

## Trustees Australia Limited's Commitment to Privacy

Trustees Australia Limited (the **Company**) respects the privacy of the individuals who interact with it or whose personal information it collects indirectly, and is committed to protecting the privacy of those individuals. This Statement sets out some key information about Trustees Australia's approach to privacy.

### The Kind of Personal Information We Collect and Why

The main kind of personal information the Company usually collects and holds include personal information about individuals who are current and former:

- Staff and applicants for employment with the company.
- members of the fund or Trusts which the Company provides custodial services for.
- members of the Company Board, or the audit committee of the Company's subsidiaries.
- executives and other staff of other organisations with which the Company or its subsidiaries deals or interacts in the course of performance of its functions and powers including executives and other staff in government or another regulator or government agency in Australia or overseas, financial institutions, global development institutions, payment system providers, payment system participants, payments industry associations and their members and clearing and settlement facility applicants and licensees.
- signatories and other operatives on accounts including signatories on bank accounts and custody arrangements or official institutions, contract authorities, verifying officers and signatories on accounts held by government agencies and signatories on staff, or staff association bank accounts
- staff of other vendors, suppliers and professional and other service providers to the Company and of organisations tendering to provide goods or services to the Company.
- staff of the Company's landlords and tenants.
- individuals on sanctions lists.
- individuals who register to access any secure website or portal hosted by the Company and its subsidiaries.
- media contacts.
- speakers at and participants in conferences and workshops hosted or arranged by the Company.
- signatories signing on behalf of counterparties to contracts with the Company.

The type of personal information we collect about each of these groups of people varies. In some limited instances (primarily people in the first three categories above) it includes sensitive information such as membership of professional or trade associations and criminal record. In many cases where the Company collects the personal information of executives or staff of another entity, the information is limited to business or professional contact details.

We may ask for personal information because we are required to collect it for legal reasons. For example, legislation such as the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* may require us to ask for personal information to check and verify the identity of an individual.

The Company also collects the personal information of members of the public if they:

- request information or make a complaint.
- ask to be placed on a mailing list.
- make submissions to the Company; or
- seek assistance from an employee via the telephone or email.

Please note it is not practicable to provide the requested information or assistance or accept the submission without having that personal information. Members of the public may be able to interact with us anonymously where this is lawful and practicable.

When we collect your personal information we usually tell you how we are likely to use and disclose it unless that is obvious from the context in which it is collected. You can obtain more detailed information on these matters by contacting our Compliance Coordinator, or by reading the privacy notice we give you when we collect your information.

### **How We Collect Personal Information**

If it is reasonable and practical to do so, we collect personal information directly from you. We may do this through application or other forms, over the telephone, the internet or in person. We may also need to collect personal information about you from other people. Sometimes this may happen without your direct involvement. For example, we may collect information about:

- staff in entities with which we deal from other staff within those entities
- vendors, suppliers, service providers and other contract counterparties or their office holders from company, business name and ABN searches of the relevant records held by the Australian Securities and Investments Commission or the Department of Industry
- individuals who are recipients of Australian government payments or debtors to the Australian government or its agencies from the Australian government or the governmental agency to which the Company is supplying the relevant payment or collection services
- job applicants from referees nominated by those applicants.

### **Sharing Personal Information with Entities Overseas**

The Company discloses some personal information to entities outside Australia. For example:

- disclosure of personal information to foreign governments for the purpose of obtaining visas for staff travelling overseas on company business
- disclosure of account and other details of the intended beneficiary of a payment to be made to an individual outside Australia to relevant financial institutions involved in processing the payment (and possibly, in limited circumstances, to regulatory bodies overseas); and
- exchange with an entity overseas of personal information of Company staff and staff of that entity for the purpose of one of the Company's functions or powers (for example to arrange and facilitate participation in international regulatory or currency forums and otherwise to engage with other financial sector agencies on matters of common interest, to engage in research and development activities with overseas entities or to obtain services from overseas suppliers).

It is not practicable to list all the countries potentially involved, but information may be shared for one or more of these purposes with entities in the United States and New Zealand. In

particular circumstances we may be required by legislation in Australia or overseas to provide information about financial dealings and income and an example of this is where funds distributed to USA citizens or residents must be declared to the Australian Taxation Office under the *Foreign Account Tax Compliance Act. (FATCA)*.

### **Security of Personal Information**

The Company is committed to protecting and securing the personal information it holds. We employ appropriate technical, administrative and physical procedures to protect personal information from misuse, interference and loss and from unauthorised access, modification or disclosure. We limit access to personal information to staff with a legitimate need to use it consistent with the purpose for which the information was collected. The Company's Code of Conduct requires Company staff to take all reasonable steps to appropriately safeguard and protect personal information, and not to use personal information inappropriately.

### **Amendment of and Access to Personal Information**

It is important that the personal information we collect is and remains accurate, complete and up-to-date. We encourage you to help us by telling us promptly if any of your personal information changes (for example you change your name, phone number or address).

You can ask for access to the personal information the Company holds about you. You may ask us to correct our record of your personal information. If you wish to access any personal information the Company holds about you, or amend or correct your personal information, you can forward your request to:

For access to or amendment of any other information:

**Phone** +61 7 3020 3020

The Compliance Coordinator  
Trustees Australia Limited

**Postal Address** GPO Box 6  
BRISBANE QLD 4001  
AUSTRALIA

**Email** [shareholders@trusteesau.com.au](mailto:shareholders@trusteesau.com.au)

If the privacy notice we give you when we collect your personal information provides other contact details for an access or correction request then you can also use those contact details.

We ask that you identify the information requested as clearly as possible. We will deal with your request to provide access to or correction of your personal information within 30 days of receipt of your request.

In some situations permitted by law the Company may deny your request for access or correction. If we do this we will tell you why.

You may also have rights to access your personal information under the *Freedom of Information Act 1982*.

## Enquiries and Complaints

If you would like more information about the Company's approach to privacy, or you think the Company has breached the Australian Privacy Principles or you have any other concern about the way the Company has handled your personal information, please contact our Compliance Coordinator by:

**Phone:** +61 7 3020 3020

The Compliance Coordinator  
Trustees Australia Limited

**Postal Address:** GPO Box 6  
BRISBANE QLD 4001  
AUSTRALIA

**Email:** [shareholders@trusteesau.com.au](mailto:shareholders@trusteesau.com.au)

If you have concerns about the Company's handling of any personal information we may ask you to put them in writing so that we can fully understand and investigate the issues you have raised.

If in a particular case an investigation of a complaint is required, the Company will determine the form and timing of the investigation and the person to conduct the investigation having regard to:

- the general desirability of confidentiality of investigations into privacy matters
- the need to ensure that the investigation is conducted fairly
- the nature of the personal information and the concern that you have raised
- the desirability of conducting the process quickly and efficiently; and
- the need to ensure that the outcome of the investigation is accurate and reliable.

## Further Information on Privacy

You can obtain further general information about your privacy rights and privacy law from the Office of the Australian Information Commissioner by:

**Phone** [1300 363 992](tel:1300363992)

The Australian Information Commissioner

**Postal Address** GPO Box 5218  
SYDNEY NSW 1042  
AUSTRALIA

**Website** <http://www.privacy.gov.au>