

# PRIVACY STATEMENT

1 July 2019

## INTRODUCTION

Together, Equity Trustees Limited, Equity Trustees Superannuation Limited, Equity Trustees Wealth Services Limited, EQT Responsible Entity Services Pty Ltd, EQT Corporate Services Limited, EQT Holdings International and EQT Legal Services Pty Ltd of the EQT Holdings Limited Group (EQT Group). This is a related group of companies which provide diversified financial services including superannuation, corporate trustee, investment management and advice, and traditional trustee and executor services. In this Privacy Statement references to 'we', 'us' or 'our' are to the EQT Group.

We are committed to protecting your privacy and complying with the Australian Privacy Principles under the Privacy Act 1988 (Cth) ("the Act"). As part of our commitment and to explain how we collect, manage and handle your personal and/or sensitive information, we have developed our Privacy Statement.

## WHAT PERSONAL INFORMATION DOES THE EQT GROUP COLLECT ABOUT ME?

### Personal Information

The EQT Group needs to collect and hold personal information from you in order to provide its products and services to you, and to ensure compliance with certain legal and regulatory obligations.

The types of personal information we may collect include any of the following:

- name, gender and date of birth
- contact details, including telephone numbers, email and postal addresses;
- employment details such as your salary, superannuation contributions and employment status;
- bank account details;
- accounting records;
- Tax File Number and taxation records;
- statements of financial position regarding assets and liabilities;
- nominated beneficiaries of a superannuation fund;
- claims information;
- attitudes to investment risks;
- estate planning related information e.g. next of kin and family details; and
- charitable foundation related information.

We are required to collect and verify (through identification documents such as your passport or drivers licence) your name, address and date of birth under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth). We may also collect other information as may be required from time to time either to provide products and services to you or ensure compliance with the law.

## HOW DOES THE EQT GROUP COLLECT PERSONAL INFORMATION ABOUT ME?

We collect personal information from you in a variety of methods in the course of business. Examples of the way we collect personal information include:

- through communications between you and our representatives or advisers;
- your use of our website;



- you completing application forms in relation to our products and services;
- through other avenues, where required to meet regulatory requirements and comply with the law; and
- through marketing activities which request information from you, such as surveys.

Because our products and services are often offered by intermediaries such as financial planners, solicitors or accountants, we may collect personal information about you from these third parties.

You have the option of communicating with us anonymously or using a pseudonym if you prefer. For example, you may wish to withhold your personal information when making a general enquiry about a product or service we offer. However, we will refuse to provide a product or service where it is impractical or unlawful to do so without your personal information.

## **WHY DOES THE EQT GROUP COLLECT THIS INFORMATION?**

The EQT Group uses your personal information for the purpose of providing you with our products and services. For example, we may use your personal information to:

- assess applications you make for EQT managed funds or other financial products;
- provide you with taxation, financial planning, superannuation fund establishment and administration, estate, or trustee services;
- adequately administer, invest, pay or transfer your managed investments and/or superannuation benefits as required with EQT Group products;
- enable us to assist you with related services, as may be required from time to time.

## **UNSOLICITED INFORMATION**

‘Unsolicited’ personal information is personal information about an individual which EQT has unintentionally received. For example, this may occur when preparing wills and establishing beneficiary information. Where EQT obtains unsolicited information, we will protect this personal information with the same rigour as we treat personal information we intended to collect.

## **WILL THE EQT GROUP DISCLOSE MY PERSONAL INFORMATION TO THIRD PARTIES?**

We may need to disclose your personal information to third parties where it is necessary to provide one of our products or services to you. We take reasonable steps to ensure that any third party we disclose your personal information to is bound by confidentiality and privacy obligations to protect information about you.

Examples of third parties we may disclose your personal information to, include:

- solicitors, accountants, real estate agents or other advisers to provide professional advice to you in relation to one of our services;
- investment managers or other financial institutions to facilitate or manage an investment;
- insurers, underwriters, or medical practitioners for life insurance purposes or determining superannuation benefits; and
- stockbrokers to facilitate share trades.

We may transfer personal information to countries outside Australia (for example to comply with foreign trading requirements). We will only do so in compliance with all applicable Australian data protection and privacy laws. We will not disclose your personal information to an overseas recipient unless we have taken reasonable steps to ensure that recipient protects your privacy according to the



Australian Privacy Principles. Nor will we sell your personal information or otherwise disclose it to a third party, for a purpose which is unrelated to a product or service we are providing to you.

We have a strict duty to maintain the privacy of all personal information we hold about you. However, certain exceptions may apply. For example, disclosure of your personal information may be authorised or required:

- by law (e.g. disclosure to courts under subpoena or to various government departments and agencies such as the Australian Taxation Office);
- in the public interest (e.g. where a crime, fraud or misdemeanour may be committed or suspected); or
- with your consent - your consent may be implied or express and it may also be verbal or written.

## **USE OF YOUR PERSONAL INFORMATION FOR MARKETING**

We may use your personal information to send you direct marketing communications about our products and services which we believe may be of interest to you. We may also use information about you to assist us with internal marketing and research.

This includes communications by telephone, email, post or through use of our website. If at any time you wish to opt out of receiving these marketing communications, (with exception to our website, please see our 'Collection of information through our Website" section) you can use the opt-out facilities provided in our marketing communications, or by contacting us directly using the contact details below (in the 'Who do I contact for further information' section of this statement).

Once the EQT Privacy Officer receives your request they will ensure that your contact details are removed from all databases used for the purposes of direct marketing.

## **COLLECTION OF INFORMATION THROUGH OUR WEBSITE**

### **Website Collection and Cookies**

Information is collected through your use of our website to tailor your online experience. The type of information that may be collected is non-personal information such as:

- date and time of visits;
- pages you viewed;
- type of operating system;
- your computer's Internet Protocol address;
- the location of your server;
- the address of any referring website; and
- whether information has been downloaded.

Although this information is non-personal, it may constitute personal information when collated and in accordance with this statement it will be treated accordingly.

This information is collected through identification of cookies that are stored on your device when you access and interact with our website. Notwithstanding the above, no attempt will be made by us to identify you or your browsing activities, except where required by under law.

You may disable cookies on your internet browser should you wish to opt out of receiving tailored marketing communications through your interaction with our website. Please note that opting out may reduce your ability to take full advantage of our website and its features.



All of our electronic marketing activities will comply with the requirements of the Spam Act 2003 (Cth) and the Do Not Call Register 2006 (Cth).

## **HOW DOES THE EQT GROUP KEEP MY PERSONAL INFORMATION SECURE?**

EQT has implemented a range of measures to ensure your personal information is kept secure wherever possible. Access to information is regulated to prevent unauthorised use or disclosure, and security procedures apply including password encryptions, firewalls, and other technological safeguards. Identification and password security also applies to online access of personal information.

We retain personal information subject to business need but also any statutory requirements that may apply. In some cases, particularly in relation to our traditional trustee services (such as estate administration, trust management and philanthropy) we retain personal information for periods greater than seven years. However, where your personal information is no longer needed for business purposes, we will seek to destroy it or de-identify it (to ensure you cannot be identified as the person to whom the information belongs).

Although we always endeavour to provide a secure environment for your personal information, you should be aware there are inherent risks in storing or transmitting information by electronic means. This includes using online communications such as email, or online application forms. We cannot guarantee information transmitted over the internet will not be intercepted, and any such communication is made at your own risk.

### **Sensitive Information**

The EQT Group is required to obtain your consent before it collects any sensitive information from you. Sensitive information will only be collected if it is deemed necessarily required for us to carry out our functions and/or activities. If you do not consent to providing all or part of your sensitive information this may impact on our ability to meet our obligations under relevant law, including but not limited to the Superannuation Industry (Supervision) Act 1993 (Cth).

Sensitive information attracts the same definition in the Act as updated from time to time. Sensitive information includes but is not limited to:

- racial or ethnic origin; or
- political opinions; or
- memberships of a political association; or
- membership of a trade union; or
- sexual orientation or practices; or
- criminal record;
- health information about an individual; or
- genetic information about an individual that is not otherwise health information; or
- biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or
- biometric templates.

## **ACCESSING OR CORRECTING YOUR PERSONAL AND/OR SENSITIVE INFORMATION**

You can contact us at any time to request access to your personal and/or sensitive information ('information'). If you are seeking access, we ask that you submit your request in writing and provide proof of identity (such as a certified copy of your drivers licence or passport) to our Privacy Officer on the details below.



Subject to some exceptions, you may find out what personal information EQT Group holds about you. However in some circumstances, we may not be able to disclose this information. If we cannot provide information we hold to you, we will write to you to explain why we cannot do so.

If you believe the information we hold about you is incorrect or inaccurate, please notify one of our representatives as soon as you can. As with any access to information we request that you notify us in writing and provide proof of identity. We may also request that you verify the grounds for an amendment.

## **WHO DO I CONTACT FOR FURTHER INFORMATION?**

The EQT Group Privacy Officer can assist you with any enquiries you have about the information that we hold about you. You can contact our Privacy Officer by calling (03) 8623 5000 from 8.00am to 5.30pm (Melbourne time), Monday to Friday, or using the address details below:

### **Privacy Officer**

Equity Trustees Limited  
Melbourne VIC 3000  
Level 2, 575 Bourke St  
privacyqueries@eqt.com.au

## **WHAT IF I HAVE A COMPLAINT OR CONCERN?**

If you have a complaint or concern about your privacy, please contact our Privacy Officer on the details above. Please mark any written requests or complaints: 'Attention: Privacy Officer'.

If you are not satisfied with our response to your complaint, you may be able to lodge a complaint with an external dispute resolution scheme. The external dispute resolution body is established to assist you in resolving your complaint where you have been unable to do so with us. However, it's important that you contact us first.

Equity Trustees is a member of the Australian Financial Complaints Authority ('AFCA'). You can contact them with the following details:

Online: [www.afca.org.au](http://www.afca.org.au)  
Phone: 1800 931 678  
Email: [info@afca.org.au](mailto:info@afca.org.au)  
Post: GPO Box 3, Melbourne VIC 3001.

Should you be unhappy with the outcome from the external dispute resolution scheme, you have the option to refer your privacy complaint to the Office of the Australian Privacy Commissioner ('OAIC'):

Online: [www.oaic.gov.au](http://www.oaic.gov.au)  
Phone: 1300 363 992  
Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)  
Post: GPO Box 5218, Sydney NSW 2001