

# Global Privacy Policy

**July 2020**

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## Who is Link Group

Link Group is a market-leading financial administrator that connects people with their assets. We provide technology-enabled administration solutions and related services across multiple product classes including superannuation, managed investments, equities, debt and property.

Since inception, Link Group has been entrusted by clients to handle commercial and personal data in a secure and confidential manner. A full listing of our business units by Division is shown in Schedule A.

This document serves as a Privacy Policy and Privacy Notice that covers all Link Group subsidiaries. In this Policy, references to **we**, **us** or **our** are references to Link Group.

### 1. What is this policy?

- 1.1. We may collect Personal Information (defined below) about you and we are committed to protecting this Personal Information and your privacy. Set out in this Policy is an explanation of how we collect, use and safeguard your Personal Information. In most jurisdictions where we operate, the protections set out in this Policy also apply to the Personal Information of our employees provided by those employees to us.
- 1.2. The purpose of the Policy is to provide individuals and organisations with transparency about our collection, usage, maintenance, storage and destruction of Personal Information.
- 1.3. The key principles of integrity, openness, transparency, and respect for the rights of individuals are all elements of this Policy which apply to all of our business units globally.

### 2. Why do we need this policy?

- 2.1. This Policy sets out the minimum requirements for all our businesses and their employees for the confidentiality, security, integrity, and protection of Personal Information.
- 2.2. Where a jurisdiction in which we operate has regulatory or governance obligations over and above these Policy minimums, for that jurisdiction these additional requirements are included in Schedule B. Additionally, European Union (EU) residents ('data subjects') are entitled to additional rights under the General Data Protection Regulation (GDPR), that apply even where the data controller (i.e. the entity that 'determines the purpose and means for processing personal data') is based outside of the EU and is offering goods or services to residents within the EU. These rights are also shown in Schedule B.

### 3. What personal information do we collect?

- 3.1. The principles of data protection are that only sufficient personal data should be collected and processed as is necessary for the purpose for which it was collected or obtained. We will only collect and use personal data about you that are necessary to provide you with the products and services that you have requested.
- 3.2. The information we collect depends on the nature of our relationship with you. **Personal Information** we may collect includes:
  - name;
  - age or date of birth;
  - marital status;

- mailing and/or street address;
- email address;
- telephone number;
- profession, occupation or job title;
- superannuation and retirement plan details (including any government issued identifier and beneficiary details);
- insurance details (relating to superannuation and pensions);
- banking details;
- details of the services an individual has acquired from us or our clients or which an individual has enquired about, together with any information necessary to deliver those services and to respond to enquiries;
- any additional information, relating to an individual, provided to us directly or indirectly through our websites or online presence or through our representatives;
- information provided to us through our service centres, meetings with our representatives or customer surveys; and
- information related to tax residency status.<sup>1</sup>

In addition to Personal Information we may collect as part of your use of our websites (see section 10 of this Policy), you will also have the option to submit additional Personal Information to us by sending an email to us or submitting an online enquiry or quotation form through our websites.

3.3. Regardless of whether we are acting as the data controller or otherwise, we may collect Personal Information directly from you:

- via application and various event registration forms;
- through feedback forms and other forums;
- when you purchase any of our products and services or our clients' products and services;
- when you fill out a survey, or vote in a poll on our websites;
- via our telephone calls with you, which may be recorded;
- when you provide your details to us either online or offline;
- when you communicate with us via email; or
- via cookies (see section 10 of this Policy for further information).

3.4. Depending on the nature of our relationship with you, we may also collect your Personal Information from other sources including:

- companies used to validate your identity for financial crime purposes where a record of the search may be retained;

<sup>1</sup> Only if, and insofar as is, relevant and necessary for the provision of contracted or requested services.

- from third party registers maintained by regulators such as those listed in Schedule D;
- from your financial advisor; or
- from your legal representative or an appropriately appointed authorised representative.

#### 4. Why do we collect your personal information?

4.1. This is dependent upon the nature of the relationship we have with you. For example:

- if you are an investor, we may be required by law to use your Personal Information for identity verification, and to administer your investment product;
- if you are a financial advisor or an employee of a financial advisory firm, we may use your Personal Information to provide you with information about your client or our products and services;
- if you are an employee of a firm with whom we have a business relationship, we may use your Personal Information as part of our contractual obligations and in the normal course of doing business with your firm;
- if you are seeking employment with us, we may collect Personal Information relating to your suitability as an employee as part of our recruitment process; and
- if using our websites, we may use the Personal Information contained in cookies to track the use of our websites.

4.2. We collect the above information in order to provide services and products to you or to inform you of services and products we may provide to you. Our use of your information is based on the performance of a contract to which you are party to enable us to provide authorised products and /or services to you.

4.3. What is the legal basis associated with the main purpose?

The legal basis for processing Personal Information will vary according to the product that you hold or the service for which you have subscribed. In all cases, there will be a lawful reason to use and process your Personal Information which is called 'lawfulness of processing'. Examples of 'lawfulness of processing' are as follows:

- The processing of Personal Information is necessary for the performance of a contract to which you are party where we are assessing your application and setting you up as an investor, administering and managing your investment, providing all related services, handling any changes to your data, making payments to you and communicating with you.
- The processing of Personal Information is necessary for our legitimate interest where we are providing you with information about our products or services. The processing of Personal Information is necessary for the performance of a contract where we maintain a business relationship with you or your firm.

- The processing of Personal Information is necessary for us to meet our legal and regulatory obligations where a regulator requires us to maintain certain records of any dealings with you.
- The processing of Personal Information is necessary for our legitimate interest where we need to use your Personal Information to establish, exercise or defend our legal rights. For example, when we need to consult a solicitor or manage any legal claims, or where we want to pursue any legal claims ourselves.
- The processing of Personal Information is necessary for reasons of public interest where we need to use your Personal Information to carry out anti-money laundering checks or investigate fraud, or meet our 'Know Your Customer' (KYC) obligations.

If you do not provide the Personal Information requested, we may be unable to provide certain products or services to you.

We will also request your consent prior to processing certain types of Personal Information such as data related to your health, racial or ethnic origin, or sexual orientation, amongst others (known as **Special Category Information** under the EU's General Data Protection Regulation (**GDPR**)), and before providing marketing information to you.

## 5. How do we use your personal information?

The following are examples of how and why we might collect and process your Personal Information:

Why we need your Personal Information	Personal Information we may process shall include, but shall not be limited to:	Lawful processing condition – to:
To review your investment application (including tax and domicile status).	Your name, contact details, date of birth, any Government issued identifiers, address for tax purposes and similar information for other individuals included in your investment, such as beneficiary details.	<ul style="list-style-type: none"> <li>• provide you with your investment (contract)</li> <li>• meet obligations imposed on us by tax authorities and regulator (legal obligation)</li> </ul>
To administer, provide and service your investment.	Your name, contact details, date of birth, any Government issued identifiers, address for tax purposes and similar information for other individuals included in your investment, such as beneficiary details, your investment performance information and your bank account details.	<ul style="list-style-type: none"> <li>• provide you with your investment (contract)</li> <li>• meet obligations imposed on us by tax authorities and the regulator (legal obligation)</li> <li>• to receive payments from you and to make payments to you (contract)</li> </ul>

Why we need your Personal Information	Personal Information we may process shall include, but shall not be limited to:	Lawful processing condition – to:
<p>To regularly communicate with you.</p>	<p>Your name, contact details and any information relevant to your investment and similar information for other individuals included in the investment, such as beneficiaries.</p> <p>Investment performance information.</p> <p>Health information if you request communication in Braille or other easier to read formats.</p>	<ul style="list-style-type: none"> <li>• provide you with your investment (contract)</li> <li>• meet obligations imposed on us by tax authorities and regulator (legal obligation)</li> <li>• receive payments from you and to make payments to you (contract)</li> <li>• Subject to your consent, any Special Category Information relating to health will only be processed to provide you with relevant material</li> </ul>
<p>To resolve any complaints you may have.</p>	<p>Your name, contact details and any information relevant to your investment and similar information for other individuals included in the investment, such as beneficiaries.</p>	<ul style="list-style-type: none"> <li>• resolve any complaints (legal obligation and our legitimate interest)</li> </ul>
<p>To prevent financial crime such as money laundering, sanctions breaches, tax evasion and fraud.</p>	<p>Your name, contact details, date of birth, any Government issued identifying number, address for tax purposes and similar information for other individuals included in the investment, such as beneficiaries.</p> <p>Your bank account details.</p>	<ul style="list-style-type: none"> <li>• provide you with your investment (contract)</li> <li>• meet obligations imposed on us by tax authorities and regulator (legal obligation)</li> <li>• any Special Category Information or data relating to criminal convictions will only be processed to prevent financial crime (legal obligation)</li> </ul>

Why we need your Personal Information	Personal Information we may process shall include, but shall not be limited to:	Lawful processing condition – to:
For administrative purposes, e.g. maintaining accounting records, analysis of financial results, internal audit requirements, or receiving professional advice.	Your name, contact details, date of birth, any Government issued identifier, address for tax purposes and similar information for other individuals included in the investment, such as beneficiaries.  Investment performance information.	<ul style="list-style-type: none"> <li>• maintain appropriate records to monitor performance and evaluate business performance (our legitimate interest)</li> <li>• meet obligations imposed on us by tax authorities and regulator (legal obligation)</li> </ul>
To comply with our legal or regulatory obligations.	Your name, contact details and any information relevant to your investment and similar information for other individuals included in the investment, such as beneficiaries.	<ul style="list-style-type: none"> <li>• meet obligations imposed on us by tax authorities and regulator (legal obligation)</li> </ul>

## 6. With whom do we share personal information?

6.1. We will only disclose your Personal Information in accordance with applicable laws and regulations. In some instances, this will include sharing your Personal Information with third parties such as:

- A financial services regulator, a privacy law regulator (such as a privacy or data protection authority), the police or other related authority that may require disclosure on legal grounds, or other relevant government departments where reasonably necessary for financial crime and sanction compliance purposes.
- Service providers engaged by us to assist us in providing services to you. These service providers may include: cloud storage providers, mail-houses, IT system suppliers, auditors, lawyers, marketing agencies, document management providers and tax advisers.
- Your legal representative, your financial advisor or an individual to whom you have authorised us to share your Personal Information.
- Our third party investment product and service administrators.
- Identity and verification agencies.
- Other parties in commercial relationships with us including financial organisations and advisors where necessary to enable us to provide our service to you.
- Any member of our organisation which includes our ultimate holding company and its subsidiaries (from time to time) as necessary to provide services to you.

We have adopted the GDPR to inform our global Privacy and Data Protection standard. EU residents are advised that some third parties (including our subsidiaries and service providers) that provide related services may be outside of the European Economic Area. We will require that any such subsidiary or third party service provider has put in place adequate safeguards to ensure that your Personal Information is held securely and in accordance with this Policy. Such steps will include placing the party to whom we are transferring Personal Information under a contractual obligation to protect your Personal Information to GDPR standards. Transfer of Personal Information between our entities will be covered by an agreement entered into by those entities which contractually obliges each entity to ensure that your Personal Information receives an adequate and consistent level of protection wherever it is transferred within our organisation.

## **7. How do we keep your personal information secure?**

- 7.1. We store Personal Information in secure databases and in secure cloud environments. We take appropriate security measures to protect such Personal Information from misuse, interference and loss, as well as unauthorised access, modification or disclosure.

We take protection of your Personal Information and our system security very seriously. Any Personal Information that is collected, processed or stored will have appropriate safeguards applied in line with our data protection obligations. We have also designed and implemented controls to minimise loss of, or damage to, your Personal Information by human error, negligence or malicious intent and engage internal and external auditors to conduct regular, independent assurance exercises across our business to ascertain the effectiveness of our security control environment and our security strategy.

Our employees also protect your Personal Information whenever they are processing it and must undergo regular training on privacy and data protection requirements.

Our security controls are aligned to industry standards and good practice; providing a control environment that effectively manages risks to the confidentiality, integrity and availability of your Personal Information.

All exchanges of Personal Information between you and our websites go through encrypted channels in order to prevent interception of your Personal Information. Public access to your Personal Information via our websites or any web-hosted platform is protected by a login using a personalised user ID and password. You should ensure that your user ID and password are kept secret and not divulged to other people. As our websites are grouped to the internet which is inherently insecure, we cannot guarantee the Personal Information you supply will not be intercepted while being transmitted over the internet. Therefore, your use of our websites is entirely at your own risk. Accordingly, we accept no responsibility or liability for the security of Personal Information transmitted by you through our websites.

## **8. For how long will we store your personal information?**

- 8.1. We generally hold your Personal Information on our systems for as long as is necessary to provide our services to you. The length of time for which we keep your Personal Information will depend on the services we provide to you and their relevant regulatory requirements in your jurisdiction. Our websites use Google Analytics where a record of some of your Personal Information (e.g. IP address) may be retained for up to 38 months depending on your jurisdiction.



- 8.2. We typically keep Personal Information for up to a maximum retention period of 10 years from the date you cease to use the Services, depending on the jurisdiction where your Personal Information is held. In some cases, where there may be a dispute or a legal action, we may be required to keep Personal Information for a longer period.

When it is no longer required, we will take steps to delete, destroy, or de-identify your Personal Information. Where we are able to de-identify your Personal Information so that it can no longer be associated with you, we may retain that information indefinitely without notice to you.

## 9. Your lawful rights

- 9.1. Each jurisdiction grants individuals certain lawful rights in respect of their Personal Information. In some jurisdictions, additional rights are available to individuals – these are outlined in Schedule B. The rights that Link Group adopts in all jurisdictions include:

- **Right to lodge a complaint** – You have a right to lodge a complaint to us at any time if you object to the way in which we have used or managed your Personal Information. Where you are dissatisfied with our response, you also have the right to escalate your complaint to the relevant regulator in your jurisdiction. Further information can be located on the applicable regulator’s website (see Schedule D).
- **Right of access** – All individuals have a right to access their Personal Information held by an organisation. There will not usually be a charge to you for us to respond to these requests. However, where the request is deemed by us to be excessive, you may be charged a fee for our providing you a record of your Personal Information that is held by us. Your Personal Information will usually be provided to you in hard copy, unless otherwise requested. Where you have made the request to receive a record of your Personal Information held by us by electronic means, we will endeavour to provide the data in the requested format where we are able to do so.
- **Right of rectification** – We take reasonable steps to ensure that the Personal Information we collect and hold about you is accurate and complete. However, if you do not believe this is the case, you have the right to request we rectify the inaccuracy at any time.
- **Right to opt out from receiving any direct marketing** – You can ask us to stop sending you marketing messages at any time. Please see below for instructions on how you can do this.
- **Right not to be subjected to automated-decision making** (that is, using technology solutions rather than human judgement to automatically determine outcome – e.g. assessment of credit worthiness) – we do not make decisions about you using automated decision making or by automated profiling to evaluate things about you using your Personal Information.

- 9.2. If you would like to exercise any of the above rights, please refer to Schedule C for the contact details for your jurisdiction. In some circumstances, exercising some of these rights may result in us being unable to continue providing you with a prescribed service and/or our business relationship with you. Please note that in some cases we may not be able to comply with your request for legal reasons. Where we are unable to comply with your request, we will also inform you of the reasons why.

## Marketing

- 9.3. You are in control of how we use your Personal Information for marketing purposes. We will only contact you if you have provided your consent to receive marketing materials, have purchased a product or service through us or have expressed an interest in attending one of our events. In these circumstances, we may share your Personal Information with other relevant businesses to inform you of other similar products and services that may be of interest to you, unless you advise us otherwise.
- 9.4. If you wish to unsubscribe from any marketing emails sent by us, you may do so at any time by following the unsubscribe instructions that appear in the marketing email, or by contacting us using the details set out in this Policy.

## 10. How do Link Group websites use my internet protocol (IP) address and collect cookies?

- 10.1. Like most organisations using websites to engage and conduct business with individuals, each time you use any of our websites, we will automatically collect certain technical information, including the type of browser you use, the Internet Protocol (IP) address used to connect your computer to the internet, and information about your visit, including the full Uniform Resource Locations (URL), clickstream to, through and from our sites, traffic data and other communication data, the resources that you access, and the information derived from the cookies we place on your mobile device and/or computer.
- 10.2. In order to improve the quality of our websites and services, we may from time to time send a "cookie" to your computer. Cookies are text files that identify your computer to our server and are stored on your device. Cookies in themselves do not identify the individual user, just the computer used. We use cookies to improve your user experience by avoiding the need for you to enter the same information more than once. They also allow us to analyse user behaviour to improve the functionality and performance of our websites.

We comply with the cookie regulations as stated in the jurisdictions within which we operate. There are two types of cookies that can be stored on your device:

- "session cookies", which only last for the duration of your visit to our websites and are automatically deleted from your device when you close your browser; and
- "persistent cookies", which remain on your device after you have visited our websites and are not deleted when you close your browser. Persistent cookies are sent back to our server every time you visit our websites.

Session cookies are not used for tracking purposes but are essential to maintaining security throughout the websites. They are also used to help us remember your movements from page to page by avoiding the need for you re-enter the same information. Session cookies are held in memory and expire when you leave our websites.

Where a third party provider places a cookie via a Link Group website, the name and purpose of that cookie is listed on the 'Cookies' link at the bottom of the website.

Other than the data collected by cookies, we do not collect any other Personal Information from your disk or computer and will only collect a copy of the data held by the cookie for inclusion in any analysis performed by us to improve our website functionality and performance. We use full Secure Socket Layer (SSL) protocols when collecting visitor information on secure pages; this ensures the website's security is not compromised. We

encrypt all transmitted visitor information (even from non-secure pages), so no one else can read the data we gather.

On your first visit to any of our websites we will seek your consent to use cookies of the type outlined above. Most users will be able to adjust their internet settings to accept all cookies, to notify them when a cookie is issued, or not to receive cookies at any time. The last of these means that certain personalised services cannot then be provided to the user. Please note that websites to which our websites may be linked may also make use of their own cookies. You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you block all cookies (including essential cookies) you may not be able to access all, or parts of, our websites.

A full listing of the cookies used by Link Group web pages, and information on how to manage or delete cookies, is available by clicking on the 'Cookies' link at the bottom of each Link Group website.

## 11. Following links from our websites

- 11.1. Our websites may contain links to other websites that may make use of their own cookies technology and will have their own privacy policies. You should carefully review the privacy policies and practices of other websites that we do not control as we do not accept any liability for the privacy practices of such third party websites.

## 12. Social media

- 12.1. We use a third party provider, LinkedIn, to manage our social media interactions. If you send us a private or direct message via social media, it will be stored by LinkedIn for the period of time your account is in existence.

We see all this information and decide how we manage it. For example, if you send a message via social media that needs a response from us, we may process it in our contact management system as an enquiry or a complaint. When contacting Link Group through a social media platform, we suggest you also familiarise yourself with the privacy information on that platform.

## 13. Changes to this policy

- 13.1. Please note that this Policy will be reviewed and may be changed from time to time. Any changes we make to this Policy in the future will be posted to our websites.

## 14. Who can you speak to about this policy?

- 14.1. Questions or comments regarding the exercise of your rights or this Policy are welcomed and should be addressed to the relevant Privacy or Data Officer for your jurisdiction as detailed in Schedule C.
- 14.2. If you wish to make a complaint on how we have handled your Personal Information, you can contact the representative in your jurisdiction as listed in Schedule C. If you believe we are not processing your Personal Information in accordance with the law or are not satisfied with our response or its timeliness, you have the right to complain to the relevant privacy/data supervisory authority responsible for the regulation and enforcement of data protection law in your jurisdiction. These are also listed in Schedule D.

## Schedule A: Link Group business unit websites by division

Corporate Markets	Retirement & Superannuation Solutions
<p><b>Corporate Markets –</b>  Australia  <a href="https://www.linkmarketservices.com.au/corporate/home.html">https://www.linkmarketservices.com.au/corporate/home.html</a>  New Zealand  <a href="https://www.linkmarketservices.co.nz/">https://www.linkmarketservices.co.nz/</a>  Germany  <a href="https://www.linkmarketservices.de/">https://www.linkmarketservices.de/</a>  Hong Kong  <a href="https://www.linkmarketservices.hk/corporate/">https://www.linkmarketservices.hk/corporate/</a>  United Kingdom  <a href="https://www.linkgroup.eu/how-well-help-your-business/solutions/corporate-markets/">https://www.linkgroup.eu/how-well-help-your-business/solutions/corporate-markets/</a></p>	<p><b>AAS – Australia</b>  <a href="https://www.aas.com.au/">https://www.aas.com.au/</a>  <b>Link Advice – Australia</b>  <a href="http://linkadvice.com.au/">http://linkadvice.com.au/</a>  <b>Super Clearing House Online – Australia</b>  <a href="http://www.sch-online.com.au/Home/">http://www.sch-online.com.au/Home/</a></p>
<p><b>Link Intime – India</b>  <a href="https://linkintime.co.in/">https://linkintime.co.in/</a></p>	<p><b>Banking &amp; Credit Management</b></p>
<p><b>Orient Capital – Australia, Hong Kong and United Kingdom</b>  <a href="https://www.orientcap.com/">https://www.orientcap.com/</a></p>	<p><b>Banking &amp; Credit Management – Ireland, United Kingdom, the Netherlands and Italy</b>  <a href="https://www.bcmglobal.com">https://www.bcmglobal.com</a></p>
<p><b>D.F. King – France, Germany, Hong Kong, and United Kingdom</b>  <a href="http://www.dfkingltd.com/">http://www.dfkingltd.com/</a></p>	<p><b>Fund Solutions</b></p>
<p><b>Link Market Services including Treasury Services – United Kingdom, Jersey, Guernsey and the Isle of Man</b>  <a href="https://www.linkgroup.eu/services/services/treasury/">https://www.linkgroup.eu/services/services/treasury/</a></p>	<p><b>Link Fund Solutions</b>  United Kingdom  <a href="http://www.linkfundsolutions.co.uk/">http://www.linkfundsolutions.co.uk/</a>  Ireland  <a href="https://www.linkgroup.eu/services/services/ireland-management-company/">https://www.linkgroup.eu/services/services/ireland-management-company/</a>  Luxembourg  <a href="https://www.linkgroup.eu/services/services/luxembourg-management-company/">https://www.linkgroup.eu/services/services/luxembourg-management-company/</a></p>
<p><b>Company Matters</b>  Australia  <a href="https://www.companymatters.com.au/">https://www.companymatters.com.au/</a>  United Kingdom  <a href="https://www.linkgroup.eu/services/services/governance/">https://www.linkgroup.eu/services/services/governance/</a></p>	<p><b>Technology &amp; Operations</b></p>
<p><b>Pacific Custodians</b>  Australia and New Zealand  <a href="https://linkmarketservices.com.au/corporate/ClientServices/Trustee-Services.html">https://linkmarketservices.com.au/corporate/ClientServices/Trustee-Services.html</a></p>	<p><b>Link Digital Solutions – Australia</b>  <a href="https://www.linkdigitalsolutions.com/">https://www.linkdigitalsolutions.com/</a>  <b>SyncSoft – Australia</b>  <a href="https://www.syncsoft.com.au/">https://www.syncsoft.com.au/</a>  <b>Link Digicom – Australia</b>  <a href="http://www.linkdigicom.com.au/">http://www.linkdigicom.com.au/</a></p>
	<p><b>Empirics – Australia</b>  <a href="https://www.empirics.com.au/home/">https://www.empirics.com.au/home/</a></p>

## Schedule B: Additional Privacy Requirements

**For European Union (EU) residents, the following additional rights apply globally:**

**Right to erasure** – you have the right to require us to delete your information if our continued use is not justified. However, this will need to be balanced against other factors, depending upon the type of personal information we hold about you and why we have collected it, there may be some legal and regulatory obligations which mean we cannot comply with your request.

**Right to restrict processing** – in some circumstances, although you may not be entitled to require us to erase your information, you may be entitled to limit the purposes for which we can use your information.

**Right of data portability** – you have the right to require us to provide you with a copy of the personal information that you have supplied to us in a commonly used machine-readable format or to transfer your information directly to another controller (e.g. a third party offering services competing with ours). Once transferred, the other party will be responsible for looking after your personal information.

**Right to withdraw consent** – for certain limited uses of your personal information, we may ask for your consent. Where we do this, you have the right to withdraw your consent to further use of your personal information. If you withdraw your consent, we may not be able to provide certain products and services to you. If this is the case, we'll tell you at the time you ask to withdraw your consent.

In some circumstances exercising some of these rights will mean we are unable to continue providing you with your investment or maintaining a business relationship with you.

**For Australian residents, the following additional rights apply globally:**

**Personal Information** includes **Sensitive Information** and is referred to as Special Category Information in this policy. It also includes the following information for individuals in Australia:

- Trade union and/or political party affiliation; and
- Criminal record

**Anonymity and pseudonymity** – Individuals dealing with us have the option of being anonymous or using a pseudonym unless we:

- are required or authorised by law or a court or a tribunal order to deal with identified individuals; or
- it is impracticable for us to deal with you if you have not identified yourself.

**If we are unable to collect your personal information** – In addition to not being able to provide certain products or services to you, the following may also occur:

- we may not be able to provide you with information that you requested;
- we may not be able to offer you employment with us; and / or
- you may be subject to additional taxation or your assets or entitlements could be transferred to ASIC, the ATO or to State revenue offices.

**Dealing with unsolicited personal information** – Generally, most information received by us is immediately and automatically recorded (i.e. most telephone calls are electronically recorded and most documents received are scanned into an electronic image.) This is necessary because we are a trusted third party record keeper, providing technical, administrative, support and/or financial services involving day-to-day money and security asset movements, where imprecise record keeping may have significant adverse consequences.

Where it becomes apparent that a communication contains unsolicited personal information that could not otherwise lawfully be requested or used, we will make reasonable efforts to delete, destroy or de-identify the record. Where it is impracticable to do this (for example, the unsolicited information is combined with necessary information), the record will be retained, subject to the safeguards detailed in this privacy policy.

**Links to third party websites** – our websites may contain links to other websites operated by third parties. We cannot, and do not, make any representations or warranties in relation to the privacy practices of any third party website and are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing relevant individuals about their own privacy practices.

**Disclosing your personal information outside of Australia** – As part of providing services to you and in our capacity as a service provider, occasionally personal information may be stored or processed at locations outside of Australia.

We may disclose personal information to corporate and third party suppliers and service providers located overseas for some of the purposes listed in section 4 of this policy. They include: data hosting organisations, IT service providers, and other third party vendor/suppliers located overseas.

Those countries that we may disclose your personal information to that are located outside of Australia, include: China (Hong Kong), France, Germany, India, Luxembourg, New Zealand, Papua New Guinea, South Africa, the Philippines, and the United Kingdom, the United States of America, and United Arab Emirates as at the date of this policy.

**Enquiries and Complaints** – Individuals may lodge an enquiry with us directly at any time. Complaints should be lodged with us in the first instance and will be dealt with efficiently in accordance with our established internal dispute resolution processes. If you are not satisfied with how your complaint has been managed or if we have not responded to your complaint within 30 days, you may escalate your complaint to the regulator – refer to Schedule D of this policy.

We encourage individuals wishing to make enquiries or lodge a complaint about how we handle personal information to do so using any of the following means:

**Telephone:** + 61 1800 502 355 (free call within Australia)  
9am–5pm (Sydney time), Monday to Friday (excluding public holidays),

**Email:** [privacy.officer@linkgroup.com](mailto:privacy.officer@linkgroup.com);

**Post:** Attn: Privacy Officer  
Link Group  
Locked Bag A14  
Sydney South NSW 1235

**Schedule C: Link Group Privacy / Data Officer contact per jurisdiction**

Australia	EU*	India	Hong Kong	South Africa	New Zealand
<a href="mailto:Privacy.officer@linkgroup.com">Privacy.officer@linkgroup.com</a>	<a href="mailto:Data.protectionoffice@linkgroup.co.uk">Data.protectionoffice@linkgroup.co.uk</a>	<a href="mailto:Privacy.officer@linkgroup.com">Privacy.officer@linkgroup.com</a>	<a href="mailto:Privacy.officer@linkgroup.com">Privacy.officer@linkgroup.com</a>	<a href="mailto:Privacy.officer@linkgroup.com">Privacy.officer@linkgroup.com</a>	<a href="mailto:Privacyofficer@linkmarketservices.co.nz">Privacyofficer@linkmarketservices.co.nz</a>

***\*EU member countries where Link Group currently operates include: France, Germany, Ireland, Italy, Luxembourg, Netherlands and the United Kingdom***

## Schedule D: Regulatory authority per jurisdiction

	Country	Authority Name	Website	Contact Details
	<b>Australia</b>	Office of the Australian Information Commissioner (OAIC)	<a href="http://www.oaic.gov.au">www.oaic.gov.au</a>	GPO Box 5218, Sydney NSW 2001 T 1300 363 992 <a href="mailto:enquiries@oaic.gov.au">enquiries@oaic.gov.au</a>
<b>EUROPEAN UNION</b>	<b>United Kingdom</b>	Information Commissioner's Office	<a href="http://www.ico.org.uk">www.ico.org.uk</a>	Wycliffe House, Water Lane Wilmslow, Cheshire SK9 5AF T +0303 123 1113 (or +44 1625 545745 if calling from overseas) F 01625 524510
	<b>Germany</b>	Germany has a Data Protection Authority for each of the 16 German states ( <i>Länder</i> ).		
	<b>France</b>	The « Commission Nationale de l'Informatique et des Libertés » or « CNIL »	<a href="https://www.cnil.fr/en/home">https://www.cnil.fr/en/home</a>	3 place de Fontenoy TSA 80175 75334 Paris Cedex 07 1. 01 53 73 22 22 53 73 22 00
	<b>Netherlands</b>	The Dutch Data Protection Authority ( <i>Autoriteit Persoonsgegevens</i> )		Autoriteit Persoonsgegevens, Postbus 93374, 2509 AJ DEN HAAG Telephone number: (+31) - (0)70 - 888 85 00



Country	Authority Name	Website	Contact Details
<b>Ireland</b>	<i>An Coimisinéir Cosanta Sonraí</i> (or the Data Protection Commission)	<a href="http://www.dataprotection.ie">www.dataprotection.ie</a>	<b>Dublin:</b> 21 Fitzwilliam Square, Dublin 2, D02 RD28, Ireland <b>Regional Office:</b> Canal House, Station Road, Portarlington, R32 AP23 Co. Laois Telephone: +353 57 868 4800
<b>Luxembourg</b>	Commission Nationale pour la Protection des Données (CNPD)		Avenue du Rock'n'Roll, L-4361 Esch-sur-Alzette, T: +352 26 10 60 1 F: +352 26 10 60 29
<b>Jersey</b>	Jersey Office of the Information Commissioner	<a href="https://jerseyoic.org">https://jerseyoic.org</a>	2 <sup>nd</sup> Floor, 5 Castle Street, St Helier, Jersey, JE2 3BT. T +44 (0) 1534 716530
<b>Guernsey</b>	The Office of the Data Protection Authority	<a href="https://odpa.gg">https://odpa.gg</a>	St Martin's House, Le Bordage, St. Peter's Port, Guernsey, GY1 1BR
<b>Isle of Man</b>	Isle of Man Information Commissioner,	<a href="https://www.inforights.im">https://www.inforights.im</a>	PO Box 69, Douglas, Isle of Man, IM99 1EQ T +44 1624 693260
<b>Hong Kong</b>	The Office of the Privacy Commissioner for Personal Data	<a href="http://www.pcpd.org.hk/">http://www.pcpd.org.hk/</a>	12/F, Sunlight Tower, 248 Queen's Road East Wanchai, Hong Kong T +852 2827 2827 F +852 2877 7026
<b>India</b>	<b>No authority currently exists</b>		
<b>South Africa</b>	Information regulator	<a href="http://www.justice.gov.za/inforeg/contact.html">www.justice.gov.za/inforeg/contact.html</a>	<a href="mailto:inforeg@justice.gov.za">inforeg@justice.gov.za</a> 012 406 4818

Country	Authority Name	Website	Contact Details
<b>New Zealand</b>	The Privacy Commissioner's Office	<a href="http://www.privacy.org.nz">www.privacy.org.nz</a>	Level 4, 109-111 Featherston Street Wellington 6143, New Zealand  T +64 474 7590 F +64 474 7595 <a href="mailto:enquiries@privacy.org.nz">enquiries@privacy.org.nz</a>

**Connotes Link Group EMEA offices**