



# Privacy Policy

Effective Date 10 |04 | 2019

## 01 Introduction

Lonsec Holdings Pty Ltd and its group companies (Lonsec Group) value the privacy of your personal information.

Personal Information refers to information or an opinion about an individual whose identity is apparent from the information stored. It includes your name and contact details.

The Lonsec Group is bound by, and committed to supporting, the 13 Australian Privacy Principles (“APPs”) set out in the *Privacy Act 1988* (Cth).

The following statement outlines how we collect, maintain and handle your personal information according to the APPs.

## 02 Collecting Your Personal Information

Our business encompasses managed investments and listed securities research, awards and ratings, portfolio consulting, managed accounts and data and analytics..

### **Why do we collect your personal information?**

If you are a member of senior management of an entity under review, we collect your personal information in order to prepare ratings and research reports in relation to your business.

If you are a customer or prospective customer, we collect your personal information to provide our services to you and/or your business and with information about other products and services that may be of interest to you.

What kind of personal information do we collect?

We may collect some or all of the following personal information for the purposes set out in this Privacy Policy:

- Name and contact details (such as home address, email address and, telephone number)
- Employment details, such as work address and contact details (such as telephone number, and email address) and work practices
- Feedback queries
- Website usage details

If you do not provide the personal information requested, the Lonsec Group may not be able to provide ratings and research in relation to your business or provide you with other services or information about our products and services.

### **How do we collect and hold personal information?**

The Lonsec Group collects personal information via subscription forms, contracts, telephone, fax, email, feedback forms and online (including via its website). Where practicable, the Lonsec Group will collect personal information directly from you via one of these methods, but also from publicly available material.

We may receive personal information from third parties that you have authorised us to deal with. This could be your business or legal representatives. If you provide us with personal information of another person you should let that person know that their information has been provided to the Lonsec Group and will be handled by us in accordance with this Policy.

We may hold the information that we have collected in both physical and electronic storage facilities, including paper-based files or computer databases. Personal information may be held within applications on our IT systems or client relationship management system. Key data is held at locations in Australia, United States, Ireland and other European countries, and Japan, either at a Lonsec Group site or third-party site. This list may be updated from time to time.

We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

## 03 Use and Disclosure of Your Personal Information

### **For what purposes do we use personal information?**

Generally, the Lonsec Group will only use and disclose personal information for the purpose it was collected. The main reason for collecting personal information is to enable the Lonsec Group to provide services to you or your business. 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

We may also use and disclose personal information for other related purposes which we consider an individual would reasonably expect. These purposes include administration and providing services to you in relation to which includes monitoring, auditing, evaluating, modelling data, dealing with complaints, answering queries, to provide you with a better service and to maintain and develop our business systems and infrastructure, including testing and upgrading of these systems.

### **Direct marketing**

We may send you direct marketing communications and information about our products and services that we consider may be of interest to you. These communications may be sent in various forms, including 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, we will endeavour to use that method whenever practical to do so. In addition, at any time you may opt-out of receiving marketing communications from us by contacting us (see the details below) or by using opt-out facilities provided in the marketing communications and we will then ensure that your name is removed from our mailing list.

We do not sell your personal details to direct marketing businesses but may share your information with third parties for purposes of executing our marketing campaigns. We may also carry out promotional efforts on behalf of our related companies or business partners.

### **Who may we disclose information to?**

The Lonsec Group may share your personal information with its employees, contractors or agents for the purposes of responding to and fulfilling requests made by you and to otherwise provide our products and services to you.

We may also share your information with service providers who provide outsourced services to a member of the Lonsec Group. The types of outsourced service providers that may be provided with your personal information and the circumstances in which your personal information may be shared include:

- Printers and other companies for the purposes of preparation and distribution of statements and for handling mail
- Legal and accounting firms, auditors, contractors, consultants, agencies and other advisers for the purpose of administering, and advising on, our services and products and for any associated actions
- Providers of document management, cloud storage or client relationship management systems

In certain circumstances and with safeguards to respect your privacy, we may also disclose your personal information to any person to use in relation to a proposed or actual purchase of an interest in the Lonsec Group or any part of our business

The Lonsec Group may also disclose your personal information to other entities or persons as required by law. For example, information may be provided to government regulators or as required by a court order.

We may also disclose your personal information where you have consented.

## 04 Your Privacy on The Internet

### **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; however, this may impact the performance of service delivery.

### **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.

## 05 Access to and Correction of Your Personal Information

You may request access to any personal information the Lonsec Group holds about you. Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you). In normal circumstances we will give you full access to your information. However, there may at times be a legal reason to deny access. If access is denied, we will tell you why.

If you believe that any personal information we hold about you is incorrect, incomplete or inaccurate, then you may request that we correct it. We will consider if the information requires correction.

## 06 Dealing With Us Anonymously

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.

## 07 Data Quality and Accuracy

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

If any of the details you provide change or you believe that the personal information we hold about you may be inaccurate or incomplete then please contact us.

## 11 Security of Personal Information

The Lonsec Group takes reasonable steps to protect the personal information that it holds from misuse or loss and from unauthorised access, modification, and disclosure. The Lonsec Group has implemented security measures to protect the personal information that it holds, including requiring use of passwords, user logins, and other security procedures. Developments in security and encryption technology are reviewed regularly.

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

Personal information is destroyed or de-identified when no longer needed or when we are no longer required by law to retain it (whichever is the later).

## 12 Complaints

The Lonsec Group treats any complaints about our handling of personal information seriously. If you believe that your privacy has been breached, please contact us using the contact information below and provide details of the incident so that we can investigate it. We will treat your complaint confidentially. We will fully investigate any complaint you lodge with us and seek to provide a response within a reasonable time (and in any event within the time required by the Privacy Act, if applicable).

☎ 1300 826 395

☎ [info@lonsec.com.au](mailto:info@lonsec.com.au)

If you are not satisfied with the outcome of the complaint you may lodge a formal complaint with the Office of the Australian Information Commissioner.

## 13 Changes to our Privacy Policy

We may change this Policy from time to time. Any updated versions of this privacy policy will be posted on our website and will be effective from the date of posting.