



Privacy Policy

March 2023

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1. SCOPE

This Privacy Policy relates to Magellan Financial Group Limited and its Australian related bodies corporate (together **"Magellan"**, **"we"**, **"our"** and **"us"**).

This Privacy Policy explains how we collect, hold, use, disclose and protect your personal information.

2. COLLECTION OF PERSONAL INFORMATION

When you invest in a financial product that is offered by Magellan, personal information about you (such as your name, address, date of birth, bank account information and tax file number) is collected primarily through our standard forms (such as our application form).

When you visit our website, we may collect technical and navigational information, such as device type, browser type, Internet protocol address, pages visited, and average time spent, user journeys and demographics. Information is collected on an anonymous basis and is used by us to analyse the efficacy of our marketing campaigns and to improve our website design and functionality.

We may collect your name, investor number, address, phone number, email address and postcode when you complete forms or sign up to publications on our website. This information is used by us to provide you with online access to your investments or to provide you with marketing material.

3. USE OF PERSONAL INFORMATION

We use your personal information to establish and administer your investment, comply with relevant laws and regulations such as the Anti-Money Laundering and Counter-Terrorism Financing Act, Foreign Account Tax Compliance Act and the Common Reporting Standard, and to communicate with you about your investment. The processing of applications and redemptions may be delayed or refused if you do not provide the personal information requested from Magellan to comply with legal requirements.

Personal information may be used for secondary purposes such as the provision of promotional and marketing material. You can contact us at any time if you do not wish to receive such materials or information.

Where we collect your personal information for a specific purpose (not contemplated in this Privacy Policy), you will be provided with a collection notice which explains the primary purpose (and any related secondary purposes) for which your personal information is being collected.

We do not actively seek to collect sensitive information (for example health information or information about any criminal record), unless it is necessary for business purposes. If we do have to collect sensitive information, we will only collect, use and disclose it in accordance with privacy laws.

4. DISCLOSURE OF PERSONAL INFORMATION

We may disclose your personal information to persons/entities outside of Magellan, including to:

- our external service providers that provide investment administration, registry, custody and/or other services;
- any joint holder of an investment;
- parties authorised by you such as a licensed financial adviser, dealer group or service provider; and
- governmental or regulatory bodies and agencies (such as ASIC, ATO, AUSTRAC or a law enforcement agency).

Magellan uses third party investment administrators and registries to support the administration of our financial products. We have contractual arrangements with these service providers to ensure they comply with privacy laws when dealing with your personal information.

Your personal information may be provided to external service providers in offshore locations such as the Philippines and India.

5. ACCESSING AND CORRECTING PERSONAL INFORMATION

If you require access to, or wish to update your personal information, please contact our Privacy Officer:

Privacy Officer
Magellan Asset Management Limited
Level 36, 25 Martin Place, Sydney, New South Wales, 2000
Tel: + 61 2 9235 4888

Email: privacy@magellangroup.com.au

If you believe that the personal information we hold is inaccurate, incomplete or out-of-date, you should contact us to correct this information.

We will endeavour to promptly update any personal information that is inaccurate, incomplete or out-of-date. If we do not agree that the personal information is inaccurate, incomplete or out-of-date, we will notify you in writing of our reasons to refuse any corrections. We will also notify you of what you can do if you are not satisfied with our response.

6. PROTECTION OF PERSONAL INFORMATION

We take all reasonable steps to protect your personal information from misuse, loss, unauthorised access, interference, modification or disclosure.

We have physical, electronic and procedural safeguards to protect your information which is held by us. For example, your personal information is stored in secured office premises and electronic databases requiring logins and passwords for access. Access to information stored electronically is restricted to staff whose job purpose requires access. We also require all staff to maintain the confidentiality of customer information.

7. ELIGIBLE DATA BREACH

Our service providers are required to notify us of any unauthorised access, disclosure or loss of personal information.

In such a circumstance, Magellan performs an assessment to determine if there has been an 'eligible data breach' whereby the access or disclosure of the personal information is likely to result in serious harm to the individuals to whom the information relates. If Magellan determines there has been an 'eligible data breach' then the individuals affected will be notified as soon as practicable of the details of the breach and the recommended steps to take in response to it. If required, Magellan will also inform the Office of the Australian Information Commissioner at the same time.

8. CONTACTING US

If you have any questions about this Privacy Policy or wish to make a complaint about how we have handled your personal information, please contact our Privacy Officer:

Privacy Officer
Magellan Asset Management Limited
Level 36, 25 Martin Place, Sydney, New South Wales, 2000
Tel: + 61 2 9235 4888
Email: privacy@magellangroup.com.au

We will endeavour to answer any questions, correct any error on our part or resolve any complaint you may have about our information handling practices. If we do not resolve a complaint to your satisfaction, you may refer the matter to the Office of the Australian Information Commissioner (see www.oaic.gov.au).