe any credit related information is inaccurate, out of date, incomplete, irrelevant or misleading, including where this has occurred because of fraud or identity theft, you may make a request to correct any credit related information in accordance with section 22 (Correction) below.
- 21.3 If we decline your credit application wholly or partly because of adverse information on your credit report, the Privacy Act, requires us to tell you of that fact and how you can go about getting a copy of your credit report. Where appropriate, we will also tell you how to seek correction of that information (including where you suspect fraud).

21.4 The major credit-reporting agency in Australia is Equifax, <https://www.equifax.com.au/>. As the largest agency, it is likely that it will be Equifax that you will need to contact in relation to access to an up-to-date copy of your credit report and any correction of information on your file. You can contact Equifax at <https://www.equifax.com.au/contact>.

## **SECTION G – CORRECTION OF YOUR INFORMATION**

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### **22. Correction**

22.1 You may request that we correct the personal information, credit information and credit eligibility information that we hold about you. We will take such steps as are reasonable in the circumstances to correct your information if we believe that this information is inaccurate, out-of-date, incomplete, irrelevant or misleading.

22.2 If we correct your personal information that we previously disclosed to another APP entity, you can request us to notify the other APP entity of the correction. Following such a request, we will give that notification unless it is impracticable or unlawful to do so.

### **23. Refusal to correct information**

23.1 If we refuse to correct your information as requested by you, we will give you a written notice setting out the reasons for the refusal, the mechanisms available to complain and any other relevant matter.

### **24. Request to associate a statement**

24.1 If we refuse to correct the personal information as requested by you, you can request us to associate with the information a statement that the information is inaccurate, out of date, incomplete, irrelevant or misleading. We will then associate the statement in such a way that will make the statement apparent to users of the information.

## **SECTION H – CONTACT US AND COMPLAINTS**

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### **25. Contact**

25.1 If you have any questions or would like further information about our privacy and information handling practices, please contact us by:

- (a) Email: [compliance@TheraAg.com.au](mailto:compliance@TheraAg.com.au); or
- (b) Phone: 02 8001 6446; or
- (c) Post: Suite 1806, Level 18, 44 Market Street, Sydney NSW 2000, Australia.

### **26. Making a privacy complaint**

26.1 We offer a free internal complaint resolution scheme to all of our customers. Should you have a privacy complaint, please contact us to discuss your concerns.

26.2 You will also have free access to an external dispute resolution scheme in which we are member.

26.3 To assist us in helping you, we ask you to follow a simple three-step process:

- (a) Gather all supporting documents relating to the complaint.
- (b) Contact us and we will review your situation and if possible resolve your complaint immediately.
- (c) If the matter is not resolved to your satisfaction, please contact our Complaints Officer on 02 8001 6446 or put your complaint in writing and send it to Thera Capital Management Suite 1806, Level 18, 44 Market Street, Sydney NSW 2000, Australia.

26.4 If you are still not satisfied, you have the right to contact the OAIC. You can contact the OAIC to make a query concerning your privacy rights, or to lodge a complaint with the OAIC about how we have handled your personal information. You can contact the OAIC's hotline on 1300 363 992 or visit their website at [www.oaic.gov.au](http://www.oaic.gov.au). The OAIC has the power to investigate a complaint and make a determination.