

Privacy Policy

Clearstream Australia Limited

October 2021

Privacy Policy

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1. Introduction

Clearstream Australia Limited ("CAL") recognises the importance of the personal information we hold about individuals and the trust they place in us. Although CAL does not deal directly with retail clients and only interacts with them through its institutional clients, CAL collects and holds certain personal information of underlying investors as part of its services provided and products offered.

CAL further collects information of business partners and their representatives, suppliers, applicants for roles, potential candidates and their referees.

The policy covers Clearstream Australia Limited ACN 062 527 575.

2. Respecting your Privacy

By explaining our Privacy Policy to you, we hope that you will better understand how we collect and hold your personal information private and secure while using it to provide services and products or during the normal course of running our business.

We are committed to safeguarding your personal information in accordance with the requirements of the Australian Privacy Principles of the Privacy Act 1988. In general, we will not use or disclose such information collected about you otherwise than for the purposes set out in this Policy, for a purpose you would reasonably expect, a purpose required or permitted by law, or a purpose otherwise disclosed to, or authorised by you directly or via our institutional clients.

3. Personal Information

3.1 What is Personal Information

Personal Information is information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- whether the information or opinion is true or not; and
- whether the information or opinion is recorded in a material form or not.

3.2 Kinds of Personal Information we collect and hold

The kind of Personal Information we may collect and hold about you generally includes:

- identification information such as your name, postal or email address, telephone numbers, date of birth, gender, nationality and residency status;
- tax file number;
- information contained in an identity document, such as a passport number and drivers licence number;
- information necessary to make or receive payments to or from you or necessary to effect security transactions on your behalf;
- employment and education history; or
- resume and other correspondence.

In certain circumstances, we may also collect Personal Information which is sensitive. This may include information about your:

- racial or ethnic origin;
- political opinion or membership of political association;
- religious or philosophical beliefs;
- membership of professional or trade associations or trade union; and
- criminal record.

4. Collection of your Personal Information

4.1 When the law authorises or requires us to collect information

We may collect information about you directly from you or via our institutional clients because we are required or authorised by law to collect it. There are laws that affect financial institutions, including company and tax law, which require us to collect personal information. For example, we require personal information to verify your identity under the Australian Anti-Money Laundering law.

4.2 How we collect Personal Information

We will collect Personal Information directly from you or via our institutional clients where:

- we update your Personal Information via our institutional clients;
- we need the information for identity validation or verification purposes;
- you deal with us as a key contact or employee of an institutional client;
- you deal with us as a key contact or employee of a non-client relationship such as vendors; or
- you fill out an application form, apply for a role with us directly or via a third-party website.

On occasions, we may need to collect Personal Information about you from third parties. This may include, but is not limited to:

- where an institutional client has applied for a product or a service and the details of the institutional client's officeholders, account signatories and/ or beneficiaries are provided to us by the individual applying on behalf of the institutional client;
- our agent and service providers which may be located overseas;
- law enforcement, statutory and regulatory bodies;
- publicly available sources including the Internet and telephone directories;
- industry databases; and
- marketing organisation including through the use of purchased lists.

Unless the collection of sensitive information is required or permitted by or under law, we will obtain your consent to its collection from you or via our institutional clients.

5. Security of your Personal Information

5.1 Where we hold your Personal Information

Your Personal Information may be held within our (or our service providers'):

- premises in paper records;
- computer systems including email, servers, hard drives and applications; and
- data storage systems.

5.2 Security of Personal Information

CAL will take reasonable steps to protect the Personal Information it holds from interference, misuse and loss and from unauthorised access, modification or disclosure. Some of the ways we do this are:

- confidentiality requirements and privacy training of our employees;
- security measures to control access to our systems and premises;
- in line with our internal authorisation and access policies, employees only have access to information on a need to know basis;
- ensuring third parties we appoint as our contractors or agents, including those located overseas, meet our privacy obligations;
- electronic security systems, such as firewalls and data encryption on our websites.

We can store personal information physically or electronically with third party data storage providers. Where we do this, we use contractual arrangements to ensure those providers take appropriate measures to protect that information and restrict the uses to which they can put that information.

To the extent permitted by law, we will take reasonable steps that your Personal Information is destroyed, permanently de-identified or rendered inaccessible if it is no longer needed for any purpose for which the information may be used and disclosed under this Policy.

5.3 Notifiable Data Breaches

In the event of a data breach, we will conduct an assessment to identify whether the data breach qualifies as "eligible data breach" in accordance with the Australian Notifiable Data Breaches (NDB) scheme.

Under the Australian NDB scheme we are required to notify individuals and the Commissioner about 'eligible data breaches'. An eligible data breach occurs when the following criteria are met:

- There is unauthorised access to or disclosure of personal information held by CAL (or information is lost in circumstances where unauthorised access or disclosure is likely to occur).
- This is likely to result in serious harm to any of the individuals to whom the information relates.
- CAL has been unable to prevent the likely risk of serious harm with remedial action.

If the data breach is eligible, we will ensure to follow the appropriate notification and reporting steps immediately.

6. Purpose and Disclosure of your Personal Information

6.1 Purposes for which we collect, hold, use and disclose Personal Information

Personal Information may be collected, held, used or disclosed for the purpose of undertaking our obligations and providing services and products for any of the following purposes:

- process applications and providing products and services to our institutional clients;
- identify you or verify your authority to act on behalf of a customer;
- allow us to manage client relationships, run our business and to perform our administrative operations, including accounting, record keeping, systems development & testing, and staff training;
- performing control and risk management functions - including due diligence, anti-money laundering regulatory screening, reporting and monitoring;
- prevent, detect and investigate any (suspected) fraud or crime;
- comply with our obligations under applicable laws and regulations;
- handling complaints and managing legal matters and litigation;
- involved in your employment or engagement such as recruitment agencies; and
- assessing and processing employment applications and conducting due diligence as part of pre-employment screening.

6.2 Disclosure of Personal Information

For the purposes described in the previous section we may sometimes need to disclose your Personal Information to the following parties:

- those involved in providing, managing or administering our product or service to you via our institutional clients;
- government or regulatory bodies (including the Australian Securities and Investment Commission and the Australian Tax Office); or
- other organisations involved in our normal business practices, including our agents and contractors, as well as our accountants, auditors or lawyers and other external advisers.

In some cases, we may need to disclose your Personal Information to related companies, affiliates, agents or contractors located outside Australia.

In all cases, by providing your Personal Information to us or using our services via our institutional clients, you consent to the disclosure of your Personal Information outside Australia as set out in this privacy policy and acknowledge that CAL is not required to ensure that overseas recipients handle your Personal Information in compliance with Australian privacy law. However, where practicable in the circumstances, CAL will take reasonable steps to ensure that overseas recipients use and disclose such Personal Information in a manner consistent with this Privacy Policy.

6.3 Clearstream's internet website

When you use a link from the Clearstream website to the websites of third-parties, those websites are not subject to CAL's privacy standards and are outside our control. Those third-parties are responsible for informing you of their own privacy policies. We are not responsible for the security or privacy of any information collected by third-party websites or other services.

For statistical purposes we may collect information on website activity (such as the number of users who visit the web site, their country, the date and time of visits, the number of pages viewed, navigation patterns and the operating systems and browsers used to access the site). This information on its own does not identify an individual but it does provide us with statistics that we can use to analyse and improve our website.

When you use Clearstream's website, we may send you a temporary cookie. A 'cookie' is a packet of information that allows the server to identify and interact more effectively with your computer that gives you a unique identification number. Please refer to Clearstream's Privacy Policy for further information.

6.4 Access to your Personal Information

If at any time you would like to request access to the Personal Information we are holding about you, you are welcome to ask us in a form or manner which identifies the nature of the Personal Information requested.

Requests can be made to our Privacy Officer as follows:

How	Details
Telephone	+61 2 8031 0200 Monday to Friday between 09:00 and 17:00 AEST
Writing	Clearstream Australia Limited Level 3, 1 Bligh Street Sydney NSW 2000
Email	compliance-australia@clearstream.com

Generally, we will provide you with access to the Personal Information we hold about you within a reasonable time. Under certain circumstances however, we may not be able to provide you with access to the Personal Information we hold about you. This includes where:

- it would have an unreasonable impact on the privacy of another individual;
- the request is frivolous or vexatious;
- information relates to legal proceedings;
- the information would reveal a commercially sensitive decision-making process; or
- we are prevented by law from disclosing the information or providing access would prejudice certain investigations.

If meeting your request requires a significant amount of resources, we may charge a fee to cover our costs for providing access to your Personal Information.

Unless we are unable to do so, we will inform you of the reason(s) for refusing access.

6.5 Corrections and Updates to your Personal Information

We will take reasonable steps to ensure that your Personal Information is accurate, complete and up to date. This includes correcting and updating Personal Information we identify as being incorrect, outdated or where you can demonstrate via our institutional client that the Personal Information we hold about you is incorrect or outdated.

If at any time, you find that the Personal Information we hold about you directly or via our institutional client is inaccurate, incomplete, out-of- date, irrelevant or misleading please advise our Privacy Officer immediately using the contact details above.

If you request a correction or update to the Personal Information we hold about you directly or via our institutional clients and we consider that we are not able to correct the Personal Information in the manner you have requested, then, unless we are unable to do so, we will inform you of the reason(s) for refusing to correct the Personal Information.

7. Complaints

If you wish to make a complaint about our collection, use or disclosure of your Personal Information, you should contact our Privacy Officer (using the contact details above).

We will make every effort to resolve your complaint internally within a reasonable time.

If we do not resolve your complaint to your satisfaction or in a reasonable timeframe:

- you may contact the Australian Financial Complaints Authority (AFCA) by calling them on 1800 931 678; writing to them at GPO Box 3 Melbourne Victoria 3001; emailing them at info@afca.org.au or visiting their website at www.afca.org.au; or
- you may contact the Office of the Australian Information Commissioner by calling them on 1300 363 992; writing to them at GPO Box 5218 Sydney NSW 2001; emailing them at enquiries@oaic.gov.au or visiting their website at www.oaic.gov.au/privacy.

8. Changes to this Privacy Policy

Please note that this Privacy Policy may change from time to time. You may at any time request a current copy from your CAL business contact or access it from the CAL website (<https://www.clearstream.com/clearstream-en/products-and-services/investment-funds-services/australia>).

Contact
www.clearstream.com

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