



Triple Bubble Fund Privacy Policy

Policy last updated: 9th October 2026

1 Purpose and nature

Fintech Fund Management Co Pty Ltd (ACN 678 455 760) (**Fintech Fund Management, we, us or our**) acts as investment manager of the 'Triple Bubble Fund' (**Triple Bubble or the Fund**). This Privacy Policy sets out how Fintech Fund Management, in carrying out its functions as investment manager of the Fund, collects, stores, uses, discloses, protects and otherwise handles your personal information having regard to the Australian Privacy Principles (**APPs**) contained in the *Privacy Act 1988* (Cth) (**Privacy Act**).

This Privacy Policy does not constitute a contractual representation, promise, guarantee or warranty by Fintech Fund Management or any of its related entities, officers, employees or service providers, to you as to the manner in which Fintech Fund Management will or may collect, store, use, disclose, protect or otherwise handle your personal information. Some matters are beyond our control, such as third party malicious or criminal attacks.

We may disclose your personal information to our related entities, employees, officers and service providers, and may permit them to access and handle your personal information, where reasonably necessary for our functions and activities and in accordance with this Privacy Policy. We take reasonable steps to ensure those parties protect your personal information in accordance with applicable privacy laws.

2 What is personal information?

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not and whether the information or opinion is recorded in a material form or not.

3 Why do we collect and hold personal information?

We collect personal information for the following primary purposes:

- (a) to manage and administer the Fund and investor relationships;
- (b) to assess investment opportunities and conduct due diligence on potential investee companies;
- (c) to process and evaluate pitch decks and investment proposals;
- (d) to communicate with investors, prospective investors and investee companies;
- (e) to administer agreements and transactions;
- (f) to comply with legal obligations, including obligations under applicable anti-money laundering and counter-terrorism financing (**AML/CTF**) laws and the *Corporations Act 2001* (Cth);
- (g) to participate in the Equity Clear program, including compiling and submitting gender data for anonymised, sector-wide gender diversity reporting;
- (h) to manage employment and contractor relationships;
- (i) to respond to enquiries and complaints; and

- (j) to improve our services and conduct research.

We may also use or disclose your personal information for secondary purposes closely related to these primary purposes where you would reasonably expect that use or disclosure or where otherwise permitted by law.

If we do not collect your personal information, we may not be able to provide our services, manage the Fund or assess investment opportunities.

4 What personal information do we collect?

The types of personal information we collect and hold may include:

- (a) names;
- (b) gender and gender identity;
- (c) contact details (including address, email address, telephone numbers, and other contact details);
- (d) pitch decks and other company information submitted by founders and entrepreneurs;
- (e) financial and investment information;
- (f) identification documents, where required for AML/CTF verification or other lawful purposes;
- (g) tax file numbers, where required;
- (h) employment information, including information provided by employees and contractors;
- (i) bank account details; and
- (j) any other personal information you provide to us.

4.1 Sensitive Information

The personal information we collect may include sensitive information, which is defined in the Privacy Act as information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a trade union or other professional body, sexual orientation or practices, criminal record, health information, genetic information or biometric information.

We collect gender information for the Equity Clear program through our investment application form. The form asks how the founding team identifies – this question is mandatory, however individuals may select 'prefer not to say'. Before the form is submitted, individuals are informed that the information will be disclosed to Equity Clear and are directed to this Privacy Policy. Gender information may, depending on the circumstances, constitute sensitive information. Where information is sensitive information, we will obtain consent (which may be express or implied, as permitted by law) before collecting it and disclosing it to Equity Clear.

We will only collect sensitive information where it is reasonably necessary for our functions and activities and the individual has consented, or where another legal basis applies, including where collection is required or authorised by law or a permitted general situation exists under the Privacy Act.

We will only use or disclose sensitive information for the purpose for which it was collected, a directly related purpose reasonably expected by the individual, with consent, where required or authorised by law, or where otherwise permitted by the Privacy Act.

5 How do we collect your personal information?

We will collect personal information only by lawful and fair means and not in an unreasonably intrusive manner. We will take such steps (if any) as are reasonable in the circumstances to ensure that personal information collected is accurate, up-to-date, complete and relevant to the purpose for which it is collected. Where appropriate and possible, we will explain why we are collecting the information and how we plan to use it.

5.1 Collecting information from you

If it is reasonable and practicable to do so, we will collect personal information directly from you.

We may collect your personal information directly from you when you:

- (a) submit an investment application, pitch deck, investment proposal or other company information;
- (b) make an enquiry or communicate with us through our website, by email or by phone;
- (c) enter into or administer an agreement or transaction with us or the Fund; or
- (d) apply for employment or a contractor engagement with us.

Where we require consent to collect, use or disclose personal information, including sensitive information, we will seek that consent. In other cases, we will handle personal information as described in this Privacy Policy and as permitted by law.¹²

5.2 Collecting information from third parties

We may collect information about you from third parties, including financial advisers, personal referees, publicly available sources and service providers, where it is not reasonable or practicable to collect the information from you directly. Where we collect personal information from a third party, we will take reasonable steps to ensure that the individual is made aware of the matters required by the Privacy Act and will handle that information in accordance with this Privacy Policy.

5.3 Collecting information from visits to our website

We may also collect information based on how you use our website, including through cookies and other similar technologies.

Cookies are small text files that are transferred to your computer's hard drive through your web browser to enable our systems to recognise your browser and record information such as the date, time or duration of your visit, the pages accessed, and device or browser information for website administration, security, statistical and maintenance purposes (**Cookie Information**).

We use cookies to provide you with a more consistent experience across our services and to understand website usage and improve our services. No attempt is made by us to use Cookie Information to personally identify you. However, if Cookie Information is linked with personal information, that Cookie Information becomes personal information and will be treated in the same manner as the personal information to which it has been linked.

You can remove or reject cookies by adjusting the settings on your web browser. Please note that some parts of our website may not function fully for users who disable cookies.

5.4 Unsolicited information

If we receive personal information that we have not solicited and determine that the information is not reasonably necessary for our functions or activities, we will take all lawful and reasonable steps (if any) to de-identify or destroy that personal information as soon as practicable.

We may use or disclose the personal information to make that determination, as permitted by the Privacy Act.

6 **How do we hold your personal information?**

The security of your personal information is important to us. Accordingly, we take reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, modification or disclosure, whether stored in physical or electronic form. These steps include:

- (a) use of encrypted HTTPS for communications;
- (b) holding personal information in physical records, secure hosted environments, and cloud platforms, including Google Drive, Claude, ChatGPT, Dropbox and Notion, all of which are used through enterprise-grade accounts with SOC compliance and no model data sharing enabled;
- (c) access controls, multi-factor authentication, role-based permissions and audit logs;
- (d) staff training and internal information security policies; and
- (e) vendor due diligence, breach response and retention and deletion controls.

We will take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for the purpose for which the information was used or disclosed, unless retention is required by law or a court or tribunal order.

6.1 Notifiable data breaches

If we suspect that a data breach may have occurred, we will promptly contain and assess the incident. We will generally complete an assessment within 30 days of becoming aware of the relevant circumstances. Where the breach is an eligible data breach under Part IIIC of the Privacy Act, we will notify the Office of the Australian Information Commissioner and affected individuals as soon as practicable and will take reasonable steps to reduce the risk of serious harm.

7 How do we use your personal information?

We may hold, use or disclose your personal information for the primary purposes described in clause 3. We will take such steps (if any) as are reasonable in the circumstances to ensure that personal information we use or disclose is accurate, up-to-date, complete and relevant having regard to the purpose of the use or disclosure.

We may also use or disclose your personal information where reasonably necessary to prevent fraud, misconduct or unlawful activity, to establish or defend legal rights or where required or authorised by law.

7.1 Direct marketing

We may use or disclose your personal information to send you investment updates, information about the Fund, fund performance, events, services or other communications that may be of interest to you, where permitted by law. We will not use or disclose sensitive information for direct marketing unless you have consented to that use or disclosure.

At any time, you may opt out of receiving direct marketing communications from us by clicking the unsubscribe option in the relevant communication or by contacting us using the contact details below. We will give effect to an opt-out request within a reasonable period and, where APP 7 applies, generally within 30 days. There is no charge to make an opt-out request or to give effect to it. On request, we will also advise you of the source of personal information used for direct marketing, unless it is unreasonable or impracticable to do so.

7.2 Use of AI-enabled tools

We may use platforms such as Claude to undertake an initial review of documents submitted to us, including pitch decks. This may involve Claude (or other AI-enabled platform) processing personal information contained in a pitch deck or other document and generating an analysis that assists our investment assessment. The AI-enabled platform does not make the ultimate investment decision; its output is reviewed by our team and is only one factor relevant to the decision-making process.

8 How is personal information disclosed to others?

We do not sell, rent or trade personal information to or with third parties.

We may disclose your personal information to third parties in limited circumstances, including:

- (a) to regulators and government agencies, including ASIC, the ATO and AUSTRAC, courts, tribunals and other authorities, when required or authorised by law;
- (b) to third-party service providers that support our functions and activities, including Attio, Google Drive, Claude, ChatGPT, Dropbox and Notion, and providers of hosting, storage, information technology, administration and other services;
- (c) to professional advisers, including lawyers, accountants, auditors and other consultants;
- (d) to Equity Clear for the purposes of the Equity Clear program, including quarterly submission of gender data for anonymised, sector-wide gender diversity reporting, where consent has been obtained where required;

- (e) to related entities and other parties involved in managing and administering the Fund and investor relationships; and
- (f) where required or authorised by law, where reasonably necessary to prevent or investigate fraud or misconduct, or with your consent.

Where we engage service providers to handle personal information on our behalf, we take reasonable steps to require those providers to protect the information, use it only for authorised purposes and comply with applicable privacy obligations.

Independent third-party websites, platforms or organisations may have their own privacy practices and we are not responsible for those independent privacy practices.

8.1 Third party links

Our website may contain links to other websites. We do not share your personal information with those websites merely because you follow a link and we are not responsible for the privacy practices applying in respect of those websites.

8.2 Cross-border disclosure

We are likely to disclose personal information to overseas recipients, including service providers that host, store, process or support systems used by us. Attio, Google Drive, Claude/Anthropic, ChatGPT/OpenAI, Dropbox and Notion may store or process personal information in the United States or other countries in which those providers or their subcontractors operate. It may not be practicable to specify all countries in which recipients may be located because this may depend on the provider, support model, hosting region and subcontractor arrangements. We take reasonable steps to ensure that overseas recipients handle personal information consistently with the APPs and this Privacy Policy.

9 How you may access or correct your personal information

You may contact us to request access to personal information we hold about you at any time. You may also ask us to correct personal information that you believe is inaccurate, incomplete or out of date.

Please contact us using the contact details set out in clause 11. We will need to verify your identity before giving you access to, or correcting, your personal information. We will respond within a reasonable period and generally within 30 calendar days. There is no charge to make a request to access or correct your personal information. We may charge a reasonable administrative fee for giving access to the information, where permitted by law. We will tell you about any proposed fee before providing access. We will not charge you for correcting your personal information.

In certain circumstances, we may refuse, or be unable, to provide access to or correct personal information where permitted or required by the Privacy Act or another law. For example, access may be refused where giving access would pose a serious threat to life, health or safety, unreasonably affect another person's privacy, prejudice legal proceedings, negotiations, unlawful activity or enforcement-related activities, or reveal evaluative information generated in a commercially sensitive decision-making process. In these circumstances, we will write to you to explain the reasons why this is the case.

10 How you may complain if you have concerns about how we have managed your personal information

If you have a complaint about how we have managed your personal information, this Privacy Policy or a breach of the APPs, you may make a complaint in writing to us using the contact details set out in clause 11. We may ask you to provide further information or supporting documents so that we can properly understand and investigate your complaint. We may need to verify your identity before responding to your complaint.

We will acknowledge receipt of your complaint and provide you with an estimated response timeframe. In any event, we will endeavour to respond to your complaint within 30 days. If we decide not to take action on your complaint, we will notify you in writing of our reasons and the mechanism available to you to complain further, including to the Office of the Australian Information Commissioner (www.oaic.gov.au).

11 How to contact us

If you have any questions about this Privacy Policy or our management of your personal information, please contact us on:

Attention: Nick Carter

Tel: +61407688537

Email: nick@triplebubble.com.au

Address: Sanders Place, 11-15 Albert Street, Richmond, Victoria, 3121

Where lawful and practicable, you may deal with us without identifying yourself or by using a pseudonym. However, in most cases, we will need to verify your identity in order to provide our services, manage the Fund or comply with our legal obligations (including under AML/CTF laws), and it may not be practicable for us to deal with you on an anonymous or pseudonymous basis.

12 Changes to our Privacy Policy and information handling practices

This Privacy Policy is subject to change at any time, so we encourage you to review this Privacy Policy at regular intervals. If we change this Privacy Policy, an updated version will be posted on our website.