

LINK GROUP

For all subsidiaries of the Link Group
in Australia

Privacy Policy



Table of Contents

1. INTRODUCTION	3
2. PURPOSE.....	3
3. SCOPE.....	3
4. TYPES OF INFORMATION COLLECTED AND HELD	4
5. HOW DOES LINK GROUP COLLECT YOUR PERSONAL INFORMATION SCOPE	5
6. WHAT HAPPENS IF LINK GROUP IS UNABLE TO COLLECT YOUR PERSONAL INFORMATION?	6
7. WHY DOES LINK GROUP COLLECT, HOLD, USE AND DISCLOSE YOUR PERSONAL INFORMATION?	6
8. SECURITY OF YOUR INFORMATION	7
9. LINKS TO THIRD PARTY WEBSITES	8
10. WHO DOES LINK GROUP DISCLOSE YOUR PERSONAL INFORMATION TO?	8
11. DIRECT MARKETING MATERIALS.....	9
12. DOES LINK GROUP DISCLOSE YOUR PERSONAL INFORMATION TO ANYONE OUTSIDE AUSTRALIA?	9
13. HOW CAN YOU ACCESS AND CORRECT YOUR PERSONAL INFORMATION?	10
14. ENQUIRIES AND COMPLAINTS	10
15. CHANGES TO LINK GROUP'S PRIVACY POLICY	11

1. Introduction

In the conduct of its business, Link Group necessarily seeks, records, uses and discloses personal information about individuals.

Link Group entities operating in Australia are therefore subject to the *Privacy Act 1988* (Cth) (*Privacy Act*), which regulates how personal information is handled.

The Privacy Act defines personal information as:

“...information or an opinion (including information or an opinion forming part of a database), 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.”¹

Quite apart from the law, appropriate management and protection of personal information is important for the safety and security of the individual to whom the information belongs, and for Link Group to be able to carry on its business.

This document explains how Link Group manages personal information, including regulatory obligations and the rights of individuals.

2. Purpose

The purpose of this policy is to record Link Group management's commitment to privacy and its expectation of how personal information will be handled.

This policy does not detail actual processes, practices, procedures and systems adopted. Rather, it sets out the general principles to be interpreted and applied in the conduct of Link Group's businesses as the standing, overriding directive from management.

3. Scope

This policy applies to any and all persons, corporate or natural, whether employed, contracted or otherwise associated with Link Group and/or its subsidiaries. It is not a stand-alone document and is supported by the Risk Management and Compliance frameworks, including operational policies, procedures and processes.

Third party service providers may give effect to their own Privacy Policy, but in any event, must act in compliance with the Australian Privacy Act at all times.

¹ Section 6 of the *Privacy Act 1988* (Cth)

4. Types of information collected and held

In the valid discharge of its functions, Link Group may collect and/or hold the following types of information:

- Personal information;
- Sensitive information;

These are explained in more detail below.

4.1 Personal Information

- name;
- age or date of birth;
- marital status;
- mailing and/or street address;
- email address;
- telephone number;
- profession, occupation or job title;
- superannuation details (including tax file number and beneficiary details);
- insurance details (relating to superannuation and pensions);
- banking details;
- details of the services an individual has acquired from Link Group or its clients or which an individual has enquired about, together with any information necessary to deliver those services and to respond to enquiries;
- any additional information, relating to an individual, provided to Link Group directly or indirectly through Link Group websites or online presence or through Link Group representatives;
- information provided to Link Group through its service centres, meetings with Link Group representatives or customer surveys; and
- Information related to foreign tax residency status²

Link Group may also collect personal information from individuals seeking employment with Link Group (including contractors and temporary staff) relating to their suitability as an employee, including:

- references from previous employers;
- employment suitability information obtained from recruitment agencies or related entities acting on Link Group's behalf;
- information from law enforcement agencies, including whether or not the individual has a criminal record;
- information from other government entities or third party companies, such as organisations that conduct competency or psychometric tests; and

² Only if, and insofar as is, relevant and necessary for the provision of contracted or requested services.

- educational or vocational organisations to the extent necessary to verify your qualifications.

Link Group may collect information that is not personal information, because it does not identify you or anyone else such as anonymous answers to surveys or aggregated information about how users utilise Link Group websites.

4.2 Sensitive Information

Less commonly, but where necessary for the provision of a service or compliance with the lawful authority, Link Group may also collect sensitive information including, but not limited to:

- Health information;
- Immigration status;
- Membership of a trade association and/or trade union; and
- Details published in Politically Exposed Person (*PEP*) lists, criminal watch lists, United Nations Sanctions lists and the Department of Foreign Affairs and Trade lists (for Anti-Money Laundering Counter-Terrorism Financing and Autonomous Sanctions purposes).

5. How does Link Group collect your personal information Scope

Link Group collects personal information directly from you, or your authorised representative, unless it is unreasonable or impracticable to do so. Link Group may collect personal information:

- through your access to, and use of, Link Group websites;
- during conversations between you and Link Group's representatives;
- from written requests, including email;
- when you complete an application, either on line or hard copy, regarding any of the services or opportunities included in Link Group's websites; or
- through your provision of identity documents such as drivers' licence, passport, utility bills etc for the purpose of verifying your identity.

Link Group may also collect personal information from third parties including:

- your employer;
- your superannuation fund, for which Link Group acts as administrator;
- government agencies or regulators;
- securities brokers;
- companies, managed investment schemes and other entities whose registers Link Group maintains;
- other service providers;
- publicly available sources; or
- list purchasers.

Link Group will only collect sensitive information about a person with the consent of the individual, except where Link Group is required or permitted by law to collect sensitive information without consent.

6. What happens if Link Group is unable to collect your personal information?

If you do not provide Link Group with the personal or sensitive information described above, some or all of the following may happen:

- Link Group may not be able to provide services to you, either to the same standard or at all;
- we may not be able to provide you information that you may want, including information about services or special promotions;
- we may not be able to tailor the content of our websites to your preferences and your experience of Link Group's websites may not be as positive or useful to you;
- we may not be able to offer you employment with Link Group; and
- you may be subject to additional taxation or your assets or entitlements could be transferred to ASIC, the ATO or to state revenue offices.

7. Why does Link Group collect, hold, use and disclose your personal information?

Link Group collects personal information about you necessary to be able to provide services to you for the following purposes:

- send you communications;
- to update records and keep your contact (and other) details up-to-date;
- to answer your enquiries and provide information or advice about existing and new services;
- to process and respond to any complaints you may make;
- to provide you with access to protected areas of our websites;
- to assess the performance and improve the operation of their websites;
- to conduct processing functions including providing new and updated personal information to our related bodies corporate, contractors, service providers or other third parties;
- for the administration, marketing (including direct marketing), product or service development, quality control and research, as required by Link Group and our related bodies corporate, contractors or service providers;

- to meet legal obligations under the Common Reporting Standard (CRS), the Foreign Account Tax Compliance Act³, Anti-Money Laundering and Counter-Terrorism Financing Act and the Autonomous Sanctions Act; and
- to comply with any other law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or where a government authority makes recommendations that are not mandatory but which we elect to follow.

Link Group will not share, sell, rent or disclose your personal information other than as described in this privacy policy.

7.1 Dealing with unsolicited personal Information

Generally, most information received by Link Group is immediately and automatically recorded (i.e. most telephone calls are electronically recorded and most documents received are scanned into an electronic image.) This is necessary because Link Group is a trusted third party record keeper, providing technical, administrative, support and/or financial services involving day-to-day money and security asset movements, where imprecise record keeping may have significant adverse consequences.

Where it becomes apparent that a communication contains unsolicited personal information that could not otherwise lawfully be requested or used, Link Group will make reasonable efforts to delete, destroy or de-identify the record. Where it is impracticable to do this (for example, the unsolicited information is combined with necessary information), the record will be retained, subject to the safeguards detailed in this privacy policy.

8. Security of your information

Link Group will take all reasonable steps to ensure your personal information is protected from misuse, loss and unauthorised access, modification or disclosure in accordance with statutory requirements. This includes having security measures and controls in place to protect personal information including limiting access, cryptography, physical and environmental security and audit monitoring.

Link Group may hold your information in either electronic or hard copy form, and will destroy or de-identify personal information when it is no longer required or when Link Group are no longer required by law to retain it (whichever is the later).

As Link Group websites are grouped to the internet, which is inherently insecure, Link Group cannot:

- provide any assurance regarding the security of transmission of information you communicate to us online; or
- guarantee the information you supply will not be intercepted while being transmitted over the internet.

³ Where submitting information to the Link Investor Centre, this includes the use of your personal information by Link Market Services Limited where necessary, the transfer of that information to a relevant issuer or broker or to the extent required by law, to any government department or authority.

Accordingly, any personal or other information which you transmit to Link Group online is transmitted at your own risk.

9. Links to third party websites

Link Group's websites may contain links to other websites operated by third parties. Link Group cannot, and does not, make any representations or warranties in relation to the privacy practices of any third party website and is not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing relevant individuals about their own privacy practices.

10. Who does Link Group disclose your personal information to?

Personal information held by Link Group will only be used for purposes directly related to one or more legitimate functions or activities of Link Group in the provision of its services or as otherwise permitted by lawful authority. Link Group does not sell personal information.

Link Group may disclose your personal information to:

- our employees;
- superannuation funds under Link Group's contracts of administration, or issuers of securities for whom we are contracted to provide registry or other services;
- security issuers under Link Group contracts to provide registry services;
- contractors or service providers, for the purposes of the operation of Link Group's business or websites;
- third parties, in order to fulfil requests by you, and to otherwise provide services to you (e.g. insurers and identity verification)
- IT systems administrators, web hosting providers, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors;
- professional advisors such as accountants, solicitors, business advisors and consultants;
- suppliers and other third parties with whom Link Group has a commercial relationship, for business, marketing, and related purposes;
- government organisations with statutory responsibility to regulate various areas of our business operations;
- law enforcement agencies; and
- any organisation for any authorised purpose with your consent.

In some cases, Link Group may also be required to disclose your personal information without your consent. Specific instances include where:

- required or authorised by law. For example, where an entity is subject to a statutory requirement to report certain matters to an agency or enforcement body; or
- a warrant or notice issued by a court requires Link Group to produce records or documents they hold.

From time to time, your personal information may also be disclosed to an overseas recipient as described in section 12 of this policy.

11. Direct marketing materials

Link Group may send you direct marketing communications and information about its services or those of its clients that Link Group considers may be of interest to you. These communications may be sent by mail, SMS, fax and email, in accordance with applicable marketing laws, such as the *Spam Act 2003 (Cth)*. If you indicate a preference for a method of communication, Link Group will endeavor to use that method whenever practical to do so. In addition, at any time you may opt-out of receiving marketing communications from Link Group by:

- contacting us (see details below), or
- using opt-out facilities provided in marketing communications,

and Link Group will then take all reasonable steps to remove your name from the mailing list.

Link Group does not provide your personal information to any other organisations for the purposes of direct marketing.

12. Does Link Group disclose your personal information to anyone outside Australia?

As part of providing services to you and in Link Group's capacity as a service provider, occasionally personal information may be stored or processed at locations outside Australia.

Link Group may disclose personal information to corporate and third party suppliers, service providers and regulators located overseas for some of the purposes listed in section 10 above.

Link Group takes all reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations (including the Australian Privacy Principles) relating to your personal information.

Link Group may disclose your personal information to entities located outside of Australia, including to data hosting organisations, IT service providers, and other third party vendor/suppliers that are located overseas. At the date of this policy, the countries that Link Group discloses information to include: Canada, China (Hong Kong), France, Germany, India, Luxembourg, New Zealand, Papua New Guinea, South Africa, Switzerland, the Philippines, the United Kingdom, the United States of America, and United Arab Emirates.

13. How can you access and correct your personal information?

You may request access to any personal information Link Group holds about you at any time by contacting us (see the details below). Where we hold information that you are entitled to access, we will try to provide you with a suitable means of accessing it (for example, by mailing or emailing it to you). We may charge you a reasonable fee to cover our administrative and other reasonable costs in providing the information to you. We will not charge you for simply making the request nor charge you for making any corrections to your personal information.

There may be instances where Link Group cannot grant you access to the personal information it holds, for example, if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality or a breach of legislation. If that happens, we will generally give you written reasons for any refusal.

If you believe that personal information Link Group holds about you is incorrect, incomplete or inaccurate, then you may ask us to amend that information. We will then consider if the information requires amendment. If we do not agree that there are grounds for amendment then we will add a note to the personal information stating that you disagree with it.

14. Enquiries and complaints

Link Group has an established internal dispute resolution system in place to efficiently manage enquiries and complaints. We encourage individuals wishing to make enquiries or lodge a complaint about how Link Group handles personal information to do so. At first instance, your enquiry or complaint should be addressed to Link Group directly, via:

Telephone: + 61 1800 502 355 (free call within Australia)
9am–5pm (Sydney time), Monday to Friday (excluding public holidays),

or

in writing, addressed to the Privacy Officer at:

Email: privacy.officer@Linkgroup.com;

or

Post: Attn: Privacy Officer
Link Group
Locked Bag A14
Sydney South NSW 1235

If Link Group fails to respond to your complaint within thirty days, or you are not happy with our response, you may be able to refer your complaint to the Office of the Australian Information Commissioner (www.oaic.gov.au) who can be contacted by phoning 1300 363 992 or emailing enquiries@oaic.gov.au.



15. Changes to Link Group's privacy policy

Link Group may change this privacy policy from time to time. Any updated versions will be published on our websites and will be effective from the date of posting.