

PRIVACY POLICY

This Privacy Policy sets out how and why Cooper Investors Pty Limited (“CI”, “we” or “us”) collects, stores, uses and discloses personal information. By using CI’s services or otherwise providing CI with your personal information (or authorizing it to be provided to CI by someone else), you agree to your personal information being handled as set out in this Privacy Policy

Personal information

Cooper Investors Pty Limited (“CI”) collects personal information in its capacity as a fund manager. Such information may include clients’ names, addresses, contact details, date of birth, country of residence, investment details, tax file numbers, bank account details and other accounting, audit and financial services related information. The primary purpose of collection of personal information is to assist in the management of client portfolios including (but not limited to) facilitating distribution payments and corporate communications such as our clients’ performance reports.

Collection, maintenance and disclosure of certain personal information is governed by legislation including (but not limited to) the Privacy Act 1988 (Cth), the Australian Privacy Principles, the Corporations Act 2001, the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 and Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007, Income Tax Assessment Act 1997 / Tax administration Act 1953, and the Superannuation Industry (supervision) Act 1993.

CI may collect personal information in various ways such as via telephone, email, hardcopy and/or online forms. In most situations we collect personal information directly from you. We may however also collect information via third parties such as our custodian.

If CI receives personal information that was not requested (i.e. unsolicited personal information), CI will, unless otherwise required or permitted by law, delete or destroy the information as soon as possible after receiving it.

You must not provide us with personal information about another person unless you have clear consent from that person to do so and have told them that their personal information will be handled in accordance with this Privacy Policy and where they can find it.

You do not have to provide us with your personal information, but if you do not provide us with the required personal information, we may not be able to provide our services or assistance to you.

Disclosure of personal information by CI

Clients' personal information may be disclosed, if appropriate, to other entities in order to facilitate the purpose for which the information was collected. Such entities include the trustees who hold the investments which we manage, third party service providers such as our back office support firm, National Australia Bank Limited, certain government and regulatory bodies. Other types of organisations we might disclose your personal information to for the purpose for which the information was collected include accountants, financiers, auditors, legal advisers, and other professionals. CI may also disclose personal information to entities for which you have given your express consent.

At the date of this policy CI does not disclose (and has never disclosed) any personal information to parties that are located in countries outside of Australia. CI has no intentions to disclose any personal information to parties located outside of Australia. In the event that we will disclose personal information to overseas entities, contracts will generally include obligation for them to comply with Australian privacy law and this Privacy Policy. You acknowledge however that in this case, by agreeing to the disclosure of your personal information to these entities outside of Australia, CI will no longer be required to take reasonable steps to ensure the overseas recipient's compliance with the Australian privacy law in relation to your personal information and we will not be liable to you for any breach of the Australian privacy law by these overseas recipients.

Integrity

To ensure the integrity and safety of our clients' personal information, CI will only disclose any information if our internal procedures are satisfied. CI takes reasonable steps to protect any personal information that we hold from misuse, interference and loss and from unauthorized access, alteration and disclosure. The following security protocols have been implemented:

- Security procedures for access to our business premises;
- IT security protocols including security around access of data, firewalls, password protection, and strict rules around VPN access;
- Mandatory confidentiality guidelines for all staff (as outlined in employment contracts).

However, data protections measures are never completely secure and, despite the measures we've put in place, CI cannot guarantee the complete security of your personal information.

Revisions to this Privacy Policy

CI may update this Privacy Policy from time to time. Your continued use of CI's services, requesting our assistance or the provision of further personal information to CI (directly or via an authorized person) after this Privacy Policy has been revised, constitutes your acceptance of the revised Privacy Policy.

Update your personal information

CI takes reasonable steps to ensure the personal information we hold about you is accurate, up-to-date, and complete. You may access, correct and update the personal information that we hold about you. Please contact the Compliance Manager at the address set out below as soon as possible if there are any changes to your personal information or if you believe the personal information we hold about you is not accurate, complete or up-to-date for CI to update your file accordingly.

Complaints

If you wish to make a complaint about a breach of this Privacy Policy or the privacy principles of the Privacy Act 1988 (Cth) please also contact the Compliance Manager at the address set out below. The Compliance Manager will investigate the issue and determine the steps to undertake to resolve your complaint. We will notify you in writing of the outcome of the investigation. If you are not satisfied with the outcome of the investigation you may contact us to discuss your concerns or complain to the Australian Privacy Commissioner via www.oaic.gov.au.

Contact details

Compliance Manager
Cooper Investors Pty Limited
Level 1, 60 Collins St
Melbourne VIC 3000
Phone: (03) 9660 2600
Fax: (03) 9660 2699
Email: compliance@cooperinvestors.com

Approved by the Board of Directors - 26 February 2014