

Morningstar Investment Management Australia Limited

Privacy Policy

Morningstar Investment Management Australia Limited
Level 36, Australia Square
264 George Street,
Sydney NSW 2000
Australia
ABN: 54 071 808 501
AFSL: 228986

This Privacy Policy was last updated on 1 December 2017

Your Privacy is Important

In this Privacy Policy:

- ▶ “Morningstar Investment Management”, “us” or “we” describes Morningstar Investment Management Australia Limited ABN: 54 071 808 501, AFSL: 228 986 a subsidiary of Morningstar Australasia Pty Limited (“Morningstar”), and
- ▶ “you” refers to any person or client about whom we collect or hold Personal Information.

We recognise that maintaining the privacy of your Personal Information matters to you, and are committed to protecting your Personal Information.

This Privacy Policy outlines how we collect, use, protect, and disclose your Personal Information. It also explains how you can access and have it amended, as well as who you can contact should you have an enquiry or complaint.

Morningstar has a separate Privacy Policy in relation to Job Applicants and Contractors. A copy of this policy is available upon request from the Privacy Officer or at www.corporate.morningstar.com/au

Definitions

Australian Privacy Principles (“APPs”) are part of the Privacy Act 1988 and regulate the way in which organisations may collect, use or disclose an individual’s Personal Information.

Personal Information means information or an opinion (whether or not true, and whether or not recorded) about an identified individual, or about an individual who is reasonably identifiable.

Personal Information that relates to an individual’s own characteristics, beliefs or affiliations is known as **‘sensitive information’** and will only be collected with your consent or when it is required by law and related information means information you provide which is not readily identifiable as being connected with you.

Personal Information We Collect

The types of Personal and related Information we collect from you will depend on the product or service you receive from us. We provide asset allocation, manager selection, portfolio construction and investment management services to both individuals and businesses.

The Personal Information we may collect from you includes, but is not limited to:

- ▶ Your name, phone number, street address and/or email address
- ▶ If you are acting on behalf of your employer, your job title, employer’s name and contact details
- ▶ If you are a Morningstar Investment Management Investor or a Morningstar Next Investor, your bank account details, TFN and, depending on your legal structure, Personal Information about trustees/beneficial owners or other information required by anti-money laundering legislation.
- ▶ Personal website usage information, including cookies and other information about your computer, device and browser.

Where our clients are corporations, we may collect Personal Information from that corporation or otherwise about different contact persons within the corporation including name, job title, and contact information.

We do not adopt Commonwealth Government identifiers, such as a tax file number or a Medicare number, as a means of identifying individuals.

Personal Information: Why We Collect It

We may collect, store, use and process Personal and related Information where necessary to provide you with our products or services or the products we distribute, to supply other administrative services (e.g. administering your account, fulfilling our obligations under anti-money laundering legislation), to respond to inquiries, and – unless you have let us know that you do not want us to do this – to provide information about other products and services that we, our related companies or our advertisers/marketing partners may offer from time to time (direct marketing), including via third party websites (remarketing).

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Personal Information: How We Collect It

We will collect Personal Information directly from you, unless it is unreasonable or impracticable to do so. The Personal Information and related information we collect may be captured from a variety of sources including, but not limited to:

- ▶ direct contact with us or use of our website
- ▶ voluntary submissions (e.g., responses to surveys, requests for information on our products or those of our advertisers/marketing partners)
- ▶ registrations/applications to receive our products or services or the products we distribute
- ▶ public registers (e.g. where we need to check Personal Information independently of you for anti-money laundering purposes)

While some contacts with us such as general enquiries may be made anonymously or by using a pseudonym, if the relationship is to progress any further (by you becoming our client or having a business relationship with us) it will be necessary for us to know who you are to enable us to deliver our services to you. Similarly, we cannot deal with complaints made anonymously or by pseudonym.

Where a third party gives us information about you

Should a third party give us unsolicited Personal Information about you, we will within a reasonable period determine whether or not we could have collected the information directly from you or if it is in a public record and, if not, we will take reasonable steps to destroy or de-identify that information unless the law otherwise permits or requires.

Use of and access to your Personal Information by others

Generally, we will not make the Personal Information gathered using our products and services available to anyone outside Morningstar Investment Management, Morningstar or its related companies - except as agreed or instructed by you or where required by or permitted by Law. Where we distribute a third party's products, we will provide any Personal Information you provide as part of the application process for the third party product to that third party.

Morningstar's related companies include our parent company Morningstar, Inc. in the United States and related companies worldwide. These related companies are located in: Belgium, Brazil, Canada, Chile, China, Denmark, Finland, France, Germany, Hong Kong, India, Italy, Japan, Luxembourg, Mexico, The Netherlands, New Zealand, Norway, Singapore, South Africa, South Korea, Spain, Sweden, Switzerland, Taiwan, Thailand and the United Kingdom.

It may be necessary for our third-party service providers to access and use your Personal Information in order to perform contractually specified services on our behalf. We will do everything reasonably within our power to prevent unauthorised use or disclosure of your Personal Information in such circumstances. Generally Morningstar contractually requires that all Personal Information accessed by such providers be kept confidential and in accordance with the APPs.

Use of cookies

A cookie is a small file which can be downloaded on a device when you access our website and is then sent back to our website each time you access our website. Cookies are useful because they allow us to recognise your device and your user preferences.

We use cookies to set users' preferences, gather basic tracking information (such as login and password, date, time of visit and preferences), and monitor the presentation of our site. This information allows us to personalise your experience and improve the quality of our site and our information on third party sites.

We also use analytical cookies, which allow us to recognise and count the number of users on our website and how users move around the site. This helps us make sure users can easily find what they need.

Tracking cookies are used to provide content that is relevant to your interests. Advertisers on our website may also deploy cookies and web beacon technology to measure and improve advertising for their clients.

You can control how cookies are used on your device by changing your browser settings. For further information go to <http://www.aboutcookies.org/how-to-control-cookies/>

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Please note some of our services may not function properly if your cookies are disabled. The use of cookies on our website or on other sites that use Morningstar Investment Management information does not identify you or provide access to your device.

Direct marketing

We may use your Personal Information for marketing and promotional purposes including to provide you with information about other products and services that we, or other Morningstar related companies or our advertisers/marketing partners, offer from time to time (direct marketing).

You have the right to ask us to let you know the source of your Personal Information where it is used by us for direct marketing. So long as a response is not impracticable or unreasonable, we will reply to you within a reasonable period without cost to you.

If you do not want your Personal Information used for direct marketing purposes by us or our related companies or our advertisers/marketing partners, please contact our Privacy Officer on +61 2 9276-4532 or email: auprivacy@morningstar.com

Remarketing

We may also use your Personal Information to advertise our services to you when you visit other websites that have the necessary functionality. Morningstar and our service providers such as Google use cookies to show advertisements relevant to your past usage of our website.

You can control cookies on your device as mentioned above or opt out of cookies on the Network Advertising Initiative opt-out page.

If you have any problems, contact our Privacy Officer on +61 2 9276-4532 or email: auprivacy@morningstar.com

Links to Other Websites

Our website may contain links to other websites for you to access. You should be aware that the privacy policies of the operators of those other sites may not be the same as ours and you should refer to their own privacy policies.

Protection of Your Personal Information

We will take all reasonable steps to ensure that any Personal Information about you which we hold is:

- a) **Secure:** protected from misuse, interference and loss and from unauthorised access, modification or disclosure; and
- b) **Appropriate:** accurate, complete, up-to-date, relevant and not misleading having regard to the purpose for which it is held.

Your Personal Information may be kept in various formats by us, our related companies and relevant third party providers.

The Morningstar Group operates secure data networks protected by industry standard firewalls and have password protection systems. Our security and privacy policies are periodically reviewed and enhanced as necessary and only authorized individuals have access to the information provided

We restrict access to Personal Information to our employees, and contracted third party providers who need to know that information in order to process it for us and who are subject to strict contractual confidentiality obligations. They may be disciplined or their contract terminated if they fail to meet these obligations.

We may need to maintain records for a significant period of time but will destroy or de-identify Personal Information if we no longer need it for any authorised purpose and are not required by law to retain it.

Access to Your Personal Information

We will handle all requests for access in accordance with the APPs.

In most cases, we will confirm whether or not we hold Personal Information about you and give you access to any such Personal Information within a reasonable period of time and in the manner you request, provided that request is reasonable.

In some cases, we may refuse access where refusal is required or permitted by law. Without limitation, we may reject requests that are unreasonably repetitive,

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require disproportionate technical effort (for example, information that is only available on older back up tapes, or would involve developing a new system or significantly changing an existing practice), or which risk the privacy of others. We will provide you with reasons for any refusal.

We will respond to your request within a reasonable period of time and in accordance with legal requirements.

We may charge a reasonable fee for giving you access to your Personal Information, however at present we do not propose to make any such charge.

To request access to your Personal Information please contact our Privacy Officer – contact detail are below.

Accuracy of Your Personal Information

We appreciate any assistance you might give us to keep any Personal Information that we hold about you up to date, complete and accurate. If you want to update your Personal Information, you may do so by contacting:

Morningstar Investment Management Investors
Investor Services Team on +61 2 9276 4550 or
investor.services@morningstarinvestments.com.au

Morningstar Next Investors
Client Support on 1800 316 544 or
support@morningstar.com.au

We will, on request, normally amend any of your Personal Information which is inaccurate, incomplete, out-of-date, irrelevant or misleading where:

- ▶ we are satisfied that the information needs to be corrected; and/or
- ▶ we agree with your request that the information be corrected.

If we disagree with your request, we will write to inform you of our concerns about making the change you have requested, giving reasons for our refusal and notifying you of available complaint mechanisms.

If you wish, we will then, take reasonable steps to associate with the appropriate records of your Personal Information, a statement that you claim the information is inaccurate, incomplete or out-of- date (whichever is relevant) and that you have requested a particular change.

We will respond to your request within a reasonable period of time and in accordance with legal requirements. We will inform you of any action taken as a result of your request.

Where permitted by law we may charge a reasonable fee for dealing with requests, but do not propose to do so at present.

Complaint Process

If you have a complaint about how we handle your Personal Information, please contact our Privacy Officer as described below.

The Privacy Officer will acknowledge your complaint within three business days of receipt and will seek to resolve your complaint within 20 days of receipt.

Morningstar Privacy Officer Contact Details

Privacy Officer

Morningstar Australasia
Level 36, Australia Square
264 George Street
Sydney, NSW 2000, Australia

Phone: +61 2 9276 4532

Facsimile: +61 2 9276 4545

Email: auprivacy@morningstar.com

If your complaint is not resolved to your satisfaction you have the right to contact the Financial Ombudsman Service (FOS). FOS is an external dispute resolution scheme authorised to deal with complaints in relation to the financial services industry including privacy.

The Financial Ombudsman Service
GPO Box 3
Melbourne VIC 3001

Phone: 1800 367 287

Email: info@fos.org.au

Website: www.fos.org.au

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If you are still not satisfied with the outcome you can contact:

Office of the Australian Information Commissioner
GPO Box 5218
Sydney NSW 2001

Phone: 1300 363 992
Email: enquiries@oaic.gov.au
Facsimile: +61 2 9284 9666

Copies of This Policy and Further Information

If you wish to obtain a free copy of our privacy policy (by post or email) and/or more information about the way that we handle your Personal Information, contact our Privacy Officer.

Your Consent

By using Morningstar Investment Management's products and services or products we distribute, you consent to the collection and use of any Personal Information and

any related information in the manner described in this Privacy Policy.

Changes to the Privacy Policy

As the Federal Government introduces new privacy legislation, this Policy will be reviewed and updated accordingly. We will also regularly review this Policy and may change it from time to time.

The date at which this Policy was most recently updated is given above.

Interpretation

If at any time (for example because of changes to legislation) this Privacy Policy is not consistent with applicable privacy legislation, the legislation overrides this Policy to the extent of the inconsistency.

Further Information

More information on privacy legislation is available from the Office of the Australian Information Commissioner at www.oaic.gov.au