



Privacy Policy

CASL group of companies, including CASL Governance Ltd and all related corporate entities (**CASL**) has a commitment to respecting your privacy and believes that privacy is an important individual right.

This Privacy Policy (**Policy**) applies in relation to CASL's operations in Australia and explains how CASL complies with the *Privacy Act 1988* (Cth) (**Privacy Act**).

This Policy relates to the collection, storage and use of personal information that is covered by the Privacy Act, being information or an opinion relating to an individual, which can be used to identify that individual. This Policy is not intended to cover information that is not covered by the Privacy Act.

General

CASL requires its employees to protect and preserve personal and other confidential information held by CASL and, in addition, are bound by any specific confidentiality undertakings made by CASL to its clients.

Collecting personal information

CASL generally collects personal information directly from you. For example, CASL may collect personal information about you when you deal with us over the telephone, send us correspondence or provide information in relation to a claim. This process may be through your request for our services via CASL's website or when a representative of CASL meets with you. If you contact us, CASL may keep a record of that contact.

Generally, the type of information CASL collects and holds about clients, service providers and other business contacts will include your name, mailing and email addresses, telephone number, job title and organisation/employer name. This information is collected in order to provide clients with our services.

CASL does not collect sensitive personal information (such as information about your health, religion, or membership of a professional /trade association) unless it is reasonably necessary for the services CASL provides to you and you consent to the collection.

If you do not provide CASL with the information requested, CASL may not be able to provide you with our services.

CASL may also source information from a third party or source, such as from a publicly maintained record or from the public domain generally (e.g. internet or media). CASL will take reasonable steps where necessary to notify you when it collects your personal information from a third party or source.

Using and disclosing personal information

CASL collects, holds, discloses and uses your personal information to:

- provide our services and products to you;
- market our services and products to you (unless you have notified us that you do not wish to receive marketing material);
- keep you informed of developments that may be of interest to you and to notify you of events that CASL are holding;
generally communicate with you;
- purchase from you;
- help us manage or improve our services;
- comply with legal obligations; and/or

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- other purposes related to any of the above.

If you are a client or are employed by a client, CASL may disclose your personal information to:

- other companies or individuals who assist us in providing services or who perform functions on CASL's behalf;
- solicitors, barristers or any other experts engaged to provide you with services; and/or
- anyone else to whom you authorise us to disclose it.

If CASL engages third parties to perform services for us, which involves the third party handling personal information that CASL holds, CASL prohibits the third party from using personal information about you, except for the specific purpose for which CASL supplies it.

CASL does not disclose any personal information it collects to third parties for the purpose of allowing them to directly market their products and services. CASL does not sell or trade personal information.

Disclosure of personal information outside Australia

CASL may disclose your personal information to overseas persons or entities if it is required for CASL to perform its services for you. The countries in which such overseas recipients are located will depend on the circumstances of the services CASL provides you.

CASL will take reasonable steps to ensure that any overseas persons or entities to whom any personal information is disclosed do not breach the relevant Australian Privacy Principles.

Accessing and correcting personal information CASL holds about you

You can contact CASL at any time to request access to your personal information or for your personal information to be corrected or updated.

Unless an exception applies, CASL will, upon request and within 28 days, provide you with access to the personal information CASL holds about you. CASL will provide you with access to your personal information in a manner requested by you (providing it is reasonable and practicable to do so).

If CASL is unable to provide you with access to the information, CASL will provide you with reasons and inform you of any exceptions relied upon under the Privacy Act (e.g. if your request is unreasonable or relates to legal proceedings including privilege or is otherwise unlawful). CASL will also provide you details of the process for making a complaint about the refusal to grant you access.

CASL will take appropriate steps to verify your identity (or verify that you act as a legal guardian or authorised agent of the individual concerned) before granting a request to access your personal information.

CASL will take reasonable steps to ensure that the personal information CASL collects about you is accurate, up-to-date, complete and relevant. Upon request, CASL will correct your information within 28 days of the request. CASL will take reasonable steps to notify any relevant third parties of the correction.

Commercial information

As with the use of personal and disclosure of personal information, CASL primarily collects and uses commercial information to provide services to its commercial clients. Types of commercial information includes (but is not limited to) contact information, investment trade data, related trading processes and policies. Specific commitments are made by CASL as part of its commercial agreements with clients.

Information storage and security

CASL takes all reasonable steps to ensure that your information is kept secure. Your information may be stored in hard copy documents and/or as electronic data in CASL's software or systems. CASL maintains physical security over its premises and also maintains computer and network security.

Where CASL uses cloud data storage services, CASL only uses physically secure data storage services located in Australia.

CASL seeks to continually improve its security measures and related processes such as access control limits, authentication measures and access history logs for the better protection of its clients.

CASL's website and use of cookies

A cookie is a small data file that a website may write to your hard drive when you visit. A cookie file can contain information (such as a user ID) that the website can use to track the pages you have visited and your preferences. The only personal information a cookie can contain is information you personally supply. A cookie cannot read data from your hard disk or read cookie files created by other websites.

CASL uses cookies to track user traffic patterns through its website.

Spam Act

CASL complies with the *Spam Act 2003* (Cth), which regulates the sending of emails and other commercial electronic messages.

Effect of the Policy

This Policy does not form a contract between an individual and CASL. This Policy may change to reflect CASL's business and technology. Whenever you need to refer to this Policy you should refer to CASL's website – www.casl.com.au – or contact us for the most up to date version.

Please note that CASL's website may contain links to other websites. When a user has clicked on a link to another site, they leave the CASL site and are no longer protected by this Policy.

Complaints

If you believe that CASL has breached a term of this Policy or the Australian Privacy Principles you may submit a complaint to CASL's Complaints Officer:

CASL Governance Ltd
Attention: Complaints Officer
Level 13, 115 Pitt Street
SYDNEY NSW 2000
Phone: +61 1800 26 26 00
Email: enquiries@casl.com.au

Your complaint will be addressed in accordance with CASL's Complaints Handling Procedure.

Contacting CASL

If you wish to gain access to your personal information, amend your personal information, have any query regarding the Policy or wish to obtain a hard copy of the Policy, please contact us directly via email, phone or post:

CASL Governance Ltd
Attention: Privacy Officer
Level 13, 115 Pitt Street
SYDNEY NSW 2000
Phone: +61 1800 26 26 00
Email: enquiries@casl.com.au

This Policy was adopted by the board of directors of CASL Governance Ltd on 12 November 2020.