

## **Privacy Policy**

Adoption: March 11, 2014

Last Revision: October 4, 2018

**GMO Australia Limited<sup>1</sup>**

GMO Australia Limited ACN 071 502 639 (**GMO Australia, we, us, or our**) recognises the importance of protecting your privacy.

This Privacy Policy describes how we collect, use, hold and disclose personal information that you provide or is collected by us. It describes how we comply with the requirements of the Privacy Act 1988 (Cth) (**Privacy Act**), including the Australian Privacy Principles.

If you do not consent to the collection, holding, use and disclosure of your personal information in accordance with this Privacy Policy, we may not be able to provide you with the products and services that you require.

We reserve the right, at our discretion, to modify or remove any part of this Privacy Policy at any time. You should review our Privacy Policy periodically so that you are updated on any changes. You can obtain a copy of our Privacy Policy free of charge by contacting us using the Privacy Officer contact details set out below.

Our parent company, Grantham, Mayo, Van Otterloo & Co. LLC (**GMO**), also has a privacy policy which covers GMO and certain of its affiliates. A copy of GMO's privacy policy is available free of charge by contacting us using the Privacy Officer contact details set out below.

This Privacy Policy uses the terms "personal information" and "sensitive information" which are defined in the Privacy Act.

### ***What Personal Information Do We Collect and Why?***

The kinds of personal information that we may collect include your:

- contact details, such as name, address, email address and telephone numbers;
- date of birth;
- occupation;
- bank account information;
- tax file number;
- investment information; and
- employment information.

We may also collect other information used to identify you, your financial position, or that is relevant to our functions or activities.

We usually collect personal information from:

- account applications and other forms;

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<sup>1</sup> ABN 30 071 502 639  
AFSL No: 236 656

- account history, which may include information about the transactions and balances in accounts with us; and
- correspondence, which may include written, telephone or electronic communications.

In some circumstances, we may collect personal information about you from a third party or from publicly available information. The third parties from whom we may acquire personal information may include our affiliates, your adviser, consultant or agent and our service providers, which have been engaged by us to perform the processing and administration of accounts (including applications) on our behalf.

We only collect, hold, use and disclose personal information for purposes related to our functions or activities, including to:

- provide you with information or assistance that you request from us;
- inform you about our investment products or services;
- provide you with our investment products or services;
- notify you about changes to our investment products and services;
- monitor and improve the quality of our investment products and services;
- process and administer your investments with us;
- inform you of future investment opportunities; and
- comply with legal and regulatory requirements, and for other purposes of interest to our customers.

If we do not collect this personal information, we may not be able to provide you with the products, services or assistance that you request.

If we use your personal information for the purposes of direct marketing, we will give you the opportunity to request that your information not be used for future direct marketing.

Sensitive information will only be collected about you with your consent or as otherwise permitted by law.

### ***How Do We Hold, Use, and Disclose Personal Information?***

Your personal information and any documents containing your personal information are held in a secure environment. We maintain physical, electronic and procedural safeguards and security measures which are reasonably designed to protect your personal information.

We may disclose your personal information to the following third parties:

- affiliated companies of GMO Australia (including GMO and its affiliates);
- our staff for the purposes of their work responsibilities;
- third parties engaged by us to perform functions or activities on our behalf;
- third parties as necessary to complete certain transactions or account changes that you direct; and
- regulators or government authorities as required to comply with our legal and regulatory requirements.

The affiliated companies and third parties to whom your personal information may be disclosed may be located outside Australia (including, but not limited to, the United States of America,

United Kingdom and Singapore), in which case the laws of those overseas jurisdictions may apply a greater or lesser standard of protection for your personal information. By investing in one of our products, you consent to your personal information being disclosed overseas for the purposes set out in this Privacy Policy.

In addition, we are permitted to use or disclose your personal information:

- where you have consented to the use or disclosure; or
- otherwise as specifically provided for by the Privacy Act.

### **Security**

We have security measures in place designed to protect your personal information that we hold from misuse, interference and loss, and from unauthorised access, modification or disclosure. However, we will not be responsible for any breach of security caused by third parties.

### **Accessing and Correcting Personal Information Held By Us**

You may access the personal information we hold about you, and you may make or seek changes to that information, by contacting us using the Privacy Officer contact details set out below.

Our Privacy Officer will promptly investigate your privacy enquiry and provide you with answers or update our records, as appropriate. We may charge a reasonable fee for access to your personal information.

### **Complaints**

You may make a complaint about an alleged breach by us of the Privacy Act in relation to our handling of your personal information. Your complaint should be in writing and provided to us using the Privacy Officer contact details set out below. We will endeavour to respond to a complaint within 30 days.

If you are not satisfied with our response to a complaint, you may lodge a complaint with the Australian Financial Complaints Authority:

Australian Financial Complaints Authority

Address: GPO Box 3  
Melbourne VIC 3001  
Telephone: 1800 931 678  
Website: [www.afca.org.au](http://www.afca.org.au)  
Email: [info@afca.org.au](mailto:info@afca.org.au)

If you remain dissatisfied with the outcome of a complaint following its determination by the Australian Financial Complaints Authority, you may lodge a complaint with the Office of the Australian Information Commissioner.

### ***How to contact us***

For questions about our Privacy Policy, to access your personal information held by us, to request correction of such personal information or to make a complaint or enquiry, please contact our Privacy Officer at:

Address: Suite 43.02, Grosvenor Place  
225 George Street  
Sydney NSW 2000, Australia

Telephone: (612) 8274 9927

Email: [PrivacyOfficerAustralia@gmo.com](mailto:PrivacyOfficerAustralia@gmo.com)