

# Privacy Policy

Protection of your personal and possibly sensitive information is important to Lonsec Research Pty Ltd and Lonsec Holdings Pty Ltd (Lonsec Group), and is required by law.

Under the Privacy Act 1988 (Cwth) and all related legislation and regulations, the Commonwealth Government regulates the way in which private sector organisations collect, use, disclose and disseminate, keep secure and provide access to personal information. As a private sector organisation we are required to protect your personal information in accordance with the privacy legislations and regulations.

This Privacy Policy outlines how we manage your personal information. It also sets out the types of personal information that we keep and for what purposes and how that information is collected, retained, used and disclosed.

## Collecting Your Personal Information

Our business is to provide in-depth investigative research and insights by way of published reports, sector reviews and forward and backward looking commentary across a broad range of sectors within the financial services industry.

Specifically, these are:

- traditional managed funds
- alternatives such as hedge funds
- structured products
- direct assets such as property and infrastructure investments
- Exchange Traded Funds
- Separately Managed Accounts — portfolios and platforms

Lonsec Investment Consulting leverages this intelligence to provide:

- model portfolios
- asset allocation advice
- retirement advice
- capability reviews to fund managers
- tailored services to dealer groups.

Our reports and related information are available by subscription to our website. ([irate.lonsec.com.au](http://irate.lonsec.com.au))

The personal information we collect is required for two reasons. The first is when we prepare our reports, reviews or commentaries we will consider the senior management of the fund or entity under review. We will receive on a voluntary basis personal information of senior management consisting of names, academic qualifications, work experience and current position held. This information may be set out in the published information available on our website. We hold this information on our website for a period of between 12 to 18 months depending on the life of the report, review or commentary.

Secondly, in order to access our website we will require that an individual provide us with their name, email address and a telephone number, notwithstanding the subscriber may be a company or other form of legal entity.

Access to our website is also dependent on payment of the access fee.

If we are not given the individual contact details or receive payment then we cannot allow access to our website.

## Using and Disclosing of Your Personal Information

Personal information may be used to:

- assist you to subscribe to our services;
- provide the services you require;
- administer and manage those services, including charging, billing and collecting debts;
- conduct appropriate identity checks for client services provided to you;
- gain an understanding of your information and communication needs in order for us to provide you with a better service; and
- maintain and develop our business systems and infrastructure, including testing and upgrading of these systems.

Common to modern business practices and to meet your specific needs we may disclose your personal information to the organisations and people described below. Where your personal information is disclosed we will seek to ensure that the information is held, used or disclosed consistently with the applicable privacy laws, regulations and codes.

In order to deliver the services you require, we may disclose your personal information to organisations outside of Lonsec Research Pty Ltd. Your personal information is disclosed to these organisations only in relation to us providing our services to you.

The relevant organisations and people for disclosure purposes are:

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- as required or authorised by law and regulations, for example, to government or regulatory bodies for purposes related to public health or safety, the prevention or detection of unlawful activities or to protect public revenue.

### Disclosure of Personal Information to Foreign Persons or Organisations

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Web-based services and products can be accessed through the internet regardless of your location. However, your information is stored by Lonsec Research Pty Ltd which is based in Australia. Lonsec Research Pty Ltd does not anticipate that it will disclose your personal information to any foreign person or entity unless required to do so by law.

### Your Privacy on The Internet

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#### Our website

We take care to ensure that the personal information you give us on our website is protected.

#### Use of cookies

Like most websites, our website may use cookies to improve the functionality of our website. When you visit our website, details about your visit, such as time and date, pages accessed duration of visit and type of browser, may be recorded. This information is collected for statistical purposes and can also identify you individually. If you do not wish to receive cookies, you can change the settings of your browser to refuse all cookies or to notify you each time a cookie is sent to your computer, giving you the choice of whether to accept it or not.

#### Links to other websites

You may be able to access an external web-site(s) by clicking on links we have provided. The other website(s) is not subject to our privacy standards, policies and procedures. You will need to contact or review that web-site directly to ascertain their privacy standards, policies and procedures.

### Gaining Access to Your Personal Information

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You can gain access to your personal information. This is subject to some exceptions allowed by law and regulation. Factors affecting a right to access include:

- access would pose a serious threat to the life or health of any individual;
- access would have an unreasonable impact on the privacy of others;
- the access request is frivolous or vexatious;
- the information relates to a commercially sensitive decision making process;
- access would be unlawful;

- access would prejudice enforcement activities relating to criminal activities and other breaches of law, public
- revenue, a security function or negotiations with you; or
- legal dispute resolution proceedings.

If denying you access is required by relevant law and regulation, we will give you reasons for the denial of access to your personal information.

Contact us through the address and telephone number set out below, to obtain a form requesting access to your personal information. In some cases we may be able to deal with your access request over the telephone.

### Dealing With Us Anonymously

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You cannot deal with us anonymously unless you specifically request it, it is practicable to do so and it is not against relevant legislation and regulation.

### Your Sensitive Information

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Sensitive information about you is information that reveals amongst other things, your racial or ethnic origin, political opinions, religious or philosophical beliefs or affiliations, membership of a professional or trade association, membership of a trade union, details of health, disability, sexual orientation, or criminal record. In order to access our services, you will not be required to provide sensitive information.

### The Collection Is Required by Law

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This will occur when the information is necessary for the establishment, exercise or defence of a legal claim.

### Data Quality and Accuracy

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We will take reasonable steps to ensure that your personal information is accurate, complete and up to date.

If you become aware, or believe that any personal information which we hold about you is inaccurate, incomplete or outdated, you may contact us with evidence that the information is inaccurate, incomplete or out of date. If we agree that your personal information requires correcting, we will take all reasonable steps to correct it.

If we do not agree that your personal information requires correcting, you will be provided with reasons for the refusal.

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## **Transfer of Personal Information**

The personal information that we request from a subscriber is uploaded to and kept on servers that are maintained by Lonsec Research Pty Ltd or that are maintained by third parties that must meet our strict contractual privacy requirements.

## **Complaints**

If you have any complaints about a breach or potential breach of this Privacy Policy, please contact our Privacy Officer on (03) 9623 6300 or by email: [privacy@lonsec.com.au](mailto:privacy@lonsec.com.au)

It is our aim to respond to your complaint within 7 days and resolve your complaint quickly and fairly. If the complaint is not resolved to your satisfaction, you can refer the matter to the office of the Privacy Commissioner at:

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

## **Date**

This Privacy Policy was updated 19 January 2018 and is subject to ongoing review.