

At Schroder Investment Management Australia Limited (Schroders) (ABN 22 000 443 274, AFLS 226473), we recognise the importance of your personal information. We appreciate that you may have concerns about your privacy and about the confidentiality and security of your personal information.

Schroders is committed to providing you with quality financial services and products within a secure and private environment. This privacy statement describes how we manage your personal information and safeguard your privacy.

Privacy Principles

Schroders is subject to the requirements of the Australian Privacy Principles (APP), which are contained in the Privacy Act 1988 (the Privacy Act) as amended from time to time and which govern how private sector organisations handle personal information.

Personal Information and Collection

Schroders will only collect information that is necessary for the primary purpose of:

- providing you with our services and products or with information you have requested
- notifying you about other Schroders services or promotions from time to time
- identification purposes as required for anti-money laundering and counter-terrorism financing purposes or other Australian or extraterritorial taxation, legal or regulatory obligations
- managing our relationship with you.

We endeavour to collect personal information in a lawful and non-obtrusive way. The types of personal information that Schroders collects and maintains generally comprises:

- your name
- contact details such as telephone numbers, address and e-mail address
- birth date
- tax file number
- bank account details
- citizenship
- other information that may be required for identification or taxation purposes.

Sensitive Information

Generally, unless required by law, Schroders does not collect sensitive information about you (e.g. information about your religion, race, political views, criminal convictions, health information or membership of professional or trade associations or unions). If we need to collect sensitive information about you we will only do so with your consent or where it is required by law.

How we collect Personal Information

We will usually collect your personal information directly from you, unless you have appointed an agent or broker to act on your behalf.

We may collect your personal information in a variety of different ways including:

- Direct from you when you complete an application form (either hard copy or on-line application forms), when you contact us via email or telephone or when you participate in surveys or competitions or promotions or add your name to any mailing lists.
- From third parties when you have provided authority for us to do this, e.g. from attorneys, financial advisers, platform providers, brokers, lawyers, identification verification service providers.
- From public or commercially available sources for the purposes of complying with customer due diligence obligations or to ensure contact details are up to date and accurate.

Telephone Call Recording

Schroders may record and monitor telephone calls for security, training and compliance purposes in the following two instances:

- calls to and from our dealers and fund managers may be recorded and archived in order to maintain electronic records of deals
- calls to and from our customer services department may be recorded for security, training and monitoring purposes, including disputes resolution and compliance monitoring purposes.

Use and Disclosure

Schroders will typically use personal information for the following purposes:

- to process your application for our products
- to verify your identity or other aspects of your application, including membership status
- to manage your investment with us
- to comply with applicable laws and regulations, including anti-money laundering, taxation and associated laws
- to inform you of other products or services or offers that may be of interest to you and to improve and customise our products and services
- to conduct product and market research, including product suitability assessments.

We will only use and disclose personal information about you for the purpose for which it is collected, unless consent has been obtained to use the information for additional purposes. Exceptions to this include where disclosure is:

- required by law
- reasonably necessary to assist a law enforcement agency
- reasonably required by a third party service provider to meet their legal or regulatory obligations
- required by external companies for the purposes of issuing statements and handling mail.

Schroders may disclose your personal information to:

- your attorney, financial adviser, platform provider, broker or any other person you have authorised
- professional services firms that have a legitimate need to access this information, such as lawyers, auditors
- electronic identification verification providers.

Transborder Data Flows

Schroders may disclose information to related entities, including Schroder Group entities located in Singapore, London and Luxembourg, or elsewhere that is part of the Schroder Group, provided that their privacy controls are at least substantially similar to the way in which the APP protect the information. Schroders may also disclose information to anyone acting on Schroders' behalf such as external service providers who supply administrative, financial or other services to assist Schroders in providing the financial services and products, anyone you have authorised, or government department or agencies within or outside of Australia.

Storage and security of information

Schroders stores personal information in a combination of computer storage facilities, paper-based files and other records. These are held on our premises and systems, which may be housed locally or in other Schroders' offices globally, as well as offsite using trusted third parties. Some personal information may be held by data service providers located overseas. Schroders maintains effective control of the information under contractual arrangements. Schroders may store personal information via "Cloud" storage solutions and in such cases the relevant servers may be located overseas. We will take reasonable steps to protect personal information from loss, interference or misuse, and unauthorised access, modification or disclosure.

Where personal information is no longer required to be retained, we will take such steps as are reasonable in the circumstances to de-identify or destroy the personal information.

Use of Service Providers

We may contract out some of our administrative and support functions such as mailing, payment or settlement services, product administration services, document and data storage, background checking or identity verification services to external service providers from time to time. Only information necessary for the service provider to carry out their function will be provided and will be subject to confidentiality clauses in the relevant services agreement.

Anonymity

Schroders is required to identify all investors prior to offering a designated service under Australian anti-money laundering and counter-terrorism financing laws. Therefore under such circumstances Schroders is unable to treat customers with anonymity.

Where legally permissible and practicable (and where the individual wishes to do so) Schroders may deal with the individual anonymously.

Links to Third Party Sites

Schroders may provide links to other websites. Schroders assumes no responsibility for the content or privacy practices of these sites. Once you link to another site, you will be subject to that site's privacy policy and terms and conditions.

Personal Information Quality and Access

Schroders endeavours to keep all personal information accurate, complete and as up to date as possible. To assist us with this, please contact us if any of the details you have provided change. In most cases you are able to access and update your information at any time. Please contact us if you think that we hold information about you that is incorrect in any way or out of date.

Schroders may charge a fee for supplying personal information.

Personal Information Security

Schroders is committed to keeping your information secure and we take all reasonable precautions to protect any information we hold about you. Reasonable steps are taken to destroy or permanently de-identify any personal information no longer required.

Cookies

Most websites use “cookies” to identify users and improve their browsing experience. Cookies are small text files that are downloaded on to a user’s device by websites that the user visits. Schroders uses cookies on this website to provide you with a better online experience and, in particular, to tell us how and when pages of our websites are visited, what our visitors’ technology preferences are and whether our websites function properly.

The cookies we use contain information sent to you by us, identify your computer and store information about your visits to our websites. If you visit one of our password-protected websites, we may use cookies or other similar technologies to help us recognise, authenticate and store your configuration and user attributes as well as to facilitate your navigation and entitlements throughout the relevant websites. We also use cookies to customise the content that is displayed so that the information made available is appropriate to you. These cookies and other similar technologies are encrypted, cannot be read and do not collect information that identifies a visitor. All the information that cookies collect is aggregated and therefore anonymous.

Most web browsers allow some control of most cookies through the browser settings. You can usually configure our browser to accept all cookies, reject all cookies, or notify you when a cookie is set. Each browser is different, so check the “Help” menu (or equivalent) of your browser to learn how to change your cookie preferences. You can decline our cookies if your browser permits, although doing this may prevent you accessing some of our online content or may even prevent access to certain of Schroders’ websites.

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.allaboutcookies.org.

By continuing to use this website without changing your settings you consent to our use of cookies as described above.

Policy Changes

From time to time our privacy statement may change and we may notify you about these changes.

Further Information and Complaints

If you have any questions about this privacy statement, if you wish to complain about how we have handled personal information about you, if you believe that we may not have complied with this Privacy Statement or the Privacy Act or if you wish to access or correct your personal information, please contact Schroders Privacy Officer by writing to or calling:

The Privacy Officer
Schroder Investment Management Australia Limited
GPO BOX 5059
Sydney NSW 2001.
Telephone: (02) 9210 9200

Our Privacy Officer will investigate your complaint and advise you of the outcome. If you are not satisfied with the outcome you can contact the Office of the Australian Information Commissioner.

The contents of this statement are subject to change and are not intended to create a contract between Schroders and any individual visiting this site or who provides us with their personal information.