

The Myer Family Company Ltd (ACN 006 588 727) (“MFCo” or “we” or “us”) collects, stores, uses and discloses information which is considered to be “personal information”. The **Privacy Act 1988 (Cth)** (the “Act”) governs the protection of such information. “Personal information” means:

Information or an opinion about an identified individual or an individual who is reasonably identifiable:

- *Whether the information or opinion is true or not; and*
- *Whether the information or opinion is recorded in a material form or not.*

MFCo must meet the requirements of the Australian Privacy Principles (APPs) for the treatment of personal information. We have developed this policy for the management of personal information. This document includes privacy procedures and applies to MFCo and its subsidiaries (notably, MFCo Nominees Ltd). Accordingly, a reference to MFCo includes MFCo’s subsidiaries.

The principles and procedures contained in this document set out our commitment to the protection of personal privacy. They apply to all personal information under our control including personal information held or stored by our agents and contractors.

Anyone handling personal information for which MFCo is responsible, whether he or she is an employee, officer, agent or contractor of MFCo, is expected to act in accordance with the principles and procedures set out in this policy.

1. Kinds of Personal Information

1.1 Depending on the services we provide to you, we may collect one or more of the following types of personal information from you:

- **Basic contact details** (name, address, e-mail, phone, fax details);
- **Basic personal information** (birth date, place of birth, nationality, residency);
- **Financial account information** (types of bank/broker accounts, numbers, authorised signatories);

- **Financial affairs information** (tax and accounting, investments and assets);
- **Government Information/Identifiers** (Tax File Numbers, licensee details, travel documents)
- **Business Information/sources of wealth** (employment, officerships, business projects, inheritance);
- **Social & Domestic Information** (family members, vehicles and significant personal assets);
- **Health Information** (conditions / illnesses, health services / medications, organ donations, genetic information);
- **Other Sensitive Information** (sexuality, religious and philosophical views / associations, political views / associations, trade union membership, biometric / psychometric data).

1.2 We care about the quality of our records and seek to ensure that personal information held by us is accurate, up-to-date and complete, both at the time of collection and before each use or disclosure, and relevant for the purpose for which it is to be used at each use or disclosure of your personal information.

1.3 We also care about the security of your personal information and seek to ensure that your personal information held by us is protected from misuse, interference and loss as well as unauthorised access, modification or disclosure.

1.4 MFCo will take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed. However, personal information which is the subject of complaint, inquiry or legal process will not be destroyed until the resolution of that process.

2. Collection and holding of Personal Information

2.1 We will collect personal information in a variety of ways, including when you interact with us electronically, in writing or in person; when you

access our websites; and when we provide services to you. When you visit our websites:

- We may collect certain information such as your browser type, operating system and website visited immediately before accessing ours. This information is used in an aggregated manner in order to improve our service.
- We may use cookies. These are common small files which a website uses to identify your visits the website and to store details about your use of the website. We use cookies to improve the experience of persons using our websites.
- There may be links to other websites not owned or controlled by us. We are not responsible for those websites or the consequences of you accessing and using those websites.

2.2 Personal information will only be collected by lawful and fair means and not in an unreasonably intrusive way.

2.3 In most circumstances, and for practical and legal reasons, we will require identification from you and your representatives in order provide you with services. Further, it will be generally necessary for you and your representatives to clearly identify yourselves in your communications with us.

2.4 Where circumstances permit, we will give you the option of operating anonymously with us or using a pseudonym. For example, if you have completed the “account designation” section on an application form for units in one or more of MFCo’s pooled investment funds (including the MF Cash Management Fund), we will, if requested by you, refer to the account designation in all communications where it is lawful to do so.

2.5 Your basic contact details may be provided to us by third parties. However, generally, we will only collect your personal information directly from you and take reasonable steps in the

circumstances to notify or ensure that you are provided with a Privacy Collection Notice.

2.6 We have determined that it is unreasonable or impracticable either to collect personal information from you or to notify you that your personal information has been collected in the following circumstances:

- Where personal information has been included in an agreement, deed, register or government report received by us where you are merely named in the document and have no direct relationship with MFCo;
- Where the personal information concerns financial account details and the information has been provided to us for the purpose of making a payment to you;
- Where personal information has been provided by your guardian or other responsible person or authorised person in circumstances where we reasonably believe that you consent to the disclosure.

2.7 Nonetheless, we will not knowingly collect sensitive information unless we believe you have consented to its collection. For example, we may receive details of your health services or political affiliations on a statement or invoice provided to us as part of our bill-paying service. Where we reasonably believe that your consent is not forthcoming your sensitive information will not be collected by us.

2.8 Your personal information will be held in hard-copy form at one or more of our offices and in electronic form on our or the servers of one or more of our IT providers (see point 6 below).

2.9 Where an external service provider (such as an accountant or lawyer) is engaged by us on your behalf or with your consent, your personal information and personal information of your family and associates may be provided to that external service provider.

3. Purposes of Personal Information

- 3.1 We will only collect personal information that is necessary for one or more of our functions or activities. Where you are a client, we use your information to provide services to you. We also use it to improve our services and to notify you of opportunities that we think you might be interested in. However, you do have the right to opt out of direct marketing communications.
- 3.2 If we receive unsolicited personal information that is not necessary for one of our functions or activities, we will, if lawful to do so, destroy or otherwise de-identify that personal information.
- 3.3 Generally, MFCo will only use your personal information for a purpose other than the primary purpose of collection (a secondary purpose) if:
- You have consented to the use or disclosure. Where practicable, MFCo will at the time of collection seek consent from you to use the information for a secondary purpose. If express consent is not provided, the personal information will only be used for purpose specified at the time of collection.
 - MFCo reasonably believes you would reasonably expect us to do so and provided the secondary purpose relates to the primary purpose. (Where your personal information is health or other sensitive information, the secondary purpose must directly relate to the primary purpose). The assessment of whether a proposed use is directly related to the purpose specified at the time of collection and within your reasonable expectations will be made on a case by case basis.
- 3.4 However, MFCo may also use your personal information for a secondary purpose if:
- The use or disclosure of the information is required or authorised by law or under a court/tribunal order. MFCo will ensure that the use or disclosure is lawful and that personal information is only used to the extent

required to ensure compliance with the law.

- The use or disclosure is expressly permitted under the Act (for example, where disclosure is necessary to lessen or prevent a serious threat to life, health or safety).
- MFCo reasonably believes that the use or disclosure is reasonably necessary for a enforcement related activity by an enforcement body (eg police), in which case a written note of the use or disclosure must be made by MFCo.

3.5 Where MFCo Nominees Ltd or another related body corporate collects personal information and provides it to MFCo, the primary purpose for which information was collected will apply to MFCo.

3.6 MFCo has subscribed to one or more electronic transactions channels provided by the National Australia Bank (NAB Channels). Where a transaction is processed on your behalf through a NAB Channel your personal information:

- Will be collected by NAB for the purposes of conducting the transaction, managing and administering the NAB Channel and the NAB Channel services and to protect against fraud.
- May be disclosed by NAB to other organisations involved with the provision, management or administration of the NAB Channel and the NAB Channel Services or as required by law.
- May be shared by NAB with overseas organisations and you may visit www.nab.com.au/privacy/overseas-countries-list to find out more about countries where your personal information may be sent.
- Will be handled by NAB in the way set out in NAB's Privacy Notification www.nab.com.au/privacy notification and Privacy Policy www.nab.com.au/privacy and you may also request copies by contacting NAB on 13 22 65.

3.7 Where your personal information is provided to NAB for the purposes mentioned in point 3.6 you can gain access to and seek correction of your personal information or make a complaint about how your personal information is handled by NAB by contacting NAB.

3.8 If you do not agree to your personal information being disclosed to NAB, you should not open an account with the MF Cash Management Fund or request us to link your accounts to a NAB Channel.

4. Accessing Personal Information

4.1 Where we hold your personal information, generally we will provide you with access to that information on request, in a form or manner suitable to your needs.

4.2 We will only deny access to your personal information on the grounds set out in the Act. For example, we will not provide access where life, health or safety would be seriously threatened, where it would be unlawful to do so or if access would prejudice action undertaken or contemplated by a law enforcement agency. We will deny access where it would unreasonably impact upon the privacy of other individuals or compromise MFCo's legitimate commercial negotiations.

4.3 Please contact your Client Director or Client Manager if you require access to your personal information, the personal information of others that you are lawfully permitted to access or if you believe personal information is out-of-date or otherwise faulty.

4.4 Generally, we do not charge a fee for providing you with access to your personal information or the personal information of others that you are lawfully permitted to access. However, we reserve the right to recover from you the reasonable administrative costs of attending to your request. Nonetheless, we do not charge for correcting the personal information we hold.

4.5 We will provide reasons for denial of access to or a refusal to correct personal information.

5. Complaints

5.1 If you have any complaints about our privacy practices, please send details of your complaint to your Client Director or Client Manager.

5.2 If your complaint is not satisfactorily resolved within five days, please contact the General Manager, Client Services on (03) 9207 3000 or put your complaint in writing and send it to the General Manager, Client Services, The Myer Family Company Ltd, at Level 7, 171 Collins Street, Melbourne Vic 3000.

5.3 We take complaints very seriously and will try to resolve your complaint quickly and fairly.

5.4 If you still do not get a satisfactory outcome, you may complain to the Financial Ombudsman Service at GPO Box 3, Melbourne Vic 3001. (Telephone 1300 780 808, Fax (03) 9613 6399 or Email info@fos.org.au). You may also complain to the Office of the Australian Information Commissioner (Telephone 1300 363 992, Fax (02) 9284 9666 or Email enquiries@oaic.gov.au).

6. Overseas Disclosure

6.1 We have entered into agreements with one or more IT service providers operating outside of Australia. As a consequence, personal information, being basic contact details and financial affairs information, may be subject to cross-border disclosure between Australia, Canada and the USA.

6.2 Where we facilitate an overseas transaction on your behalf, for example the purchase or settlement of overseas investments, personal information, being basic contact details, financial account information and financial affairs information may be disclosed to the overseas counterparty or intermediary (such as bank) for the purposes of completing the transaction and compliance with relevant overseas regulatory requirements including anti-money laundering and counter-terrorism financing legislation. In such circumstances, we will consult with you

where we reasonably believe you would not expect us to disclose the information.

- 6.3 If you are a natural person client and have authorised one or more of your authorised signatories or other viewers to access your accounts through our secure website at www.karlsruhe.com.au, then your personal information, being one or more of the types of personal information described above, will be subject to cross-border disclosure between Australia and any overseas jurisdictions where the authorised signatories and viewers access the website from overseas.

- 6.3 Under certain circumstances, MFCo will not be accountable under the Privacy Act when we disclose your personal information to an overseas recipient. You will not be able to seek redress under the Privacy Act and may not be able to seek redress in the overseas jurisdiction. Further, the overseas recipient may not be subject to any privacy obligations similar to the Australian Privacy Principles but may be compelled to disclose personal information to third parties, including overseas regulatory authorities.