

Australian
Ethical



AUSTRALIAN ETHICAL GROUP PRIVACY POLICY

Document Owner

General Counsel

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1. Purpose and Scope

This Privacy Policy applies to Australian Ethical Investment Limited (ACN 003 188 930) (**Australian Ethical, we, us, our**) and our subsidiaries and related bodies corporate, including (but not limited to) Australian Ethical Superannuation Pty Ltd (ACN 079 259 733) (**Australian Ethical Super**).

This Privacy Policy documents how Australian Ethical complies with the provisions of the *Privacy Act 1988* (Cth) (**Privacy Act**). The Privacy Act contains 13 *Australian Privacy Principles* (APPs) which regulate how we collect, use, disclose and keep your personal information secure.

Australian Ethical is committed to protecting your personal information.

By visiting our website, using any of our services and online platforms, or otherwise providing us with your personal information (or authorising it to be provided to us by someone else), you agree to your personal information being handled as set out in this Privacy Policy.

You may request a copy of this Privacy Policy in a particular form and we will take such steps as are reasonable in the circumstances to give you a copy in such form.

2. What types of personal information do we collect and why?

2.1 Personal and sensitive information

The personal information that we collect about depends on the products or services that you apply for, purchase, and/or enquire about.

We may collect and hold a variety of personal information, including the following:

- your name, gender, date of birth and residency information;
- contact details, such as your address, email address and telephone number(s);
- financial details, such as bank account details and your tax file number and where relevant, information about your other superannuation fund(s);
- employment details, such as occupation, salary, hours of work, employment dates or records of your or your employer's interactions with us; and/or
- information to verify your identity, such as your passport, driver's licence information or birth certificate.

We may also collect sensitive information about you if it is reasonably necessary to provide you with a specific product or service and you expressly consent to our collection of that information. Sensitive information includes criminal records (which we may obtain while undertaking Know Your Customer searches for certain products or where voluntarily provided by you), health information (which we may require to process an insurance claim) and information about your ethnic origin, political opinion, sexual orientation, or religious beliefs (which we may obtain voluntarily from you including via complaints and insurance claims). To the extent you provide us sensitive information voluntarily you consent to us collecting that sensitive information.

2.2 Tax file numbers

Under the *Superannuation Industry (Supervision) Act 1993*, Australian Ethical Super is authorised to collect, use and disclose your tax file number (**TFN**). Australian Ethical Super may disclose your TFN to another superannuation provider or when your benefits are being transferred, unless you request in writing that your TFN not be disclosed to any other superannuation provider. Declining to quote your TFN is not an offence. However, giving your TFN to your superannuation fund will have the following advantages:

- we will be able to accept all permitted types of contributions to your account(s);
- other than the tax that may ordinarily apply, you will not pay more tax than you need to - this affects both contributions to your superannuation and benefit payments when you start drawing down your superannuation benefits; and/or
- it will make it much easier to find different superannuation accounts in your name so that you receive all your superannuation benefits when you retire.

We are also required to ask for your TFN when you invest in Australian Ethical Managed Funds. If you do not provide your TFN you may be subject to additional tax on your earnings in Australian Ethical Managed Funds.

Due to the sensitivity of TFNs and the legal restraints on their use and disclosure, if you lose or forget your TFN, we will not be able to provide it to you. You will have to ask the Australian Taxation Office (**ATO**) for a copy of it.

2.3 Collecting your personal information

We will usually collect personal or sensitive information directly from you when you communicate with us, such as when you:

- engage with us, including through our website, online platforms and/or our products and services;
- provide us with personal information in connection with the provision or potential provision of services by us, such as completing a membership or product application form or a change of personal details form or any other related documentation (including via our online facilities);
- enquire or make a complaint about our services;
- subscribe to our mailing list or newsletters;
- contact us, register with, post to, like or follow any of our social media pages, forums or blogs;
- enter one of our competitions, promotions or giveaways or through a referral;
- register for, or attend, an Australian Ethical event or third party event arranged in conjunction with Australian Ethical (physically and/or virtually);
- apply for prospective employment and contracting opportunities at Australian Ethical; and
- participate in or engage with any surveys, market research, analytics, product testing and development by us or our third party service providers (in doing this, we may combine information we hold about you from various service providers and public sources).

From time to time we may collect personal or sensitive information about you indirectly and/or from third parties, such as:

- from your employers;
- from your agent or financial adviser;
- from your trustee;
- when we obtain information from your referees;
- through reports from professionals, such as medical professionals, or otherwise in connection with the provision of our services (including Know Your Customer checks);
- the ATO;
- other superannuation and insurance entities;
- clearing houses, gateway providers or similar entities;

- address-matching service providers to help us keep our records accurate and to locate other accounts in your name;
- service providers who conduct internet based surveys or run call centres;
- your spouse, family or friends (including where you're listed as their beneficiary for our products and services); and
- from publicly available sources.

2.4 Using your personal information

The purposes for which we collect, hold, use and disclose information may include the following :

- a. conducting our business, which includes providing our products and services, or the products and services of a third party, to you;
- b. establishing and administering your superannuation or pension account, including processing contributions from you or on your behalf, investing in accordance with your chosen investment strategy, providing an approved insured benefit, to help locate your lost super and to consolidate your super, regularly communicating with you about your account and paying benefits to you or your beneficiaries at the appropriate time;
- c. establishing and administering your managed fund account, including processing applications to purchase and redeem units on your behalf and regularly communicating with you about your account;
- d. administering and providing notifications regarding your shareholding;
- e. responding to your enquiries, including requests for information;
- f. complying with our legislative obligations, including customer identification and verification procedures required by the *Anti- Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) and any other applicable legislative requirements;
- g. where you have provided your TFN as set out in section 2.2 of this Policy, to locate or identify your superannuation and pension accounts, report to other regulated superannuation entities (when transferring your benefits to that entity), and to report to the ATO in relation to co-contributions, spouse contributions, and unclaimed monies;
- h. sending you relevant information on the products and services to which your membership gives you access or that you have signed up for;
- i. communicating with you and providing you with information relating to our business and our products and services;
- j. communicating with you about, and to process, Australian Ethical community grants applications;
- k. processing competition and promotion entries;
- l. processing employment applications during the recruitment process;
- m. carrying out analysis about our products and services and how we can improve and optimise them and our platforms (including our website and mobile applications); and
- n. for our internal administrative, research, planning, marketing and product development purposes.

2.5 What happens if you don't provide the information requested?

If you choose not to provide the personal information that we ask for, or the information that you provide to us is incomplete or inaccurate, we may be unable to provide you with the products and services you have requested, or offer you the full range of benefits that may be available to you.

2.6 Marketing

We (or our third party service providers) may send you direct marketing communications and information or advertising (including targeted advertisements) that we think will interest you, whether you are a current, prospective or former member. This might be via mail, email, telephone, SMS, MMS (multimedia messaging service) and apps or through other online media. If you provide us with a communication preference in the member portal, we will try to use that method wherever possible.

By providing us with your personal information, you consent to us and our third party service providers doing this on our behalf. If you do not want to receive marketing material from us, you can:

- contact us using the details provided below; or
- use the unsubscribe function on electronic communications or in your member portal.

Please note that you cannot opt out of communications that relate to the usage or operation of your account or disclosure or other documents that are required by legislation.

3. Who do we disclose personal information to and why?

3.1 The organisations and people we disclose personal information to

We will only disclose your personal information for the purposes for which it was collected, where we are required or authorised by law to do so, where you have expressly consented to such disclosure or your consent may be reasonably inferred from the circumstances.

We may share your personal information with other entities both within and outside of Australian Ethical and they may include:

- a. Australian Ethical's subsidiaries and related body corporates;
- b. your employer, for the purposes of updating or confirming the accuracy of our records and determining your superannuation benefits;
- c. medical practitioners, for the purposes of updating or confirming the accuracy of our records and determining any insurance benefits you may be entitled to;
- d. your potential beneficiaries, legal personal representative or estate in relation to a distribution of your superannuation account upon your death;
- e. your financial adviser or any other party authorised to act on your behalf;
- f. third parties as required by law, any courts or tribunals and/or any regulatory authorities including the ATO, the Australian Prudential Regulation Authority (**APRA**), the Australian Securities and Investments Commission (**ASIC**) and the Australian Transaction Reports and Analysis Centre (**AUSTRAC**); and
- g. our third party service providers who assist with our provision of services to you, including administrators, custodians and registries and any of their sub-contractors to administer your superannuation, pension or managed fund account, insurers, auditors, actuaries, legal advisors, superannuation clearing houses and gateway providers, marketing and communication agencies, market research, analytics and data services companies, mail houses, printing companies, archiving companies, IT service providers, web hosting companies and web developers.

Where your personal information is disclosed to service providers and other organisations, we seek to ensure that your personal information is handled in accordance with applicable privacy laws.

3.2 Disclosure of information overseas

We may disclose your personal information to entities located outside Australia in order to provide you the products and services you have requested and for our general business purposes. For example, in order to administer your superannuation and pension accounts, the company contracted by us to administer the Super Fund may use entities located in USA and India for aspects of fund administration. We may also use an external service provider based in the USA to deliver emails to you.

4. Storing and protecting your personal information

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

We collect and store your personal information in a combination of secure computer storage facilities (through a third party data storage provider) and paper-based files and records held in secure premises.

For example:

- a system of passwords and different levels of administration functionality is used to protect your personal information from access by unauthorised personnel; and
- your TFN is recorded in an encrypted form and destroyed when it is no longer required by law.

The personal information you provide to us is only retained for as long as necessary to fulfil the purposes for which the information was collected and in accordance with our business needs and legal obligations.

While we take reasonable precautions to secure your personal information, data protection measures are never completely secure and we cannot guarantee the security of your personal information. Our websites are linked to the internet and the internet is inherently insecure, so we cannot provide any assurance regarding the security of transmission of information you send to us online.

If you do not wish to transmit information via our websites, there are other ways in which you can provide us with your information, such as by mail or telephone.

5. Online

Our website may contain links to third parties' websites. Those other websites are not subject to this Privacy Policy and procedures. Once you leave our website, the guidelines of this Privacy Policy no longer apply. You will need to review those websites directly to view a copy of their privacy policies and to ensure your personal information is protected.

We may use a technology called 'cookies' when you visit our website which record information about your visit to our website. We may transmit usage information about visitors to our website to third party ad servers for the purpose of targeting our Internet banner advertisements on other websites. Our website provider may also log information about your browsing for statistical and analytical purposes as well as to customise your website experience. Unless required by a law enforcement agency, your details will not be used for identification purposes.

6. Accessing and correcting your personal information

We will take all reasonable steps to ensure any personal data we collect, use or disclose is up to date and accurate. If you believe personal information that we hold about you is not up to date or accurate, you may ask us to correct it. You can also independently change some of your personal information via our secure member and investor online facilities. You will need to provide proof of your identity before your information is corrected.

You may ask us to provide you with details of the personal information we hold about you, and copies of that information. We will respond to your request and attempt to provide you with the data within 30 days of receipt of your request.

If we provide you with copies of the information you have requested, to the extent permitted by law, we may charge you a reasonable fee to cover the administrative costs of providing you with that information.

Please direct all request for access and correction to privacy@australianethical.com.au

7. What do you need to do if you have a privacy complaint?

If you wish to make a complaint about a breach of the Privacy Act you can contact our Privacy Officer using the contact details below.

t 1800 021 227
e privacy@australianethical.com.au
a GPO Box 8, GPO Box Centre, Sydney NSW 2000

Your complaint must be in writing (letter or email) and include sufficient details regarding your complaint together with any supporting evidence.

If we receive a privacy complaint it will be treated seriously and dealt with promptly, in a confidential manner and in accordance with our internal complaints handling procedures. We will contact you if we require any additional information from you and after we have completed our enquiries and investigation, we will notify you in writing of the outcome and invite a response to that outcome.

If you are not satisfied with our response, we will review the matter. If you are still not satisfied with the outcome of a privacy complaint made to us, you can refer the matter to the Office of the Australian Information Commissioner using the details below.

Attention: Director of Compliance (Investigations)

t 1300 363 992
f 02 9284 9666
e enquiries@oaic.gov.au
a GPO Box 5218 Sydney NSW 2001

If you have a complaint regarding privacy issues relating to your investment in any of our products, , and it is not resolved by us to your satisfaction, you may refer your complaint to the Australian Financial Complaints Authority.

t 1800 931 678 (free call)

w www.afca.org.au

e info@afca.org.au

a GPO Box 3, Melbourne VIC 3001

8. Changes to this Privacy Policy

We will review and may update this Privacy Policy from time to time as needed without notice if the changes are not material. Therefore, you should review the terms of this Privacy Policy periodically to make sure that you are aware of how we collect, hold, store and use personal information. The date this policy was last updated will be set out at the start of the Privacy Policy.