



**PERPETUAL**  
EQUITY  
INVESTMENT  
COMPANY  
LIMITED

ACN 601 406 419

**PRIVACY POLICY**

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Perpetual 

# PERPETUAL EQUITY INVESTMENT COMPANY LIMITED

## PRIVACY POLICY

### PURPOSE

Perpetual Equity Investment Company Limited ACN 601 406 419 (the **Company**) is committed to protecting your privacy and safeguarding your personal information. This Privacy Policy explains how the Company collects, manages and protects personal information, including:

- What personal information we collect
- How we collect and store personal information
- How we use 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 we have managed your personal information.

The Company has practices in place to comply with the 13 Australian Privacy Principles set out in the *Privacy Act 1988*. These principles govern how organisations handle personal information.

### POLICY

#### 1. WHAT PERSONAL INFORMATION DOES THE COMPANY COLLECT?

Personal information is information or an opinion about you from which you can be reasonably identified. The Company collects personal information so that we can administer your investment in the Company, provide facilities and services that you request and comply with our legal obligations. If the Company does not collect your personal information, we may not be able to provide you with these services.

The kinds of personal information that we may collect and hold about you include: your name, contact details, date of birth, citizenship, tax file number (TFN) and banking details.

In addition, we may collect personal information about other individuals (e.g. business contact details of a company representative with whom we deal).

Generally, we will not collect sensitive information about you (such as your race, political beliefs or religion). If we need sensitive information, we will ask for your consent when we collect this information (unless an exemption applies).

#### 2. HOW DO WE 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 website or when you complete a form or document and provide it to us.

We may also collect information about you from third parties. For example, we may collect personal information from our service providers, including Link Market Services Limited.

##### Collecting information from visits to the Company's website

We may collect information based on how you use our website or digital media. The Company uses "cookies", analytics tools and other data collection methods to collect anonymous information on website activity such as the number of visitors, the number of pages viewed and the internet advertisements and social media posts which bring visitors to our website. This information is collected to analyse and improve our website, or marketing campaigns and to record statistics on web traffic.

Cookies are small text files that are placed on your computer by the websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information

to the owners of the site, including for the purpose of improving advertising and marketing campaigns. The Company's website also uses cookies and website analytics (e.g. Google Analytics) for collection of data about our website visitors, including (but not limited to) how the website is found, which pages are viewed, and what files are downloaded by visitors. This information is combined into an overall picture of website use, but does not individually identify you unless you have already agreed to receive marketing communications as part of your customer record.

If you are uncomfortable with the use of cookies, you can manage and control them through your browser, including removing cookies by deleting them from your 'browser history' (cache) when you leave the website.

The information collected is only used within the Company and by preferred vendors to measure the success of our website, digital advertising, and social media and to improve our ability to provide relevant information and content to users.

No attempt is made by the Company to personally identify you, except when you submit a digital form. If you complete and submit a form on our website, a social media channel or mobile app, you agree to enter your information in those platforms. The information we collect is stored, accessed and used by us to administer our appearance on those platforms as required. The Company uses forms for the purposes of forming a direct relationship between you and the Company, and only when you have indicated consent by submitting the form.

**The Investor Centre is provided and managed by a third party. If you access your account information online through the Investor Centre, you should be aware of the Terms & Conditions and Privacy Policies of that platform.**

### **Securing your personal information**

We hold personal information in secure computer storage facilities (either in-house or at our service providers); on paper-based files; as well as in other formats. The Company takes reasonable steps to protect your information from loss and unauthorised access, destruction, use, modification or disclosure. Access to personal information held by the Company 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.

The Company's vendors that administer personal information are required to comply to similar protection measures.

### **3. HOW DO WE USE YOUR PERSONAL INFORMATION?**

The Company may collect, hold, use or disclose your personal information so that we can administer your investment in the Company and provide facilities and services that you request.

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

- Consider any concern or complaint that you raise against the Company or to manage any legal action between you and the Company;
- 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; or
- Comply with any relevant laws, regulations, codes of practice and court orders.

The Company 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 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?**

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

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

- Our Investment Manager, Perpetual Investment Management Limited
- Mailing houses and printing companies;

- Auditors and solicitors;
- Registry providers (including Link Market Services Limited);
- Information Technology vendors; or
- Other consultants.

In some circumstances, personal information may be disclosed to third parties (including service providers) in jurisdictions including, but not limited to Australia, New Zealand, United Kingdom, Malaysia, and India.

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 the Company.

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, the Corporations Act 2001 (Cth) requires certain information about you to be included in the Company's registers 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, the Company 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 WE HAVE MANAGED YOUR PERSONAL INFORMATION**

If you have a complaint related to how the Company 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 in writing within five business days of it being received and make every effort to resolve your issue within a reasonable time of us being notified. Resolving your concerns may require the Company to share your personal information with third parties in this process, including to our service providers or regulatory bodies.

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.

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.

The OAIC may be contacted on the privacy hotline: 1300 363 992.

## **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 the Privacy Officer:

Privacy Officer,  
GPO Box 4172  
SYDNEY NSW 2001  
Telephone: 02 9229 9000  
E-mail: [privacy@perpetual.com.au](mailto:privacy@perpetual.com.au)