

## Privacy at Colonial First State Global Asset Management

At Colonial First State Global Asset Management, the privacy of your personal information is important to us. Our definition of personal information is consistent with Australia's National Privacy Policy which defines Personal Information as information or opinion that allows others to identify you. It includes your name, age, gender, contact details, as well as your health and financial information.

We collect personal information to provide you with the products and services you request as well as information about compatible or related products and services we offer. In some circumstances the law may also require us to collect personal information.

### **How is your personal information dealt with?**

In the course of doing business we outsource certain tasks to third party suppliers. In these circumstances we may disclose your personal information to third parties including mailing houses, information technology support and email suppliers. From time to time we also seek expert help to improve our systems, products and services. These third parties are bound by confidentiality agreements when handling your personal information. In addition, your personal information will not be shared with third parties, other than of this kind, without your consent.

Your personal information may also be used by us to administer, monitor and evaluate products and services, gather, aggregate and report statistical information, assist you with any queries and take measures to detect and prevent fraud and other illegal activity. We may also be allowed or obliged to disclose information by law and to report on prudential or risk management matters to regulators and our related bodies.

If you use a financial adviser, details of your investments may be provided to that person.

### **Accuracy of your personal information**

We aim to ensure that the personal information we retain about you is accurate, complete and up-to-date. You will be taken to agree to the use, collection and disclosure of your personal information when you make an investment in the fund. If you provide us with incomplete or inaccurate information, we may not be able to provide you with the products or services you are seeking.

### **Online services**

For statistical purposes we collect information on web site activity (such as the number of users who visit our web site, the date and time of visits, the number of pages viewed, navigation patterns, what country and what systems users have used to access the site and, when entering our web site from another web site, the address of that web site) through the use of '[cookies](#)'. This information on its own does not identify an individual but it does provide us with statistics that can be used to analyse and improve our web site.

If you have any questions or would like further information on our privacy and information handling practices, you can call Investor Services on 13 13 36.

# Colonial First State Global Asset Management Privacy Policy

## Background

### Australian Law

In December 2000, the Australian Government amended the Privacy Act 1988 and implemented the National Privacy Principles, which include provisions that regulate the way Australian organisations collect, use, disclose, keep secure and provide access to personal information. Colonial First State Global Asset Management is bound to protect your personal information in accordance with the National Privacy Principles, to the extent required by the Privacy Act 1988.

### This document

This document gives information on how we protect the personal information we hold about you. It also includes information on how the Commonwealth Bank Group (of which entities within Colonial First State Global Asset Management are wholly owned subsidiaries) protects personal information. The aim of the Colonial First State Global Asset Management privacy policy is to give you comfort that the personal information you provide to us will be kept in the strictest confidence. We acknowledge that circumstances may change and our policy will be reassessed accordingly.

## Colonial First State Global Asset Management Privacy Policy

At Colonial First State Global Asset Management the privacy of your personal information is of paramount importance to us. We collect personal information when you inquire about or make an investment with us. We retain this information to maintain an investment, on behalf of you, in Colonial First State Global Asset Management funds as well as to provide you with information about the products and services we offer. In some circumstances the law may also require us to collect personal information.

The Australian Privacy Act defines **personal information** as information or an opinion about an individual whose identity is apparent or can reasonably be ascertained. It includes your name, age and contact details as well as your health and financial information. The following statement outlines our general information handling practices, and is generally reflected in our offer documents. (Offer documents generally refer to Product Disclosure Statements or information memorandums).

### How is my personal information dealt with?

In the course of doing business we outsource certain tasks to third party suppliers. In these circumstances we may disclose your personal information to third parties including mailing houses, information technology support and email suppliers. From time to time we also seek expert help to improve our systems, products and services. These third parties are bound by confidentiality arrangements when handling your personal information.

Your personal information may also be used by us to administer, monitor and evaluate products and services, assist you with any queries and take measures to detect and prevent fraud and other illegal activity, or incorporated into statistical analysis. We may also be allowed or obliged to disclose information by law and to report on prudential or risk management matters to regulators and our related bodies.

If you use a financial adviser, details of your investments may be provided to that person.

We aim to ensure that the personal information we retain about you is accurate, complete and up-to-date. If you provide us with incomplete or inaccurate information, we may not be able to provide you with the products or services you are seeking.

If you have any questions or would like further information on our privacy and information handling practices, please contact us by calling our Service Centre on **13 13 36**, or e-mailing us at [feedback@colonialfirststate.com.au](mailto:feedback@colonialfirststate.com.au)

## Collection of personal information

### **What is 'personal information'?**

Personal information is information or an opinion, whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

### **Why we collect information**

Personal information is collected so that we may:

- administer our customer relationships; and
- make and maintain investments for a customer in Colonial First State Global Asset Management Funds and, unless the customer tells us otherwise, to provide information on other products and services offered by Colonial First State Global Asset Management.

We may also use personal information for other purposes such as:

- monitoring and evaluating products and services;
- statistical, prudential, actuarial and research purposes;
- assisting customers with queries; and
- taking measures to detect and prevent frauds.

### **What we collect**

Colonial First State Global Asset Management collects personal information on investors via application forms, other Colonial First State Global Asset Management forms, phone, fax, email and online. Personal information collected from investors include:

- name
- contact details
- Australian Tax File Number, exemption reason or country of residence
- bank account information
- investment information
- employment information
- responses to surveys

We may also collect personal information when you request information on our products.

### **What if you provide incomplete or inaccurate information?**

We may not be able to provide you with the products or services you are seeking.

Who we may disclose information to (this includes, but is not limited to, the following persons):

- Any person acting on your behalf, including your financial adviser, solicitor, accountant, executor, administrator, trustee or guardian, as long as you have told us that this person is authorised to act on your behalf.
- Auditors we appoint to ensure the integrity of our operations
- If required or authorised to do so, regulatory bodies and government agencies

### **Consent**

The main purpose for Colonial First State Global Asset Management collecting your information is to make and maintain an investment, on your behalf, in Colonial First State Global Asset Management funds where we are the responsible entity or trustee. Our offer documents set out in more detail the way

an investor's personal information is used. The terms of our offer and the type of information we will send you are set out in each Product Disclosure Statement or Information Memorandum. By making an investment, you consent to the way we use your personal information. If you do not wish to receive any further information from us about the products and services we offer, you can let us know by calling **13 13 36** or by emailing [contactus@colonialfirststate.com.au](mailto:contactus@colonialfirststate.com.au) .

#### **Disclosure required by law**

We may be required or authorised by or under law to disclose information, for example, when we are served with a court order. We may also be required by a Government Agency to produce information and records, for example, in relation to taxation or social security laws.

### **Personal information quality**

We take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and up-to-date.

Please contact us by calling our Service Centre on **13 13 36**, or e-mailing us at [feedback@colonialfirststate.com.au](mailto:feedback@colonialfirststate.com.au), if any of your personal details change. Please also contact us if you believe that the information we have about you is not accurate, complete or up-to-date.

#### **Personal information security**

We are committed to keeping secure the personal information you provide to us. We take all reasonable precautions to protect the personal information we hold about you from misuse and loss and from unauthorised access, modification or disclosure.

We have a range of physical and technology policies in place to provide a robust security environment. We ensure the on-going adequacy of these measures by regularly reviewing them.

Our security measures include, but are not limited to:

- restricting access to our computer systems and physical records to authorised persons and preventing users from accessing information they have no need to access;
- requiring employees to use unique passwords to gain access to systems. These passwords are changed regularly and their use is independently monitored;
- encrypting data sent from your computer to our systems during Internet transactions and customer access codes transmitted across networks;
- employing firewalls, intrusion detection systems and virus scanning tools to prevent unauthorised persons and viruses from entering our systems;
- using dedicated secure networks or encryption when we transmit electronic data for purposes of outsourcing;
- providing secure storage for physical records; and
- detecting and preventing unauthorised access to buildings by employing physical and electronic means such as alarms, cameras and guards as required.

Where information we hold is identified as no longer needed for any purpose we take reasonable steps to effectively and securely destroy it.

### **Online services**

#### **Collection of information via web site activity**

For statistical purposes we collect information on web site activity (such as the number of users who visit our web site, the date and time of visits, the number of pages viewed, navigation patterns, what country and what systems users have used to access the site and, when entering our web site from another web site, the address of that web site) through the use of 'cookies'. This information on its own does not identify an individual but it does provide us with statistics that can be used to analyse and improve our web site. We may also collect your personal information via your use of our web site. Generally, the information that we collect is what you give us when you complete a form or otherwise make an enquiry or transaction via the web site.

## **Cookies**

A 'cookie' is a packet of information that allows the server (the computer that houses the web site) to identify and interact more effectively with your computer.

When you use our web site, we send you a temporary cookie that gives you a unique identification number. A different identification number is sent each time you use our web site. Cookies do not identify individual users, although they do identify a user's browser type and your Internet Service Provider (ISP).

To evaluate the effectiveness of our web site, we may use third parties to collect statistical data. No personal data is collected on these occasions.

You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent. Please refer to your browser instructions or help screens to learn more about these functions. If you reject all cookies, you may not be able to use our web sites.

At the end of your interaction with our web site, the cookie 'crumbles'. This means it no longer exists on your computer and therefore it cannot be used for further identification or access to your computer.

## **Links to other web sites**

Our web site may contain links to non-Colonial First State Global Asset Management web sites. While such links are provided for your convenience, you should be aware that the information handling practices of the linked web sites might not be the same as ours. You should review any privacy policies on those linked websites. We are not responsible for any linked websites.

## **Telephone services**

We may monitor and record telephone calls for training and security purposes. If we do so, we will tell you at the time.

## **Changes to our privacy and information handling practices**

Colonial First State Global Asset Management may make changes to our privacy and information handling practices from time to time for any reason. We will publish those changes on our web site and, if there are important changes or a lot of minor changes, by updating this document.

## **Access to personal information**

You can request us to provide you with access to the personal information we hold about you.

In most cases, your personal information is accessible to you via:

- written request
- fax request
- phone request
- FirstNet access

We have processes and procedures in place for the correction of any errors brought to our attention. All procedures involve the identification of the investor through security checks.

If you complete a survey for us, we may keep the information you provide to improve our services and products.

## **Jointly held information**

Where we hold your personal information in conjunction with that of another individual or individuals (eg. where you jointly conduct an account), we will allow each individual access to their own personal information and to the joint information (eg. Account balances and transaction details) but not to the personal information of the other individual(s).

### **Responding to an access request**

We will respond to your access request as soon as possible. There is no charge for access to your personal information.

### **Contact us about our privacy and information handling practices**

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

- calling our service centre on **13 13 36**, or
- e-mailing us at [feedback@colonialfirststate.com.au](mailto:feedback@colonialfirststate.com.au)

If you have any concerns or complaints about our privacy and information handling practices, please contact us as above. We will acknowledge your concern promptly, investigate the concern, and reply to you, advising of any decision and informing you of any remedies available, including possible appeal through dispute resolution bodies.

### **How the Commonwealth Bank Group handles your personal information**

The entities within Colonial First State Global Asset Management are wholly owned subsidiaries of the Commonwealth Bank of Australia ('Group', 'We'), a leading Australian financial services organisation.

The Group is a collection of related organisations that provide banking, insurance, funds management, financial planning and advice, superannuation, stockbroking, and finance services.

We value your trust, and aim to help you manage and build wealth over a long period. The protection of your personal information is a vital part of this relationship. It is supported by our long experience of keeping personal information confidential.

We collect personal information to provide you with the products and services you request as well as information on other products and services offered by us. The law may also require us to collect personal information. We will tell you who collects the personal information, advise you of their contact details, your right of access to that information, and what will happen if you choose not to provide the information.

Personal information may be used and disclosed within the Group to administer our products and services, as well as 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 co-operate with police and other enforcement bodies as required or allowed by law. 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. 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, rather than direct access to evaluative information connected with it.

\* Information collected by Colonial first State Global Asset Management will not be used by other Group members for marketing purposes, unless otherwise disclosed in the relevant offer document.