

# Privacy Statement

For Australian Investors

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**IMPORTANT: You should read this Privacy Statement if you are an individual whose ‘personal information’ we collect. This Privacy Statement is our Privacy Policy for the purposes of the Privacy Act 1988 (Cth) (the Act) and provides information on how we manage your ‘personal information’, which is any information or an opinion about an identified or reasonably identifiable individual. It also provides information on certain matters relevant to individuals whose personal information we may collect, hold, use and disclose from time to time.**

This Privacy Statement (the “Privacy Statement”), is the Privacy Policy of the following State Street entities in Australia, for the purposes of the Act and provides information on how your “personal information” is managed, including how it is collected, held, used and disclosed from time to time by these APP entities, which are all part of the “State Street Group”, including other branches, subsidiaries and related entities.

- State Street Australia Limited (“SSAL”) ABN 21 002 965 200, AFSL 242429
- State Street Bank and Trust Company, Sydney Branch (“SSBT”) ABN 70 062 819 630, AFSL 239679
- State Street Global Markets International Limited (“SSGMIL”) ARBN 120 116 065
- State Street Global Advisors, Australia, Limited (“SSGA AL”) ABN 42 003 914 225, AFSL 238276
- State Street Global Advisors, Australia Services Limited (“SSGA ASL”) ABN 16 108 671 441, AFSL 274900

In this document, “we”, “us”, “our” means the individual APP entity.

We may make any changes to this Privacy Statement from time to time and for any reason. Any changes will be reflected in brochures and our website.

## **Respecting and protecting your privacy**

At State Street we respect your right to privacy and are committed to ensuring your personal information is collected, used, disclosed, and maintained in accordance with the Australian Privacy Principles (APP) under the Act, our global and local policies.

We protect your personal information with the same integrity that we would use to handle our own individual personal information. This enables us to conduct business and exchange information in a secure environment, meeting employee, customer and regulator expectations for privacy, security and confidentiality.

## **Personal information we may collect**

The type of personal information that we may collect and hold will vary depending on: (i) the service we provide, which includes custody, fund administration, funds management and other financial services; and (ii) the circumstances in which we are dealing with you.

Also, where you have applied for a position with us, we will only collect and hold personal information relevant to that relationship with you.

The personal information we collect may include:

- your full name, date of birth, gender and occupation;
- contact details, such as your address, email address and telephone numbers;
- tax file number and bank account details;
- identification documentation (for example, a driver’s licence or passport);
- tax residency and taxpayer identification number used outside Australia;
- Information and documentary evidence about place of birth, residency and citizenship.

Where we collect certain information, for example, tax file number, and you choose not to provide the information, it may mean that we will not be able to provide the services that you require.

The Act restricts the collection of sensitive personal information. Sensitive information includes information about an individual’s racial or ethnic origin, health, criminal record, religious beliefs, or membership of political, professional or trade association.

We may be required to collect and use sensitive information about you in order to provide the products and services you have requested but we will only do this with your consent unless we are permitted by law to do so without your consent.

Your personal information may be collected by others on our behalf such as service providers, agents, advisers and brokers.

Information about you may also be collected from publicly available sources such as public registers or information made available by third parties.

## Why do we have to collect, hold, use and disclose personal information?

We collect, hold, use and disclose your personal information as is reasonably necessary to administer our products and services and manage our relationship with you, as well as to comply with our legal obligations and assist government and law enforcement agencies or regulators. For example, we may be required to disclose your personal information to Australian Government regulators such as the Australian Securities and Investments Commission (ASIC), Australian Tax Office (ATO), Australian Transaction Reports and Analysis Centre (AUSTRAC) and to other regulatory or government entities.

We may also collect, hold, use and disclose your personal information for the following purposes:

- establish your identity and assess applications for products and services;
- recruitment and employment purposes – for example, to assess your suitability to the position you are applying for;
- managing your account as a holder of a fund we manage and operate;
- engaging service providers, contractors or suppliers;
- to maintain your details so we are able to respond to any of your enquiries or contact you;
- dealing with complaints;
- meeting legal and regulatory requirements. Various Australian laws may expressly require the APP entities to collect your personal information or the APP entities may need to do so in order to be able to comply with other obligations under those laws. Such laws include the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (for example, to comply with obligations to combat money laundering and financing of terrorism), the U.S. Foreign Account Tax Compliance Act, the Taxation Administration Act 1953, the Income Tax Assessment Act 1936 and other taxation laws (for example, to comply with obligations relating to employment or with information requests issued by the Commissioner of Taxation); enforcing our rights, including undertaking legal proceedings;
- promoting our products and services – for example, for direct marketing purposes where the law permits. In the event that you do not want to receive direct marketing materials please contact our registry services provider, Link Market Services Limited (“Link”) on 1300 554 474 or you may use the unsubscribe functionality available on our marketing documents to opt out from receiving direct marketing;
- In other ways where permitted by law.

## How we collect personal information

If it is reasonable and practical to do so, we will collect personal information directly from you. In most circumstances your personal information will be collected by Link on our behalf. You should also refer to Link’s Privacy Policy.

We may collect your personal information through application forms, over the telephone, via email, the internet, or in person when you visit our office. We may collect your personal information when you call us. We may monitor and/or record telephone calls for the purposes of staff training and to verify statements made during the telephone call.

We may also need to collect personal information from other third parties, including:

- your representative (such as a legal adviser, financial adviser, accountant), for example where we need to verify information you have provided;
- and government agencies, such as the Federal Police, for example where we suspect that unlawful activity has been or may be engaged in and the personal information is a necessary part of our investigation for reporting of the matter.

If you do not provide the information requested, or it is incomplete or inaccurate, we may not be able to provide our services to you.

## Do we disclose your personal information to others?

We may disclose or share your personal information for the purposes listed above or as otherwise permitted by the Act to third parties that include the following:

- entities within State Street, locally or overseas, including without limitation the U.S., China, India and the Philippines;
- entities outside State Street situated in Australia, the U.S., and the Asia-Pacific region (including without limitation, India, and the Philippines) – for example:
- service providers to whom services may be outsourced such as mailing functions, statement production, information technology support and direct marketing services;
- insurers;
- our accountants, auditors or lawyers;
- third parties that act on your behalf or that are otherwise connected with you (such as your legal adviser or financial adviser);
- courts, tribunals, government and regulatory agencies or bodies, police; and
- other persons and entities as permitted under the Act.

State Street operates as a global organisation and certain functions operate from dedicated centres which also provide

shared services around the globe. As referred to above, some related bodies corporate and other recipients to whom we disclose your personal information may be based overseas. We require overseas service providers to take reasonable steps to protect personal information from unauthorised use or disclosure in accordance with the relevant APPs or ensure they operate in countries with laws to protect your information substantially similar to the protection provided by the APPs.

## **Anonymity and adoption of a pseudonym**

Although the Act allows for you to deal with us anonymously or by using a pseudonym, we can only allow this in limited circumstances, such as in relation to enquiries of a general nature. We are unable to allow anonymous dealings or the adoption of a pseudonym in relation to more specific enquiries about your account with us.

## **Keeping your personal information secure**

We have security systems, policies, processes and procedures that meet current industry standards, to protect your personal information from misuse, loss and unauthorised access, modification or disclosure and we regularly review their effectiveness. The only people who are allowed to handle or have access to your personal information are those employees of State Street Australia and the State Street Group and those who perform services for us who need your personal information to do their jobs.

## **Keeping your personal information accurate and up-to-date**

We maintain the quality of your personal information by taking reasonable steps to make sure that the information collected, used and disclosed is accurate, complete and up-to-date and we encourage you to contact us about the changes to your personal details.

## **Accessing and correcting your personal information**

You can request access to the personal information we hold about you by contacting us with your request, using the contact details set out below. We will need to verify your identity before completing your request.

We may not always be able to give you access to all the personal information we have about you. For instance, we may not be able to give you access to information that:

- would reveal personal information about another person;
- would reveal a commercially sensitive decision-making process;
- we are prevented by law from providing to you; or
- relates to existing or anticipated legal proceedings.

You can also request correction to the personal information we hold about you by contacting us with your request, using the contact details set out below.

## **How to contact us (includes making a complaint)**

You can contact us about this Policy, to request access or correction to your personal information, or if you have a complaint about the way we handled your personal information, by:

for SSAL, SSBT and SSGMIL:

- mail to the Privacy Officer (insert name of entity), Compliance Department, Level 14, 420 George Street, Sydney NSW 2000, Australia.
- calling us on: +612 9323 6000, and ask to be connected to the Privacy Officer in the Compliance Department.

for SSGA AL and SSGA ASL:

- mail to the Privacy Officer, State Street Global Advisors, Compliance Department, Level 17, 420 George Street, Sydney NSW 2000, Australia.
- calling us on: +612 9240 7600, and ask to be connected to the Privacy Officer in the Compliance Department.

We aim to complete/resolve your request/complaint within 30 days of receiving it, or longer for a more complex request or complaint. Please note that our process also includes notifying our Corporate Privacy Office in the U.S.

If you are unhappy with the handling of your complaint you may also contact the Office of the Australian Information Commissioner by calling them at 1300 363 992, visiting [www.oaic.gov.au](http://www.oaic.gov.au) or writing to the Office of the Australian Information Commissioner, GPO Box 5218, Sydney NSW 2001.