

# Ausbil Investment Management

## PRIVACY POLICY

November 2023

**Ausbil Investment Management Limited (“Ausbil or we”) respects your right to privacy and is committed to protecting your personal information. We are bound by the Australian Privacy Principles (“APPs”) in the Privacy Act 1988 (Commonwealth) (“Act”), which legislates a national scheme for the collection, use, correction, disclosure and transfer of personal information by organisations in the private sector. This Ausbil Privacy Policy explains how we comply with the APPs (“Policy”).**

## **Purpose**

The Policy outlines how we collect, store, use, disclose, protect and otherwise handle your personal information in accordance with the APPs. ‘Personal information’ is any information or opinion that can be used to reasonably identify you, whether the information or opinion is true or not.

By providing us with your personal information, you consent to us using, disclosing and otherwise handling your personal information in accordance with this Policy, as updated from time to time.

## **Collection**

Subject to legislative requirements, we will only collect personal information relevant to our business relationship with you including whether we are collecting the information from you as an investor or client, a supplier, contractor, job applicant or employee.

As such, the nature of our business relationship with you, the product or service that we provide or receive will determine what information we collect. If you are an investor or client, we may collect your name, residential and/or postal address, date of birth, email address, employment information, financial details (including banking details, investment details), government issued identifying numbers (such as tax file number or national identity number), citizenship, passport details, or other information that we consider necessary to provide our product or service.

In the context of our recruitment process, we may collect your name, date of birth, residential address, citizenship, employment references, background checks, education, employment history, contact details or other information that we consider necessary to process your employment application.

We may collect your personal information in a variety of different ways including directly from you (including in person, by telephone, letter, facsimile, email, via an application form which may be either paper based or online), indirectly from your nominated agent (such as a financial adviser, agent or attorney) or indirectly from third parties (such as a government database for the purpose of complying with ‘Know Your Client’ requirements).

The collection of sensitive personal information is restricted by the provisions of the Act. This means we will not collect any information such as personal information relating to your religious views, ethnicity, political opinion, criminal record, health, sexual preference, unless it is required for a purpose specifically disclosed to you at the time of collection.

Ausbil has the capability to collect information about the use of our website. This information could include the number of users, when they visit, how they navigate through the pages, which pages are visited and the amount of time spent on looking through the website. Similar statistical information is also collected when we distribute other electronic material such as marketing information on our products and services. By using this website, you agree to our collection and use of this information.

You are not required to give us the information that we request. However, if you do not give us the information that we ask for or the information you give us is incomplete or inaccurate, this may prevent or delay the processing of your application or any claim, prevent us from contacting you or impact on the taxation treatment of your account.

## Use & Disclosure

When we collect personal information from you, we will inform you of the purposes for which it is collected. The information may be used to:

- verify your identity
- provide you with our products or services
- answer enquiries and provide information about our products or services
- establish and manage your accounts or investments with us
- implement your investment instructions, process contributions, transfer monies or pay benefits
- report the investment performance of your account
- keep you up to date on other services and products offered by us including providing marketing information and materials
- conduct market research to develop new products
- prevent fraud and crime in relation to the products or services we are providing on your behalf
- comply with our internal policies and procedures
- comply with laws, regulations, rules, directions, or requests from regulatory or government agencies
- process an application for employment
- investigate and respond to any complaint
- establish, exercise or defend legal rights or for the purpose of legal proceedings.

We may need to disclose your personal information to another person or organisation. However, we will only disclose the information if we are allowed to by law and have your express or implied consent, or where we are obliged to by law.

We may disclose your personal information to various third parties, including:

- our related body corporate, any organisations involved in providing, managing, or administering our products and services such as custodians, administrators, unit registry services, actuaries, external dispute resolution services, insurers, or printing and mail houses
- any person acting on your behalf, or nominated by you to receive certain information, including your financial adviser, broker, solicitor or accountant, executor, administrator, trustee, guardian or attorney
- our data hosting and IT service providers who may be located or store data in other countries
- regulatory bodies, government agencies, law enforcement bodies, courts and other parties we are authorised by law to disclose information to
- any financial institution nominated by you
- auditors
- external dispute resolution bodies
- where you have given your consent.

We will not disclose or use the information for any other purpose other than for what it is collected.

Because we operate throughout Australia and overseas, some of these uses and disclosures may occur outside your state or Territory and/or outside of Australia, however we will take reasonable steps to ensure that the overseas recipient does not breach the APPs.

## Marketing Our Products & Services

We may use or disclose your personal information to let you know about, and develop, products and services that might better serve your financial, e-commerce and lifestyle needs, or promotions or other opportunities in which you may be interested. You can contact us at any time if you no longer wish to do so.

## Outsourcing

We may disclose personal information to external organisations that help us to provide services. For example, we may provide names and addresses to a mailing house to mail account statements to you. We may also seek expert help from time to time to improve our IT systems. These organisations are bound by confidentiality agreements as well as the APPs.

## Cookies

We use cookies on our online services. Please see our Cookie Policy for details.

## Third Party Sites

Our Website contains links to other sites, which are controlled by third parties. Visitors should consult these other sites' privacy policies and please be aware that we do not accept responsibility for their use of information about you.

## Protecting Your Personal Information & Website Security

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

We have physical, electronic and procedural safeguards to protect your information that is held by us. For example, your personal information is stored in secure office premises, in electronic databases requiring logins and passwords for access and at secure offsite storage facilities. Access to information stored electronically is restricted to staff whose job requires access.

We take care to ensure that the personal information you give us on our website is protected. Our websites have electronic security systems in place, including the use of firewalls and data encryption.

You should note that there are inherent security risks in transmitting information through the internet. You should assess these potential risks when deciding whether to use our online services. If you do not wish to transmit information through our website, there are other ways in which you can provide this information to us. For example, you can contact our client service team (details on page 5).

## Eligible Data Breach

We will notify you, and our third party service providers are required to notify us, of any unauthorised access, disclosure or loss of your personal information.

In such circumstances, we will perform an assessment as to whether an 'eligible data breach' has occurred which is any unauthorised access, disclosure, or loss of personal information where the access, disclosure or loss is likely to result in serious harm to any of the individuals to whom the information relates to.

If we determines that an 'eligible data breach' has occurred then we will notify the affected individuals as soon as practicable, detailing the nature of the breach and the recommended response to the breach. We will also notify the Office of the Australian Information Commissioner.

## Access & Correction of Information

You can access most of the personal information we hold about you and request corrections. Your right of access is subject to some exceptions allowed by law. If you wish to access your personal information, you should contact us through our office (see contact details below).

Factors affecting a right to access include:

- access would pose a serious threat to the life or health of any individual
- access would have an unreasonable impact on the privacy of others
- a frivolous or vexatious request

- the information relates to a commercially sensitive decision-making process
- access would be unlawful
- legal dispute resolution proceedings
- we are prevented by law from disclosing.

If for some reason we are unable to comply with your request to access your personal information, we will inform you and explain the reasons why. You may request us to provide the source of the personal information we hold, which will be notified unless it is impractical or unreasonable to do so.

You have a right to ask us to correct any information we hold about you if you believe it is inaccurate, incomplete, out of date, irrelevant or misleading. If we do not agree with the corrections you have supplied and refuse to correct the personal information, we are required to give you written notice to that effect and a statement if requested.

## Using Government Identifiers

We only use or disclose your tax file number or other government agency identifier for the purposes required by law. Ausbil is not permitted and does not adopt government identifiers as identifier of any individual.

## We Destroy Information We No Longer Need

We will destroy personal information if it is no longer needed for the purposes for which it was collected or for the purposes of meeting legal requirements. We use secure methods to destroy or de-identify any personal information as soon as the law permits, provided the information is no longer needed by us for any purpose. Ordinarily, for information about a particular account, we destroy the information 7 years from the day you close the account. All information stored in electronic form that is no longer required will be deleted from our system.

## Complaints

If you believe that we have mishandled your personal information, in turn, breaching the APPs, you may lodge a complaint with us. The complaint, addressed to the Compliance Officer (see details below), must be in writing in accordance with the Act. From receipt of your written complaint, the Compliance Officer has 30 days to respond.

## Changes to this Policy

The Policy is available on our website, [www.ausbil.com.au](http://www.ausbil.com.au), or can be obtained by contacting our Client Services Team (see details below).

We may change this policy from time to time as necessary. We encourage you to check our website for any updates to this policy. This policy was last reviewed and updated in November 2023.

## Contacting Us

If you have any questions about this Policy, if you have a concern or would like to make a complaint about our collection, use or management of your personal information, or if you wish to access or correct your personal information, please contact the appropriate person as set out below.

### Compliance Officer

Telephone: 02 9259 0230  
Email: [compliance@ausbil.com.au](mailto:compliance@ausbil.com.au)  
Mail: GPO Box 2525  
Sydney NSW 2001

### Client Services

Telephone: Toll Free 1800 287 245

If we do not resolve a privacy related complaint to your satisfaction, you may refer the matter to the Office of the Australian Information Commissioner on 1300 363 992 (see [www.oaic.gov.au](http://www.oaic.gov.au)).