



Perpetual Limited

# **GROUP POLICY - PRIVACY**

10 May 2019

Perpetual 

Perpetual Limited  
ABN 86 000 431 827

# PURPOSE

Perpetual is committed to protecting your privacy and safeguarding your personal information.

This privacy policy explains how Perpetual manages and protects personal information, including:

- what personal information Perpetual collects
- how Perpetual collects and stores personal information
- how Perpetual uses personal information
- how personal information can be disclosed to others
- how you may access or correct your personal information
- how you can complain if you have concerns about how Perpetual has managed your personal information.

Perpetual has practices in place to comply with the Australian Privacy Principles set out in the Privacy Act 1988. These principles govern how organisations handle personal information.

# SCOPE

This Policy applies to Perpetual Limited (ABN 86 000 431 827) and its related bodies corporate located in Australia.

This Policy does not apply to Perpetual (Asia) Limited.

# POLICY

## 1. WHAT PERSONAL INFORMATION DOES PERPETUAL COLLECT?

Personal information is information or an opinion about you from which you can be reasonably identified. The personal information Perpetual may collect about you will depend on the circumstances of collection, including whether we collect the information from you as a customer, supplier, contractor, stakeholder, job applicant or in some other capacity.

Perpetual collects personal information so that we can provide you with our products and services and comply with our legal obligations such as those under superannuation laws, taxation laws and the Anti-Money Laundering and Counter-Terrorism Financing Act. If Perpetual does not collect your personal information, we may not be able to provide you with a product or service.

The product or service that we are providing will also determine what information we will collect about you. The kinds of personal information that Perpetual may collect and hold about you include: your name, contact details, date of birth, citizenship, tax file number (TFN), employment details, financial information and banking details. In some cases we may collect information about your family (eg details related to your spouse, dependents or beneficiaries where we are providing you with tax or estate planning services).

In addition, we may collect personal information about individuals who are not customers of Perpetual (eg business contact details of a company representative with whom we deal).

In the context of Perpetual's recruitment process for employees and contractors, we may collect and hold the following kinds of personal information about you: your name, contact details, date of birth, citizenship, employment references, civil, credit and criminal records, regulatory accreditation (such as RG 146 accreditation), media (including social media), directorships, property ownership and driver's licence information, education, employment history and credential variation.

In the employment context, we may also collect and hold the personal information listed above, as well as your TFN, financial information, banking details, and other personal information that may be collected in your use of Perpetual systems or assets. This information may be collected to assist us in monitoring compliance with our internal policies and perform other necessary functions and activities.

Generally, we will not collect sensitive information about you (such as your race, political beliefs or religion). We may collect information about your health if necessary to provide you with a product or service (eg life or disability insurance products or to manage a claim related to such a product). If we need sensitive information, we will ask for your consent when we collect this information (unless an exemption applies).

## **2. HOW DOES PERPETUAL COLLECT AND STORE PERSONAL INFORMATION?**

### **COLLECTING INFORMATION**

Depending on how you choose to interact with us, we may collect your personal information when you contact us or our service providers by telephone, by email, through our web site, complete an application or registration form, or when you meet one of our representatives face to face.

Perpetual may also collect information about you from third parties. For example, Perpetual may collect personal information from:

- your authorised representatives and advisor(s)
- our service providers
- your employer
- our corporate clients, where we are providing services to them
- referees, in the case of prospective employees.

### **COLLECTING INFORMATION FROM VISITS TO PERPETUAL'S WEBSITE**

Perpetual may collect information based on how you use Perpetual's website. Perpetual uses "cookies" and other data collection methods such as pixel tags to collect information on website activity such as the number of visitors, the number of pages viewed and the internet advertisements which bring visitors to our site. This information is collected to analyse and improve our website, our marketing campaigns and to record statistics on web traffic. No attempt is made by Perpetual to use this information to personally identify you.

If you access your account information online through one of the secure areas of Perpetual's website, we will collect information about your visit using cookies to track your use of our website and to allow you to effectively access your account information. This information is collected for security purposes and to protect the integrity of your account details.

### **SECURING YOUR PERSONAL INFORMATION**

We hold personal information in secure computer storage facilities (both in-house and at our service providers); on paper-based files; as well as in other formats. Perpetual takes reasonable steps to protect your information from loss and unauthorised access, destruction, use, modification or disclosure. Access to personal information held by Perpetual is controlled to prevent misuse or unauthorised disclosure of the information. We utilise a range of technical security measures such as secure authentication, password controls, encryption, firewalls and anti-virus technology to prevent unauthorised access to your information.

## **3. HOW DOES PERPETUAL USE YOUR PERSONAL INFORMATION?**

Perpetual may collect, hold, use or disclose your personal information to provide you, and our corporate clients, with a range of products and services, such as:

- establishing and managing your investment in our superannuation or investment funds
- establishing a life, disability or salary continuance insurance product or managing a claim related to such a product
- providing you with tailored financial advice, accounting or tax services
- planning and managing your wills, trusts and estates

- providing our corporate clients with trust, fund or fiduciary services.

We may also collect, hold, use or disclose your personal information to:

- consider any concern or complaint that you raise against Perpetual and/or to manage any legal action between you and Perpetual
- prevent or investigate any actual or suspected fraud, unlawful activity or misconduct
- identify you or establish your tax status under any Australian or foreign legislation
- comply with any relevant laws, regulations, codes of practice and court orders
- consider job applicants for employment.

Personal information collected about you may be used by different companies within the Perpetual group, but only if this is necessary in order for us to provide you with our products or services.

Perpetual may use your personal information that we have collected about you to identify a product or service that may be of interest to you. If at any time you no longer wish to be notified about other Perpetual services or promotions please contact us. Privacy specific contact details are included at the end of this policy.

We may also use your information for other purposes required or authorised by or under law (including purposes for which you have provided your consent).

#### **4. HOW IS PERSONAL INFORMATION DISCLOSED TO OTHERS?**

Perpetual does not sell, rent or trade personal information to, or with, third parties.

In some circumstances your information may be disclosed to Perpetual's related entities or service providers that perform a range of services on our behalf. Examples include:

- mailing houses and printing companies
- fund and investment administrators/managers
- auditors and solicitors
- custodians and brokers
- registry and platform providers
- insurance providers
- Information Technology vendors
- other consultants.

In some circumstances, personal information may be disclosed to Perpetual related entities and third parties in jurisdictions including, but not limited to, Australia, New Zealand, Singapore, United Kingdom, Ireland, the Netherlands, the United States of America, India, Japan and Canada.

Where we disclose your information to our service providers, we will take steps to ensure that they are authorised to only use personal information in order to perform the functions required by Perpetual.

Depending on the nature of the product or service that we are providing, we may disclose your personal information to your nominated representatives (eg your financial adviser) and their respective service providers.

In relation to superannuation products, we may disclose your personal information to the trustee of another superannuation fund where your superannuation is transferred to or from the other fund.

We may also disclose your personal information to law enforcement agencies, courts or government agencies where required to comply with specific legal requirements. In particular, if you are a shareholder of Perpetual Limited, the Corporations Act 2001 requires certain information to be included in Perpetual Limited's register which is able to be accessed by the public.

With your consent, we may also disclose your personal information to other third parties and for other purposes. That consent may be written, verbal or implied from your conduct.

## **5. HOW YOU MAY ACCESS OR CORRECT YOUR PERSONAL INFORMATION**

You may contact us to request access to the personal information we hold about you at any time. You may also ask us to correct information about you that you may believe is inaccurate, incomplete or out of date.

We will need to verify your identity before giving you access, or correcting your information.

In certain circumstances, Perpetual may not be able to correct or provide you with access to your information. In these circumstances, we will write to you to explain and provide the reasons why.

## **6. HOW YOU MAY COMPLAIN IF YOU HAVE CONCERNS ABOUT HOW PERPETUAL HAS MANAGED YOUR PERSONAL INFORMATION**

If you have a complaint related to how Perpetual has managed your personal information, please contact us using the contact information below. We may ask you to place your concerns in writing in order for us to fully understand and investigate the issues you have raised. We will acknowledge any complaint within five business days of it being received and make every effort to resolve your issue within a reasonable time of us being notified.

If a complaint remains unresolved, you may access an external dispute resolution service or apply to the Office of the Australian Information Commissioner (OAIC) to have the complaint heard and determined. The Commissioner may be contacted on the privacy hotline: 1300 363 992.

When we write to you about our decision, we will explain how you may access an external dispute resolution scheme or make a complaint to the OAIC.

## **NEED MORE INFORMATION?**

If you have any questions about this privacy policy, if you wish to complain about how we handled personal information about you, or if you wish to access or correct your personal information, please contact Perpetual's Privacy Officer:

Privacy Officer, Perpetual Limited

GPO Box 4172

SYDNEY NSW 2001

Telephone: 02 9229 9000

E-mail: [privacy@perpetual.com.au](mailto:privacy@perpetual.com.au)

**NEW SOUTH WALES**

Angel Place  
Level 18, 123 Pitt Street  
Sydney NSW 2000

**AUSTRALIAN CAPITAL  
TERRITORY**

Level 4, 10 Rudd Street  
Canberra ACT 2601

**VICTORIA**

Rialto South Tower  
Level 35, 525 Collins Street  
Melbourne VIC 3000

**SOUTH AUSTRALIA**

Level 11, 101 Grenfell Street  
Adelaide SA 5000

**WESTERN AUSTRALIA**

Exchange Plaza  
Level 29, 2 The Esplanade  
Perth WA 6000

**QUEENSLAND**

Level 6, 260 Queen Street  
Brisbane QLD 4000

[www.perpetual.com.au](http://www.perpetual.com.au)

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